

NINE MILE POINT NUCLEAR STATION

STATE POLLUTION DISCHARGE ELIMINATION SYSTEM (SPDES) PERMIT NUMBER NY-000-1015

DISCHARGE MONITORING REPORT

COMMENTS AND REPORTS OF NON-COMPLIANCE EVENTS

FOR PERIOD OF

JANUARY 1, 1995 THROUGH JUNE 30, 1995

Explanatory Note: Regarding "NODI C"

*

In the case where there is no discharge of a certain parameter, at any time during the entire monitoring period, the permittee shall enter "NODI C", meaning no discharges in the appropriate sample measurement box(es).

The permittee shall provide an explanation of the "NODI C" notation by attaching said explanation to the original DMR to be returned to BWFO- Source Surveillance Section in the Albany Office. As an alternative to this, the permittee may provide such explanation in the, "Comment and Explanation of any Violations" section of the DMR itself.

* From New York State Department of Environmental Conservation Publication:

DMR Manual: For Completing the Discharge Monitoring Report of the National Pollution Discharge Elimination System (NPDES), January 1994.

**DISCHARGE MONITORING REPORT
PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
JANUARY 1995**

COMMENTS

UNIT 1

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 1 Outfall 010 as there were no Clam-Trol or Actibrom (TRO) additions during January 1995. Also, "NODI C" was noted for Outfall 010 Total Copper as a grab sample is only to be obtained during condenser tube cleaning operations. However, a January baseline grab sample result for Total Copper was <0.02 mg/L.
2. As noted in the December 1994 DMR comments for Outfall 020 (Unit 1 Storm Water Drainage), the action level for iron was exceeded. The short-term, high intensity monitoring program for this parameter continued through January and into February. The results of this monitoring will be submitted by the end of March 1995, as required by the Permit.

UNIT 2

3. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 2 Outfall 040 as there were no Clam-Trol or Copper-Trol additions during January 1995.

**DISCHARGE MONITORING REPORT
PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
FEBRUARY 1995**

COMMENTS

UNIT 1

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 1 Outfall 010 as there were no Clam-Trol or Actibrom (TRO) additions during February 1995.
2. For the Sewage Treatment Plant Outfall 030, results of the two required fecal coliform samples collected for the month of February 1995 were 13/100ml and >1600/100ml, resulting in a 30 day geometric mean of >144/100ml. The contractor laboratory that performed the analysis did not produce an actual number. The >1600/100ml result would have had to exceed 3079/100ml to have resulted in an exceedence of the 200/100ml permit limit.

This result was called into the Department (Region 7) on March 15, 1995. Based on a review of our SPDES Permit and DMR forms, it was concluded by the Department that this >144/100ml value did not represent an excursion, but should be noted as a written comment in the DMR.

The next fecal coliform result for 3/7/95 was 8/100ml and Niagara Mohawk has instructed the contractor laboratory to run all future fecal coliform analysis such that an actual numerical value is produced and not a greater than value.

3. During the current Unit 1 refuel outage, a zebra mussel cleaning/removal operation was conducted in the Unit 1 forebay. Discussions were held with the Department on February 23, 1995 and a meeting on 2/24/95 in the regional office regarding the evolution of this operation. As a result, a summary report related to this cleaning operation and restart of the circulating water pumps will be provided to the Department approximately thirty days after the end of the Unit 1 refuel outage (on or about mid-May 1995).
4. As noted in the December 1994 DMR comments for Outfall 020 (Unit 1 Storm Water Drainage), the action level for iron was exceeded. The short-term, high intensity monitoring program for this parameter continued through January and into February. The results of this monitoring are summarized as follows and submitted as required by the Permit.

While the high intensity short-term monitoring program requires samples to be collected on at least three operating days, five samples were collected from the Outfall, as well as two background samples.

DISCHARGE MONITORING REPORT
PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
FEBRUARY 1995

COMMENTS

High Intensity/Short-term Monitoring Results

<u>Sampling Date</u>	<u>Sampling Location</u>	<u>Result</u>
1/09/95	End of Discharge Pipe	0.408mg/L
1/16/95	End of Discharge Pipe	0.592mg/L
1/23/95	End of Discharge Pipe	0.981mg/L
1/30/95	End of Discharge Pipe	0.257mg/L
2/06/95	End of Discharge Pipe	0.234mg/L

Background Samples

On 1/11/95, a sample was collected (prior to the water softener) from a local resident's well located approximately 1.5 miles west of Outfall 020 and on 1/16/95, a sample of ground water was collected from the discharge of the Unit 2 Reactor Building perimeter drain in an effort to determine representative ground water iron levels at and near the Nine Mile Point site. The well water sample had an iron level of 0.286mg/L and the Unit 2 reactor building perimeter drain had an iron level of 0.107mg/L.

Continuing Evaluation

Further investigation led to discussions between Nine Mile Point Environmental Protection staff and the Oswego County Health Department to determine if the Health Department had any knowledge of high iron levels in the local water table. According to Ms. Michelle Benton of the Health Department's Environmental group, the lake shore area of Oswego county does have localized areas of high concentrations of ferrous bacteria which could be responsible for Nine Mile Point fluctuating iron results. NMPC is considering sampling to confirm this as well as more generally determining total recoverable vs dissolved iron in the effluent.

In addition, it should be noted that Unit 2 Outfall 040 (Cooling Tower and Service Water), which is a once-through cooling water system, has a quarterly iron action level of 1.0mg/L. Therefore, it is Niagara Mohawk Power Corporation's position that the quarterly action level for iron for Outfall 020 should be raised from the present level of 0.3mg/L, which is the State Water Quality Standard, to 1.0mg/L to be consistent with Outfall 040.

UNIT 2

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 2 Outfall 040 as there were no Clam-Trol or Copper-Trol additions during February 1995.

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NINE MILE POINT NUCLEAR STATION
FEBRUARY 1995**

COMMENTS

UNIT 2 (cont.)

2. On February 14, 1995, an overflow of the Unit 2 cooling tower basin occurred. The copper concentration and pH value were within the permit limits and these parameters are reported on the attached DMR forms for Outfall 025. Based upon direct observation of the overflow and its duration, the total volume discharged is estimated to be approximately 60,000 gallons. Since the flow reporting frequency for this Outfall is annual, the flow will be reported on the appropriate DMR form when it becomes available.

**PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
MARCH 1995**

COMMENTS

UNIT 1

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 1 Outfall 010 for Betz Clam-Trol and Actibrom (TRO) as there were no Clam-Trol or TRO additions during March 1995.
2. The copper discharge limitation of 0.25mg/L Outfall 010 was exceeded on March 25, 1995, when a sample was collected following restart of the circulating water pumps at 18:15 hours. The resulting analysis indicated a copper level of 0.468 mg/L. The source of this copper is attributed to condenser cleaning activities, which had occurred during the refueling outage. This information was telephoned into the Region 7 Office on March 28, 1995 to Mr. Kevin Hanifin following our notification by our contractor laboratory of the result. A written follow-up notification was provided to Mr. William McCarthy on March 29, 1995 (Attachment I).

Subsequent to the isolation of the circulating water pumps on March 26, 1995, copper samples were taken on March 28, 1995 and again when the pumps were restarted on March 30, 1995. The sample taken on March 28, 1995 and all samples taken during the one hour period post restart on March 30, 1995 were all below the outfall permit limit (<0.020 mg/L to 0.028mg/L). Therefore, the initial high results (during the initial restart of the circulating water pumps on March 25, 1995) represented a flushing action. See the attached Noncompliance Form (Attachment II) for more details.

3. During the first quarter of 1995, Quarterly Action Level samples were obtained for applicable outfalls as described on page 7 of 16 of the Nine Mile Point SPDES Permit. As noted in the cover letter, these results are reported on the applicable DMR (V) forms. One action level (iron for Outfall 020 Unit 1 Storm Water Drainage) was exceeded. The immediate corrective action was to begin a short-term, high intensity monitoring program for this parameter, as described on page 7 of 16 of the Permit.

High Intensity/Short-Term Monitoring Results

<u>Sampling Date</u>	<u>Sampling Location</u>	<u>Result</u>
2/13/95	End of Discharge Pipe	0.712mg/L
2/20/95	End of Discharge Pipe	0.495mg/L
2/27/95	End of Discharge Pipe	0.655mg/L
2/27/95	Last Manhole Before End of Discharge Pipe	0.869mg/L*
3/09/95	End of Discharge Pipe	0.215mg/L**

NOTE: *Sampling from the last manhole prior to the end of the discharge pipe did not yield any significantly different results.

**Result below action level limit.

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MARCH 1995**

COMMENTS

3. (cont.)

The above results satisfy the requirements of the short-term, high intensity monitoring program for the higher than action level value of February 12, 1995.

In addition, it should be noted that Unit 2 Outfall 040 (Cooling Tower and Service Water) has a quarterly iron action level of 1.0mg/L. Therefore, Niagara Mohawk Power Corporation will continue to monitor and evaluate the quarterly action level for iron for Outfall 020 and, if it is deemed appropriate, NMPC will prepare a permit modification request to raise the present level of 0.3mg/L to 1.0mg/L to be consistent with Outfall 040.

4. As noted in the February 1995 DMR comments, a zebra mussel cleaning/removal operation was conducted during the recently completed Unit 1 refuel outage. Zebra mussel cleaning/removal activities were completed on March 1, 1995 in accordance with a plan discussed with the Department in a meeting on February 24, 1995 in the regional office. As outlined in the plan, the Outfall 010 suspended solids were monitored following the restart of one of the circulating water pumps on March 25, 1995 at 1815 hours. The results of this monitoring, submitted to the region under separate letter on March 27, 1995 are as follows:

Pre-circulating water pump operation

< 1.0 mg/L

Post circulating water pump operation

Initiation	15 mg/L
T + 15 min	908 mg/L
T + 15 min	937 mg/L
T + 30 min	229 mg/L
T + 60 min	18 mg/L

The above monitored increase and following decrease in suspended solids level represents a post circulating water pump restart flushing action.

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 MARCH 1995**

COMMENTS

4. (cont.)

Additionally, Outfall 010 suspended solids were monitored daily for the remainder of the month and for one hour following restart of the circulating water pumps on March 30, 1995 at 1215 hours for plant start-up. These results are as follows:

<u>Daily Monitoring</u>		<u>Post Restart Monitoring</u>	
<u>Date</u>	<u>Results</u>	<u>Time</u>	<u>Results</u>
3/26/95	0.8 mg/L	+ 5 min	5.2mg/L
3/27/95	0.5 mg/L	+15 min	<4mg/L
3/28/95	0.2 mg/L	+30 min	<4mg/L
3/29/95	0.0 mg/L	+60 min	<4mg/L
3/30/95	0.2 mg/L		
3/31/95	1.2 mg/L		

Suspended solids is not an effluent parameter for Outfall 010. It was determined at the February meeting that the performance of the forebay cleaning activities and start up of the circulating water pump would not be considered violations of our SPDES Permit provided we conducted the activities in accordance with the outline provided at the meeting. As a result, a complete summary report related to this cleaning operation and restart of the circulating water pumps will be provided to the Department after the end of the Unit 1 refuel outage (on or about mid-May 1995).

UNIT 2

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 2 Outfall 040 for Betz Clam-Trol, as there were no Clam-Trol additions during March 1995.
2. The Unit 2 strip chart recorder used to measure outfall 040 (Cooling Tower Blowdown and Service Water) discharge flow, intake/discharge temperature difference and discharge temperature was inoperable for short periods in March 1995, due to testing/calibration. Maximum water flow and/or temperature data for the period prior to or following the testing/calibration were used during these periods.

March 29, 1995

William F. McCarthy, P.E.
Environmental Engineer II
New York State Department of
Environmental Conservation
615 Erie Boulevard West
Syracuse, New York 13204-2400

SUBJECT: Nine Mile Point Nuclear Station
SPDES Permit No. NY 000 1015
Outfall 010 Copper Exceedence

Dear Mr. McCarthy:

This letter will serve as a written follow up to my telephone notification on March 28, 1995 at 14:55 hours to Mr. Kevin Hanifin of your office regarding the exceedence of the Daily Max. Discharge Limitation for copper on Outfall 010. A sample was taken for the subject outfall on March 25, 1995 at 18:20 hours following the start up of one of the circulating water pumps (March 25, 1995 at 18:15 hours). The sample was analyzed by a vendor laboratory and the results were telephoned to a member of my department on March 27, 1995 at 17:30 hours. The result for copper was 0.468 mg/l. The Permit Daily Max. Discharge Limitation for Outfall 010 copper is 0.25 mg/l.

Condenser cleaning activities were performed from February 23, 1995 at 10:00 hours to March 4, 1995 at 22:00 hours during the Nine Mile Point Nuclear Station Unit One (NMP-1) refuel outage. During the cleaning activities the condenser was dewatered and normal circulating water flow was isolated in support of a forebay cleaning for zebra mussels. The condenser tubes were cleaned using a pressurized water lance and the water and sludge was collected inside of the outlet side of the condenser in a temporarily bermed area. The water was continually pumped from this location to storage tanks outside of the building and on March 6, 1995 the sludge was also pumped to the storage tanks. The wastes will be sent to facilities which are permitted to handle these types of wastes.

ATTACHMENT I (Cont)

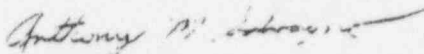
W. McCarthy, P.E.
NYSDEC, 3/29/95
Page 2

Residual copper from the tube cleaning activities is the cause of the exceedence. Condenser tube cleaning activities have been completed. Following the initiation of the circulating water flow, the suspended solids were also measured at the discharge for the subject outfall and the solids level subsided within approximately one hour. Therefore, it is believed based on the behavior of the solids in the discharge following the initiation of the circulating water flow, that the conditions causing the exceedence are not continuing and recurrence is not expected. Additionally, the circulating water pumps were again isolated on March 26, 1995 at 07:10 hours to support other plant tests associated with the restart of NMP-1.

The discharge for Outfall 010 was sampled during the cleaning time frame (February 28, 1995) when the circulating water pumps were isolated and the condenser had drained to below the level of the tubes. During this time, only one service water pump was operating and discharging to the Outfall 010 discharge. No water was flowing through the condenser. The copper result on the sample was < 0.020 mg/l, indicating that no copper contamination from the condenser was affecting the outfall. The outfall was again sampled on March 28, 1995 when conditions were the same as just described with the circulating water pumps isolated. The copper result was the same, < 0.020 mg/l, indicating that no copper contamination was affecting the outfall when the circulating water pumps were isolated. The outfall will be resampled for copper when circulating water flow is re-established. The start up has been planned for the last week of March.

If you have any questions relative to this matter, please contact me at (315) 349-1456.

Sincerely,



Anthony M. Salvagno
Acting Supvr. Env. Protection

xc L.C. Flocke, NYSDEC

SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact William McCarthy DEC Region: 7

Report Type: 5 Day Permit ^{Exceedence} Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Nine Mile Point Nuclear Station

Date of noncompliance: 3-25-95 Location (Outfall, Treatment Unit, or Pump Station): 010

Description of noncompliance(s) and cause(s): See Attached

Has event ceased? (Yes) (No) If so, when? 1820 hrs Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 3-25-95 18:20 (AM) (PM) End date, time of event: 3-25-95 18:20 (AM) (PM)

Date, time oral notification made to DEC? 3-28-95 14:55 (AM) (PM) DEC Official contacted: Kevin Hanigan

Immediate corrective actions: See Attached

Preventive (long term) corrective actions: See Attached

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: 1 1

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Anthony M. Salvano Title: Acting Supervisor Environmental Date: 4-27-95

Phone #: (315) 349-256 Fax #: (315) 349-1070

Report of Noncompliance Event (Cont)

Section 2

Description of Noncompliance and Cause:

Condenser cleaning activities were performed from February 23, 1995 at 1000 hours to March 4, 1995 at 2200 hours during the Nine Mile Point Nuclear Station Unit One (NMP-1) refuel outage. During the cleaning activities the condenser was dewatered and normal circulating water flow was isolated in support of forebay cleaning for zebra mussels. The condenser tubes were cleaned using a pressurized water lance. Since the circulating water flow was isolated (due to divers in the forebay for zebra mussel cleaning activities), the water and sludge was collected in the waterbox of the outlet side of the condenser in a temporarily bermed area. This water was continually pumped from this location to storage tanks outside of the building and on March 6, 1995 the sludge was also pumped to the storage tanks. These materials will be sent to facilities which are permitted to handle these types of materials. A sample was taken on March 25, 1995 at 1820 hours following the start up of one of the circulating water pumps (March 25, 1995 at 1815 hours). The sample was analyzed by a vendor laboratory and the results were telephoned to our Environmental Protection Department on March 27, 1995 at 1730 hours. The result for copper was 0.468 mg/l. The permit Daily Max. Discharge Limitation for Outfall 010 copper is 0.25 mg/l.

Residual copper from the tube cleaning activities is the cause of the exceedence. Condenser tube cleaning activities had been completed three weeks prior to the restart of the circulating water pumps on March 25, 1995. Therefore, the initial high results were due to a flushing action of the condenser.

Immediate Corrective Action:

Following the initiation of the circulating water flow on March 25, 1995, the suspended solids were also measured at the discharge for the subject outfall in support of the zebra mussel cleaning activities. The solids level subsided within approximately one hour. Therefore, it is believed based on the behavior of the solids in the discharge following the initiation of the circulation water flow, that the conditions causing the copper level exceedence did not continue and recurrence was not expected. Additionally, the circulating water pumps were again isolated on March 26, 1995 at 0710 hours to support other plant tests associated with the restart of NMP-1.

Other sample results taken while condenser tube cleaning was in progress and after the circulating water pumps were turned off (on February 28, 1995 and March 28, 1995, respectively) were both <0.020 mg/L for copper. Also additional samples were collected on March 30, 1995 immediately following the restart of the circulating water pumps and up to 1 hour post pump start. The initial sample result was 0.028 mg/l and all other sample results were <0.020 mg/l. These results are all well below the outfall permit limitation of 0.25 mg/l and supports the conclusion that the initial high copper level results on March 25, 1995 represented a one time flushing action of the condenser. Therefore, any impact to the environment is considered to be negligible.

Preventative (long term) Corrective Action:

Future condenser tube cleaning operations which may be impacted by other parallel operations (ie., zebra mussel forebay cleaning) will be coordinated/planned such that residual copper considerations will be addressed.

**DISCHARGE MONITORING REPORT
PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
APRIL 1995**

COMMENTS

UNIT 1

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 1 Outfall 010 for Betz Clam-Trol and Actibrom (TRO) as there were no Clam-Trol or TRO additions during April 1995.
2. For Outfall 030 (Sewage Treatment Plant), the 30 day geometric mean for fecal-coliform exceeded the permit limit of ≤ 200 mpn/100ml. Fecal-coliform results were discussed with NYS DEC Region 7 personnel on April 7, 1995 and on April 25, 1995. This exceedance is documented on the enclosed Report of Non-Compliance Event form (see Attachment 1). Also, copies of the individual laboratory analysis report forms are enclosed (see Attachment 2) as requested by the Region 7 office during phone conversations on the above mentioned dates.

Unit 2

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 2 Outfall 040 for Betz Clam-Trol and Copper-Trol, as there were no Clam-Trol or Copper-Trol additions during April 1995.
2. On April 8, 1995, Unit 2 was shut down for a scheduled refueling outage. By April 18, 1995, the Unit 2 Circulating Water System (Cooling Tower System) was dewatered for system maintenance while Unit 2 was shut down. Therefore, twice per week pH grab samples were not obtained from Outfall 040 once the system was dewatered. Data included under Outfall 040 was obtained from the period of time when the Circulating Water System was operable, until it was dewatered on April 18, 1995.
3. On April 7, 1995, at approximately 1406 hours, a drum containing suspected oily water and solids from a sump cleaning operation fell from a truck during transport at the Nine Mile Point Unit 2 (NMP-2) facility. The impact of the fall caused a spill of most of the drum contents to the blacktop.

A notification was made to the NYSDEC spill hotline on Sunday, April 9, 1995 and was recorded as spill #95-00334.

Additional telephone notifications were made to NYSDEC Region 7 regarding this incident and detailed information was provided in written follow-up to the Region on April 21, 1995 and on May 4, 1995.

4. On April 28, 1995, approximately 1500-2000 gallons of service water (lake water) overflowed to the switch gear room/battery room floors located in the control building. Subsequently, due to energized switch gear equipment in the room, the water was allowed to flow out of a control building door to a storm drain (MH #315). The cleanliness of the floors in the flow path was very good, i.e., clean tile or painted floors with no materials stored in flow path.

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APRIL 1995**

COMMENTS

4. (cont.)

The events that led up to this situation are as follows:

- A service water line high point valve(s) on Unit cooler 108D in the control building on Division II (Div II) service water had been acting as a vent valve for the drain-down of service water to radwaste inside of the reactor building.
- When the drain-down to radwaste was isolated, the Div II service water line continued to fill due to an unrealized leak by of a cross-tie valve from the Division I service water. Eventually the Div II line overflowed into the switch gear/battery rooms in the control building, which is outside of the radiologically controlled area. No activity (radioactivity) is associated with this event.

Some of the water was contained in the upper area of the unit cooler room and this water was drained to sump #4 in the control building. Sump #4 discharges to SPDES Outfall 007 and a sample was subsequently obtained and analyzed for total suspended solids, oil and grease and pH. The analysis results were all within the requirements of the SPDES Permit for Outfall 007, "Floor and Equipment Drains", and are reflected in the Outfall 007 pre-printed DMR form for April 1995. The normal drain point for this Outfall 007 location is to the perimeter drain system (Outfall 001) at or about MH #315 (i.e., the same manhole location which the water from the floor areas had flowed to). This information was provided to NYSDEC Region 7 on May 3, 1995 by telephone notification.

(AMS95.033)

SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr William McCarthy DEC Region: 7

Report Type: 5 Day Permit ^{Exceedence} Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Nine Mile Point Nuclear Station

Date of noncompliance: 04/04/95 Location (Outfall) Treatment Unit, or Pump Station: 030

Description of noncompliance(s) and cause(s): See Attached

Has event ceased? (Yes) (No) If so, when? 4/26/95 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 4/4/95 04:20 (AM) (PM) End date, time of event: 4/26/95 13:40 (AM) (PM)

Date, time oral notification made to DEC: 4/7/95 16:20 (AM) (PM) DEC Official contacted: McWilliam McCarthy

Immediate corrective actions: See Attached

Preventive (long term) corrective actions: See Attached

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: 1/1

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Anthony M. Sabragno Title: Acting Supv. Envir. Prot. Date: 5/25/95

Phone #: (315) 349-1456 Fax #: (315) 349-1070

Report of Non-Compliance Event

Section 2

Description of Noncompliance and Cause:

Outfall 030 was sampled on April 4, April 10 and April 18, 1995 and the results were > 160,000mpn/100ml, 300mpn/100ml and 24,000mpn/100ml, respectively. Additionally, on April 26, 1995, Outfall 030 was sampled twice with one of the samples being split and the samples were analyzed by two independent laboratories. The split sample results were 7mpn/100ml for both independent laboratory analyses and the second sample result, analyzed at one laboratory only, was 8mpn/100ml. One of the split sample results (i.e., 7mpn/100ml) and the 8mpn/100ml result were included along with the April 4, April 10 and April 18, 1995 results for the computation of the geometric mean (30 day). The geometric mean (30 day) of > 578mpn/100ml is greater than the SPDES Permit limitation of $\leq 200/100\text{ml}$. The situation was discussed with the NYSDEC Region 7 Office on April 7 and April 25, 1995.

The apparent cause of the exceedance of the NYSDEC SPDES Permit fecal coliform limit for Outfall 030 (Sewage Treatment Plant effluent) is due to the more restrictive limitation placed on chlorine for Outfall 030 under the new SPDES Permit (EDP 12/1/94) thus reducing the ability to disinfect the Outfall 030 effluent. The new Permit has reduced the amount of chlorine that is able to be injected by a factor of approximately between 6 to 9 versus the old Permit.

Immediate Corrective Actions:

A chemical use request has been submitted to the NYSDEC (letter from Anthony M. Salvagno to Barry Borrow, dated April 4, 1995) to request the use of a dechlorination agent and related modification to the Sewage Treatment Plant. The request has been received and reviewed by the Department with a draft amended permit issued requiring a 30 day public comment period.

The readiness for the installation of a dechlorination delivery system at the Sewage Treatment Plant (STP) has been established and the operation and condition of the STP will be reviewed by an outside consultant for the purpose of providing recommendations.

Preventive (long term) Corrective Actions:

Implement final permanent modification for STP sodium sulfite dechlorination pending review and approval by DEC.

Environmental Impact

Considering the size of the receiving body of water (Lake Ontario) and the average water temperature of 40.7°F (during this time period), the survivability of the bacteria is questionable. Therefore, the environmental impact is negligible.



Environmental LABORATORY SERVICES

7290 Caswell Street, Hancock Air Park North Syracuse, NY 13212
 (315) 458-8033 FAX (315) 458-0249 (800) 842-4667

NIAGARA MOHAWK POWER CORP.
 P.O. BOX 63

PROJECT #: 950581
 RECEIVED: 04/04/95

LYCOMING NY 13093
 ATTN: MR. TONY SALVAGNO

P.O. # 78168
 CLIENT JOB NUMBER:

TEST PERFORMED	RESULTS	UNITS	DATE PERFORMED	METHOD NUMBER	PERFORMED BY
SAMPLE #: 98726	CLIENT SAMPLE ID: NMP SEW. EFF		DATE SAMPLED: 04/04/95		
FECAL COLIFORM (MPN)	> 160000	MPN INDEX/100mL	04/04/95	SM 16TH 908.C	11246 (NY)
SAMPLE #: 98727	CLIENT SAMPLE ID: NMP SEW. EFF		DATE SAMPLED: 04/04/95		
B.O.D.	7.2	MG/L	04/06/95	EPA 405.1	11246 (NY)
SAMPLE #: 98728	CLIENT SAMPLE ID: NMP SEW. EFF		DATE SAMPLED: 04/04/95		
TOTAL SUSPENDED SOLIDS	4.3	MG/L	04/07/95	EPA 160.2	SM
SAMPLE #: 98729	CLIENT SAMPLE ID: AER ZONE 1		DATE SAMPLED: 04/04/95		
TOTAL SUSPENDED SOLIDS	4000	MG/L	04/07/95	EPA 160.2	SM
TOTAL SOLIDS	0.4	PERCENT	04/04/95	EPA 160.3	SM
SAMPLE #: 98730	CLIENT SAMPLE ID: AER ZONE 2		DATE SAMPLED: 04/04/95		
TOTAL SUSPENDED SOLIDS	3300	MG/L	04/07/95	EPA 160.2	SM
TOTAL SOLIDS	0.4	PERCENT	04/04/95	EPA 160.3	SM

Handwritten signature

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Holding Certifications in Connecticut, Delaware, Maryland, Massachusetts, New Hampshire, New York, Pennsylvania, and Rhode Island



Environmental LABORATORY SERVICES

7280 Caswell Street, Hancock Air Park
(315) 458-8033

North Syracuse, NY 13212
FAX (315) 458-0249

(800) 842-4667

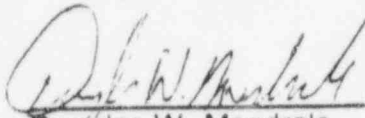
NIAGARA MOHAWK POWER CORP.
P.O. BOX 63

PROJECT #: 950581
RECEIVED: 04/04/95

LYCOMING NY 13093
ATTN: MR. TONY SALVAGNO

P.O. # 78168
CLIENT JOB NUMBER:

TEST PERFORMED	RESULTS	UNITS	DATE PERFORMED	METHOD NUMBER	PERFORMED BY
SAMPLE #:	CLIENT SAMPLE ID: AER ZONE 2		DATE SAMPLED: 04/04/95		


Douglas W. Mendrala
Laboratory Director

04/12/95
Date

All tests performed under NYS ELAP Laboratory Certification # 11375 unless otherwise stated.

Handwritten initials and date: ems 4/20/95

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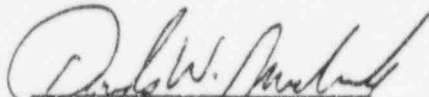
NIAGARA MOHAWK POWER CORP.
P.O. BOX 63

PROJECT #: 950627
RECEIVED: 04/10/95

LYCOMING NY 13093
ATTN: MR. TONY SALVAGNO

P.O. # 78168
CLIENT JOB NUMBER:

TEST PERFORMED	RESULTS	UNITS	DATE PERFORMED	METHOD NUMBER	PERFORMED BY
SAMPLE #: 98912	CLIENT SAMPLE ID: NMP SAMPLE #1		DATE SAMPLED: 04/10/95		
FECAL COLIFORM (MPN)	>1600	MPN INDEX/100mL	04/10/95	SM 16TH 908.C	11246 (NY)
SAMPLE #: 98913	CLIENT SAMPLE ID: NMP SAMPLE #2		DATE SAMPLED: 04/10/95		
FECAL COLIFORM (MPN)	>1600	MPN INDEX/100mL	04/10/95	SM 16TH 908.C	11246 (NY)
SAMPLE #: 98914	CLIENT SAMPLE ID: NMP SAMPLE #3		DATE SAMPLED: 04/10/95		
FECAL COLIFORM (MPN)	300	MPN INDEX/100mL	04/10/95	SM 16TH 908.C	11246 (NY)


Douglas W. Mendrala
Laboratory Director

04/13/95
Date

All tests performed under NYS ELAP Laboratory Certification # 11375 unless otherwise stated.

CME 4/10/95

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 (800) 842-4667

NIAGARA MOHAWK POWER CORP.
 P.O. BOX 63

PROJECT #: 950704
 RECEIVED: 04/18/95

LYCOMING NY 13093
 ATTN: MR. TONY SALVAGNO

P.O. # 78168
 CLIENT JOB NUMBER:

TEST PERFORMED	RESULTS	UNITS	DATE PERFORMED	METHOD NUMBER	PERFORMED BY
SAMPLE #: 99151	CLIENT SAMPLE ID: NMP SEWAGE EFF		DATE SAMPLED: 04/18/95		
COLIFORM, FECAL (MPN)	24000	MPN INDEX/100mL	04/18/95	SM 16TH 908.C	11246 (NY)
SAMPLE #: 99152	CLIENT SAMPLE ID: NMP SEWAGE EFF		DATE SAMPLED: 04/18/95		
B.O.D.	<2	MG/L	04/18/95	EPA 405.1	11246 (NY)
SAMPLE #: 99153	CLIENT SAMPLE ID: NMP SEWAGE EFF		DATE SAMPLED: 04/18/95		
SOLIDS, TOTAL SUSPENDED	4.5	MG/L	04/20/95	EPA 160.2	MM
SAMPLE #: 99154	CLIENT SAMPLE ID: AERATION ZONE 1		DATE SAMPLED: 04/18/95		
SOLIDS, TOTAL SUSPENDED	3360	MG/L	04/20/95	EPA 160.2	MM
SOLIDS, TOTAL	0.5	PERCENT	04/20/95	EPA 160.3	MM
SAMPLE #: 99156	CLIENT SAMPLE ID: AERATION ZONE 2		DATE SAMPLED: 04/18/95		
SOLIDS, TOTAL SUSPENDED	2960	MG/L	04/20/95	EPA 160.2	MM
SOLIDS, TOTAL	0.4	PERCENT	04/20/95	EPA 160.3	MM

CSA 5/4/95

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North Syracuse, NY 13212

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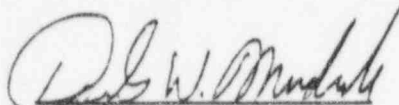
NIAGARA MOHAWK POWER CORP.
P.O. BOX 63

PROJECT #: 950704
RECEIVED: 04/18/95

LYCOMING NY 13093
ATTN: MR. TONY SALVAGNO

P.O. # 78168
CLIENT JOB NUMBER:

TEST PERFORMED	RESULTS	UNITS	DATE PERFORMED	METHOD NUMBER	PERFORMED BY
SAMPLE #:	CLIENT SAMPLE ID: AERATION ZONE 2		DATE SAMPLED: 04/18/95		


Douglas W. Mendrala
Laboratory Director

04/26/95
Date

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EMF 5/4/95

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NIAGARA MOHAWK POWER CORP.
P.O. BOX 63

PROJECT #: 950773
RECEIVED: 04/26/95

LYCOMING NY 13093
ATTN: MR. TONY SALVAGNO

P.O. # 78168
CLIENT JOB NUMBER:

TEST PERFORMED	RESULTS	UNITS	DATE PERFORMED	METHOD NUMBER	PERFORMED BY
SAMPLE #: 110036	CLIENT SAMPLE ID: NMP EFF #1		DATE SAMPLED: 04/26/95		
COLIFORM, FECAL (MPN)	37	MPN INDEX/100mL	04/26/95	SM 16TH 908.C	11248 (NY)
SAMPLE #: 110037	CLIENT SAMPLE ID: NMP EFF #2		DATE SAMPLED: 04/26/95		
COLIFORM, FECAL (MPN)	1600	MPN INDEX/100mL	04/26/95	SM 16TH 908.C	11248 (NY)
SAMPLE #: 110038	CLIENT SAMPLE ID: NMP EFF #3		DATE SAMPLED: 04/26/95		
COLIFORM, FECAL (MPN)	7	MPN INDEX/100mL	04/26/95	SM 16TH 908.C	11248 (NY)


Douglas W. Mendrala
Laboratory Director

05/01/95
Date

All tests performed under NYS ELAP Laboratory Certification # 11375 unless otherwise stated.

Handwritten signature and date: 5/5/95

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#030
Duer Hansen

SAMPLE ANALYSIS REPORT

23131-02
LSL Project No.

Jack Mancuso
Reviewed By

4/19/95
Date

Life Science Laboratories, Inc. warrants, to the best of its knowledge and belief, the accuracy of the analytical test results contained in this report, but makes no other warranty, expressed or implied, especially no warranties of merchantability or fitness for a particular purpose. By Client's acceptance and/or use of this report, Client agrees that LSL is hereby released from any and all liabilities, claims, damages or causes of action affecting or which may affect Client as regards to the results contained in this report. Client further agrees that the only remedy available to Client in the event of proven non-conformity with the above warranty shall be for LSL to re-perform the analytical test(s) at no charge to Client.

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Life Science Laboratories, Inc
5854 Butternut Drive
East Syracuse, New York 13057
(315) 445-1105
NYS DOH ELAP NO. 10248

** SAMPLE ANALYSIS REPORT **

05/01/95

Niagara Mohawk Power-Lycoming
P.O. Box 63
Lycoming, NY 13093

Contacts: Barb Zacharek
Phone: (315) 349-1248

Sample # 50410977 Project #: L3131 -02
Customer ID: Effluent #1 - 04/26/95
Matrix: NPW Authorization: Ck. 267419

Test Name	Results	Units	Comment	Completed	Initials
Fecal Coliform,MPN SM16th 908.C	13	MPN/100ml		04/26/96	GVK

Sample # 50410978 Project #: L3131 -02
Customer ID: Effluent #2 - 04/26/95
Matrix: NPW Authorization: Ck. 267419

Test Name	Results	Units	Comment	Completed	Initials
Fecal Coliform,MPN SM16th 908.C	2	MPN/100ml		04/26/95	GVK

Sample # 50410979 *Final Eff (Split Sample)* Project #: L3131 -02
Customer ID: Effluent #3 - 04/26/95
Matrix: NPW Authorization: Ck. 267419

Test Name	Results	Units	Comment	Completed	Initials
Fecal Coliform,MPN SM16th 908.C	7	MPN/100ml		04/26/95	GVK

Sample # 50410980 *Final Eff (Split Sample)* Project #: L3131 -02
Customer ID: Effluent #4 - 04/26/95
Matrix: NPW Authorization: Ck. 267419

Test Name	Results	Units	Comment	Completed	Initials
Fecal Coliform,MPN SM16th 908.C	8	MPN/100ml		04/26/95	GVK

**DISCHARGE MONITORING REPORT
PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
MAY 1995**

COMMENTS

UNIT 1

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 1 Outfall 010 for Betz Clam-Trol and Actibrom (TRO) as there were no Clam-Trol or TRO additions during May 1995.
2. For the Sewage Treatment Plant Outfall 030, two samples taken on the same date resulted in fecal coliform values of > 1600 mpn/100mL. However, the 30 day geometric mean for the month was calculated to be 56 mpn/100mL. The sample dates and results are as follows:

<u>Date</u>	<u>Result</u>
May 9, 1995	8mpn/100mL
May 9, 1995	< 2 mpn/100mL
May 16, 1995	> 1600 mpn/100mL
May 16, 1995	≥ 1600 mpn/100mL
May 23, 1995	14mpn/100mL

UNIT 2

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 2 Outfall 040 for Betz Clam-Trol, Slimicide (TRO) and Free Available Chlorine, as there were no Clam-Trol, TRO or Chlorine additions during May 1995.
2. During most of May 1994, Unit 2 was shut down for a scheduled refueling outage and the Unit 2 Circulating Water System (Cooling Tower System) was dewatered for system maintenance. During the outage when the Circulating Water System was dewatered, twice per week pH grab samples were not obtained from outfall 040 due to the system being dewatered. Data included under outfall 040 was obtained from the period of time after the refill of the Cooling Tower Basin when the Circulating Water System was again operable.

**DISCHARGE MONITORING REPORT
PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
JUNE 1995**

COMMENTS

UNIT 1

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 1 Outfall 010 for Betz Clam-Trol and Actibrom (TRO) as there were no Clam-Trol or TRO additions during June 1995.
2. For Outfall 030 (Sewage Treatment Plant), the 30-day geometric mean for fecal-coliform exceeded the permit limit of ≤ 200 mpn/100ml. Fecal-coliform results were discussed with NYS DEC Region 7 personnel on July 5, 1995. This exceedance is documented on the enclosed Report of Non-Compliance Event form (see Attachment 1), which was submitted to the Region 7 office under separate letter dated, July 11, 1995. The use of chlorination and dechlorination for the control of f-coli continues to be optimized and sample holding time has been minimized to the extent practicable. Subsequent fecal-coliform sample analysis results for July 1995 have been below the permit limit. A System Engineer has been assigned to the Sewage Treatment Plant (STP), and a NYS Certified Chief Operator was assigned to the STP effective July 15, 1995. In addition, flow equalization to the STP is being pursued under the direction of the Chief Operator and System Engineer using plant design based equipment which is presently in place.
3. On June 16, 1995, while investigating restricted seal water lines for the service water pumps in the NMP-1 Screenhouse, System Engineering identified that the drain valves on the sand separators used in the supply of service water (lake water) to the seal water lines were closed. In order for the separators to function as designed, the drain valves needed to be opened. Subsequently, on that same day, the drain valves were opened on two such systems which are located in the NMP-1 Screenhouse.

The discharge of the sand separator drain lines is to the Condenser Cooling Water Unit #1 (SPDES Permit Outfall 010) Discharge. Flow through the open drain lines is estimated to be less than approximately 25 gallons per minute by the System Engineer. During normal plant operation, the flow for Outfall 010 is approximately 280,000 gallons per minute. On June 23, 1995, operations personnel and System Engineering identified that this configuration could possibly be outside the requirements of the SPDES Permit due to the potential discharge of solids. Solids is not a listed effluent parameter for Outfall 010. Furthermore, a discussion with several operators revealed that in some instances in the past, the valves were opened to flush the drains during operator rounds. This concern was brought to the attention of the Environmental Protection Department on June 23, 1995, via an internal deviation event report process. The drain valves have been closed via a mark-up (on June 23, 1995) until a resolution is determined.

This situation was discussed with NYS DEC Region 7 personnel on June 28, 1995 and a written follow-up letter was provided to the region on July 6, 1995 (see attachment 2).

**DISCHARGE MONITORING REPORT
PERMIT NUMBER NY-000-1015
NINE MILE POINT NUCLEAR STATION
JUNE 1995**

COMMENTS

UNIT 2

1. On the attached SPDES/DMR forms, "NODI C" was noted for Unit 2 Outfall 040 for Betz Clam-Trol and Copper-Trol, as there were no Clam-Trol or Copper-Trol additions during June 1995.
2. The Unit 2 strip chart recorder used to measure Outfall 040 (Cooling Tower Blowdown and Service Water) discharge flow was inoperable for a short period in June 1995, due to testing/calibration. Maximum water flow data for the period prior to or following the testing/calibration were used during this period.

(AMS95.049)

JUNE 1995

ATTACHMENT 1

July 11, 1995

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, New York 13204-2400

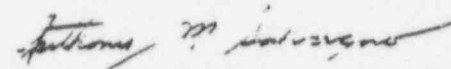
SUBJECT: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 030 Fecal-Coliform Exceedance

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the fecal-coliform exceedance that we discussed during our telephone conversation of July 5, 1995. As we discussed, the submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the June 1995 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact me at (315) 349-1456.



Anthony M. Salvagno
Acting Supervisor
Environmental Protection

/dar

pc: M.J. McCormick Jr.
T.W. Roman
G.M. McPeck
W.J. Holzhauser, Esq.
C.D. Howes
G.A. Corell
DMR File

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: 5 Day Permit ^{Exceedance} ~~Noncompliance~~ Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: Nine Mile Point Nuclear Station

Date of noncompliance: 6 27 95 Location: Outfall Treatment Unit or Pump Station: 030

Description of noncompliance(s) and cause(s): SEE ATTACHED

Has event ceased? (Yes) (No) If so, when? 6/28/95 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 6 27 95 08 50 (AM) (PM) End date, time of event: 6 28 95 09 20 (AM) (PM)

Date, time oral notification made to DEC: 7 5 95 2 30 (AM) (PM) DEC Official contacted: Mr. Wm. McCarthy

Immediate corrective actions: The use of chlorination and dechlorination will continue to be optimized. The hold time for analytical samples will be minimized to the extent practicable.

Preventive (long term) corrective actions: Flow equalization for the plant will be tested and evaluated for implementation following the acquisition of base-line data on the use of the dechlorination system.

SECTION 3

Complete this section if event was a BYPASS:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: _____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Anthony M. Solovay Title: Acting Sup. Envir Prot Date: 7/11/95
Phone #: (315) 349-1456 Fax #: (315) 349-1070

Report of Noncompliance Event

SECTION 2

Description of noncompliance(s) and cause(s): The 30 day geometric mean of 6 fecal coliform samples for the month of June 1995 was 240MPN/100ml. The Permit limit expressed as a 30 day geometric mean is ≤ 200 MPN/100ml. The cause is attributable to the stricter limit placed on chlorine for the Outfall in the newly issued Permit (12/1/94) and the lack of time for optimization of the dechlorination system following permit modification effective 6/19/95. Additionally, one of the samples taken after dechlorination had been initiated was performed by the contractor laboratory according to the required analytical methodology, but the holding time encroached on the limit specified in the method and the possibility of fecal coliform regrowth in the sample is suspected.

JUNE 1995

ATTACHMENT 2



NINE MILE POINT NUCLEAR STATION / P. O. BOX 63, LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

AMS95.042

July 6, 1995

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, New York 13204-2400

Subject: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Sand Separators

Dear Mr. McCarthy:

This letter is submitted per your request following our telephone conversation of June 28, 1995, regarding the use of the subject sand separators at Nine Mile Point Unit One (NMP-1). This letter will be referenced in the June 1995 DMR.

On June 16, 1995, while investigating restricted seal water lines for the service water pumps in the NMP-1 Screenhouse, System Engineering identified that the drain valves on the sand separators used in the supply of service water (lake water) to the seal water lines were closed. In order for the separators to function as designed, the drain valves needed to be opened. Subsequently, on that same day, the drain valves were opened on two such systems which are located in the NMP-1 Screenhouse.

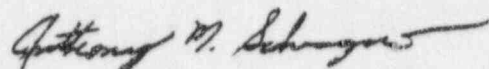
The discharge of the sand separator drain lines is to the Condenser Cooling Water Unit #1 (SPDES Permit Outfall 010) Discharge. Flow through the open drain lines is estimated to be less than approximately 25 gallons per minute by the System Engineer. During normal plant operation, the flow for Outfall 010 is approximately 280,000 gallons per minute. On June 23, 1995, operations personnel and System Engineering identified that this configuration could possibly be outside the requirements of the SPDES Permit due to the potential discharge of solids. Solids is not a listed effluent parameter for Outfall 010. Furthermore, a discussion with several operators revealed that in some instances in the past, the valves were opened to flush the drains during operator rounds. This concern was brought to the attention of the Environmental Protection Department on June 23, 1995, via an internal deviation event report process. The drain valves have been closed via a mark-up (on June 23, 1995) until a resolution is determined.

AMS95.042
7/6/95, Pg. 2

A partial copy of Piping and Instrument Drawing (No. C-18022-C) showing the sand separators and a "Detail" sketch of a separator from another plant drawing are included as Attachments 1 and 2. Niagara Mohawk Power Corporation plans on applying for a modification to it's SPDES Permit to address this issue as well as the issue of circulating and service water forebay cleaning around October 1995.

Should you have any questions concerning this matter, please contact me at (315) 349-1456.

Sincerely,

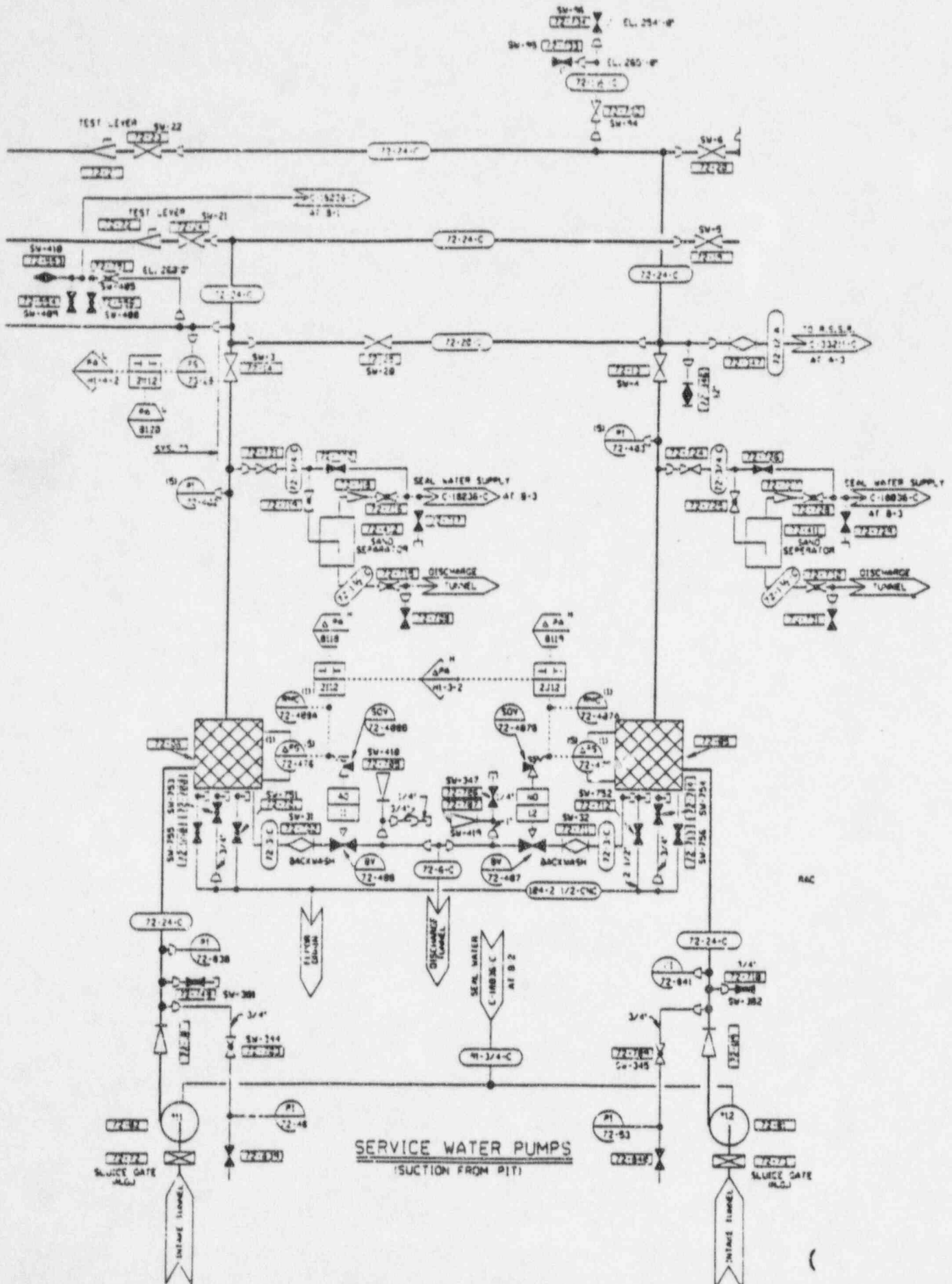


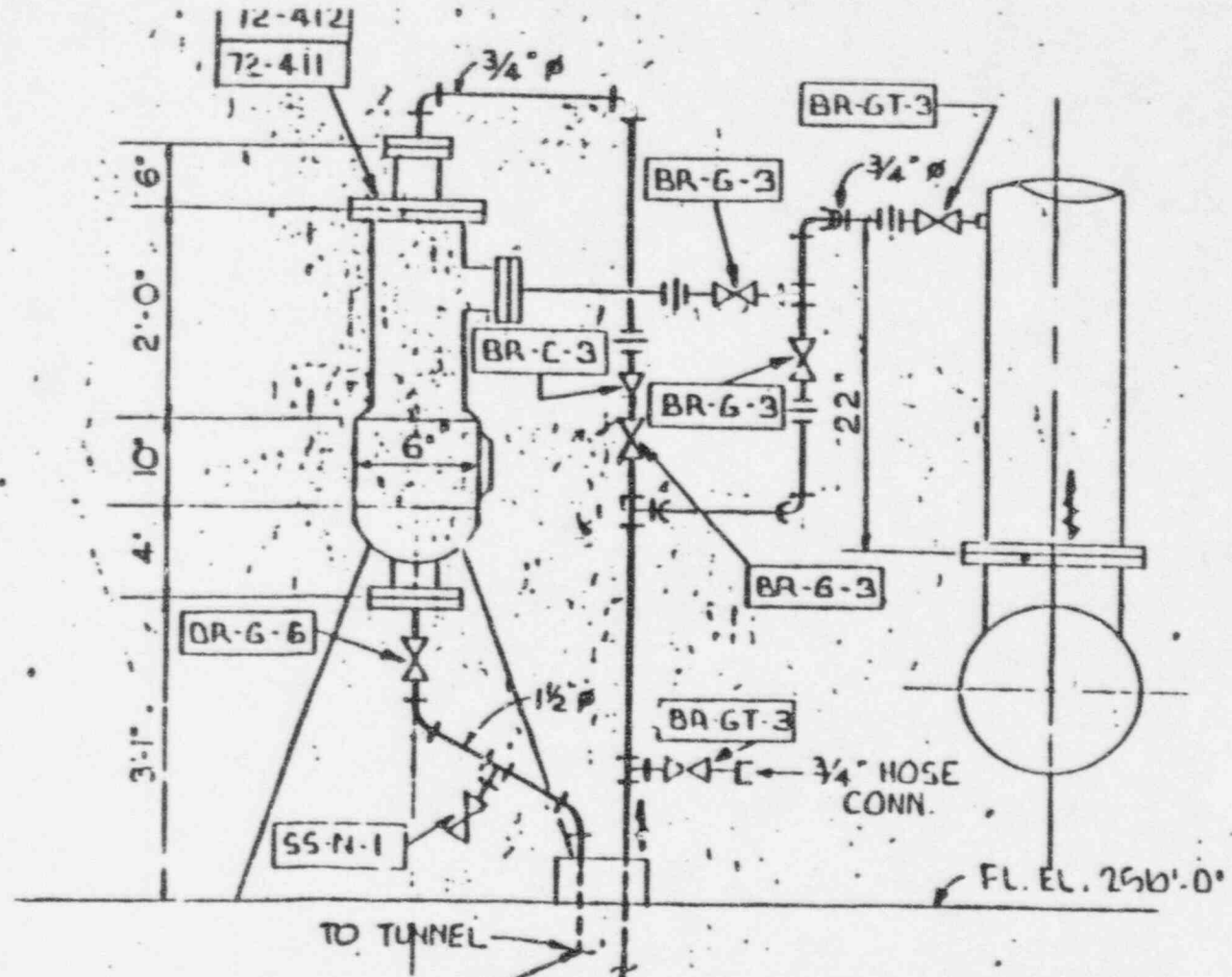
Anthony M. Salvagno
Acting Supervisor
Environmental Protection

/dar

pc: M.J. McCormick Jr.
T.W. Roman
G.M. McPeck
W.J. Holzauer, Esq.
✓C.D. Howes
DMR File

ATTACHMENT 1





ATTACHMENT 2

FOR CONT. EEE
DWG C-18530-C
(S15.)

SEAL WATER SUPPLY
FOR CONT. SEE DWG.
C-18329-C (S15)

DETAIL "A"
"LAKOS" SEPERATOR
N.T.S. 2 REQ'D