

**GPU Nuclear Corporation**

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Writer's Direct Dial Number:

July 9, 1984

Mr. John Gaston, Director  
Division of Water Resources  
NJ Department of Environmental Protection  
P.O. Box CN-029  
Trenton, NJ 08625

Dear Mr. Gaston:

Subject: GPU Nuclear (GPUN)  
NJPDES Permit NJ 0031097  
Noncompliance Report No. 0031097/84/01

As a result of a recently conducted review of the Forked River NJPDES Program, it was determined that a noncompliance existed with the sampling methodology for Total Suspended Solids (TSS) as outlined in section A.1 of the subject permit. During the reporting periods beginning with the May 1, 1980 through October 31, 1980 time frame to the November 1, 1983 through April 30, 1984 time frame; grab samples had been collected for TSS for discharge serial number (dsn) 002, instead of composite sampling as specified in the permit. Upon making this determination, GPUN immediately initiated corrective action by resuming the use of a composite sampler for dsn 002.

Investigation of this matter indicates that the deviation from the prescribed method has a twofold cause. First, it is suspected that the initiation of taking grab samples was the result of the composite sampler becoming inoperative due to component failure. Second, during this same period of time the responsibility for the Forked River NJPDES program was transferred from Corporate Headquarters personnel to Site personnel. Consequently, the use of the composite sampler was not resumed and the practice of taking grab samples continued.

GPUN recognizes that composite sampling is required when flow conditions and suspended load are highly variable. However, basin #6, from which dsn 002 originates, is a stilling basin utilizing the standpipe method for both inflow and outflow. Standpipes generally induce smooth flow conditions and do not generate large amounts of suspended material. Field observations at basin #6 during a variety of conditions have demonstrated that it is always clear and appears to contain low concentrations of TSS. An analysis of both grab and composite sample data collected have shown that greater than 80% of all data have had a TSS value of less than 1 mg/l, greater than 94% of all data have had TSS concentrations of less than 3 mg/l and the highest daily maximum recorded was 32 mg/l; the permit specifies a maximum limit of 100 mg/l. In addition, the Forked River site is no longer an active construction site, and

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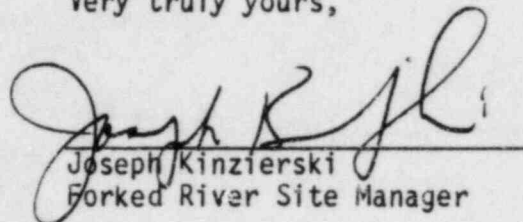
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was not an active site during any part of the noncomplying period; consequently basin #6 receives primarily groundwater from the dewatering operation, which is inherently low in total suspended solids.

Therefore, based on field observations, the inactive state of the Forked River site, and the data analysis presented, it is not anticipated that environmental damage resulted from not taking composite samples during the period of noncompliance.

If you have any questions or require additional information please do not hesitate to contact Mr. Douglas Moore of our Licensing and Regulatory Affairs Department at (609)971-4630.

Very truly yours,

  
Joseph Kinzierski  
Forked River Site Manager

JK:DM:dam

cc: Dr. Richard A. Baker, Chief  
Permits Administration Branch  
Planning & Management Division  
U.S. Environmental Protection Agency  
Region II  
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NJ Bureau of Radiation Protection  
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Regional Administrator  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
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Director  
Office of Nuclear Reactor Regulations  
U.S. Nuclear Regulatory Commission  
Docket No. 50-219  
Washington, DC 20555  
C/o Distribution Services Branch, DDC, ADM

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