



Commonwealth Edison  
 1400 Opus Place  
 Downers Grove, Illinois 60515

February 6, 1992

PRIORITY ROUTING	
NAME	DATE

*ORCOT 2/1/92*

*to region*

Mr. A. Bert Davis  
 Regional Administrator  
 U.S. Nuclear Regulatory Commission-R111  
 799 Roosevelt Road  
 Glen Ellyn, IL 60137

Subject: Quad Cities Station Units 1 and 2  
 Appeal of Provision in NPDES Permit  
 NRC Docket Nos. 50-254 and 50-265

Reference: J.L. Schrage (CECo) letter to  
 A. Bert Davis, (NRC-R111)  
 dated January 3, 1992

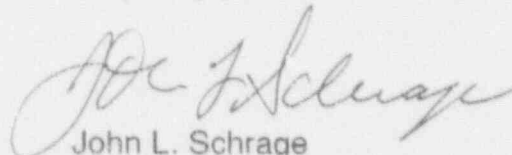
Dear Mr. Davis:

Commonwealth Edison Company is the holder of National Pollutant Discharge Elimination System (NPDES) Permit No. IL0005037 for Quad Cities. Station Section 2.2 of Appendix B (Environmental Protection Plan) of Facility Operating Licenses DPR-29 and DPR-30 requires notification of the NRC if a permit, in part or in its entirety, is appealed and stayed.

Enclosed is Quad Cities Station's appeal of a provision in the renewed NPDES Permit. This renewed NPDES permit was issued on December 4, 1991, and became effective on January 3, 1992. A copy of the renewed permit was submitted to the NRC on January 3, 1992 (referenced letter).

Please direct any questions regarding this matter to John L. Schrage at 708-515-7283.

Very truly yours,



John L. Schrage  
 Nuclear Licensing Administrator

Enclosure

cc: L.N. O'lishan, Project Manager-NRR  
 T.E. Taylor, Senior Resident Inspector-Quad Cities  
 NRC Document Controls Desk

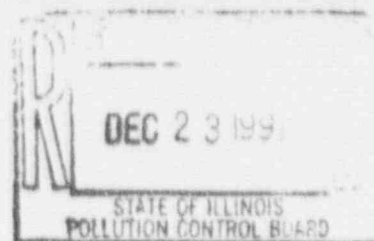
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*TEHR*

FEB 10 1992

BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS



COMMONWEALTH EDISON COMPANY, )  
 )  
 ) Petitioner, )  
 )  
 ) vs. )  
 )  
 ) ILLINOIS ENVIRONMENTAL PROTECTION )  
 ) AGENCY, )  
 )  
 ) Respondent. )

PCB 91-257

NOTICE OF FILING

To: Thomas G. McSwiggin, P.E.                      Lisa Moreno  
Manager, Permit Section                      Illinois Environmental  
Division of Water                                  Protection Agency  
Pollution Control                                  2200 Churchill Road  
Illinois Environmental                              Springfield, Illinois 62706  
Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62706

PLEASE TAKE NOTICE that I have today filed with the Clerk of the Pollution Control Board Commonwealth Edison Company's Petition for Review of NPDES Permit, a copy of which is attached hereto and herewith served upon you.

COMMONWEALTH EDISON COMPANY

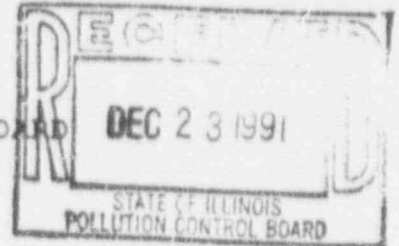
By: \_\_\_\_\_  
One of its Attorneys

Dated: December 23, 1991

Alan P. Bielawski  
David J. Engel  
Julie F. Marcus  
SIDLEY & AUSTIN  
One First National Plaza  
Chicago, IL 60603  
(312) 853-7000

FEB 10 1992

BEFORE THE  
ILLINOIS POLLUTION CONTROL BOARD



COMMONWEALTH EDISON COMPANY,	)	
	)	
Petitioner,	)	PCB 91-257
	)	
v.	)	Petition for Review
	)	of NPDES Permit
ILLINOIS ENVIRONMENTAL	)	Conditions
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

WAIVER OF DECISION DEADLINE

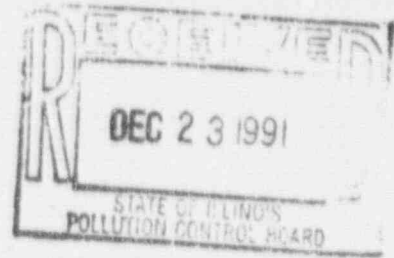
Petitioner Commonwealth Edison Company ("Commonwealth Edison"), by its attorneys, Sidley & Austin, pursuant to Sections 40(a)(3) and 41(d) of the Illinois Environmental Protection Act, Ill. Rev. Stat. ch. 111 $\frac{1}{2}$ , pars. 1040(a)(3) and 1041(d), hereby waives the Board's decision deadline.

Respectfully submitted,

By: \_\_\_\_\_  
One of the Attorneys for  
Commonwealth Edison Company

Alan P. Bielawski  
David J. Engel  
Julie F. Marcus  
SIDLEY & AUSTIN  
One First National Plaza  
Chicago, IL 60603  
(312) 853-7000

Dated: December 23, 1991



BEFORE THE  
ILLINOIS POLLUTION CONTROL BOARD

COMMONWEALTH EDISON COMPANY,        )  
    Petitioner,                            )  
  )  
    v.                                        )  
  )  
ILLINOIS ENVIRONMENTAL                )  
PROTECTION AGENCY,                    )  
  )  
    Respondent.                         )

PCB 91- 257

PETITION FOR REVIEW OF NPDES PERMIT

Petitioner, Commonwealth Edison Company ("Commonwealth Edison"), by its attorneys, Sidley & Austin, pursuant to Section 40(a) of the Illinois Environmental Protection Act, Ill. Rev. Stat., ch. 111½, par. 1040(a), respectfully petitions the Board for review of a special condition contained in Commonwealth Edison's reissued National Pollutant Discharge Elimination System ("NPDES") Permit Number IL0005037. Commonwealth Edison states the following in support of its petition:

1. Respondent, Illinois Environmental Protection Agency ("Agency" or "IEPA"), issued NPDES Permit No. IL0005037 to Commonwealth Edison on December 4, 1991. The effective date of the permit is January 3, 1992; its expiration date is June 1, 1995. A copy of the permit is attached hereto as Exhibit A.

2. Commonwealth Edison owns and operates a nuclear power generating station at 22710 206 Avenue North in Cordova, Rock Island County, Illinois.

3. Commonwealth Edison's reissued permit includes an effluent limitation of 0.2 mg/l for bromine-based biocides in condenser cooling water and 16 Special Conditions. Special Condition 16 requires that Commonwealth Edison meet the bromine effluent limitation for two years. After approximately one year, Commonwealth Edison is required to confer with IEPA and USEPA to determine whether this effluent limitation will be modified. The use of bromine-based biocides in condenser cooling water must cease within two years of the effective date of the permit, unless IEPA modifies the permit to allow their use following public notice and comment.

4. Special Condition 16 is not consistent with procedural requirements of the Environmental Protection Act and the Board's Regulations. IEPA apparently would not be required to process a permit modification within a particular time period, and thus Edison could be penalized for delays in the permit modification process even if Edison was not at all responsible for such delays. In promulgating Special Condition 16, IEPA apparently anticipates a need to revisit the effluent limitation for bromine after two years. However, if future regulatory developments lead IEPA to determine that a different effluent limitation is required, IEPA could modify the permit pursuant to Standard Condition 6 which



CERTIFICATE OF SERVICE

The undersigned, being first duly sworn on oath,  
deposes and states that the foregoing Petition for Review of  
NPDES Permit was served on the persons to whom said Notice is  
addressed by first class mail, postage prepaid, on the 23rd day  
of December, 1991.

Subscribed and sworn to  
before me this 23rd day  
of December, 1991.

Margaret M. Erdelyi

