



PECO NUCLEAR

A Unit of PECO Energy

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April 28, 1996

Steven J. O'Neil
Chief, Operations Section
Department of Environmental Protection
Bureau of Water Quality Management
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428

Subject: Limerick Generating Station, Units 1 and 2
Non-Compliances with Limerick Generating Station NPDES Permit No.
PA 0051926 and Bradshaw Reservoir NPDES Permit No. PA 0052221

Dear Mr. O'Neil:

DESCRIPTION OF THE NON-COMPLIANCES AND CORRECTIVE ACTIONS

On February 23, 1996, an audit of NPDES activities at the Limerick Generating Station (LGS) was performed by the PECO Energy Corporate Environmental Group. This audit was performed because of specific NPDES Permit compliance issues that were identified during Department of Environmental Protection (DEP) Agency inspections at other PECO Energy facilities. The audit team identified seven issues of administrative non-compliance or ambiguity with the two subject NPDES permits. There were no potential/actual impacts on the environment as a result of these permit issues.

LGS Permit No. PA 0051926 had the following five (5) administrative issues.

1. The sheets used to collect data for the DMR did not indicate the date, time and person that collected the sample. This is contrary to PART A 3.f.1 & 2, *Recording of Results*, that requires "The exact place, date, and time of sampling or measurement;" and "The person(s) who performed the sampling or measurement." To correct this administrative issue, LGS Chemistry procedure, CH-1069, *Sampling for NPDES Requirements*, has been revised to require recording the sample collection date and time, and the name of the person collecting the sample on the sample data sheets.

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2. The confirmation weighing for total suspended solids (TSS) was not recorded in the weighing logbook, although the weighing was performed according to approved Chemistry procedure CH-C-309, *Determination of Solids*. This is contrary to PART A 3.f.1 & 2, *Recording of Results*, which requires recording "The results of such analyses." To correct this issue, the Station Chemistry lab currently records all weighing used to calculate TSS in the weighing logbook. In addition, procedure CH-C-309 will be revised by May 30, 1996 to require the documentation of all weighings.
3. When the sample results were less than the Minimum Detection Limit (MDL), a value of one-half of the MDL was used in the monthly calculation. This resulted in a conservative value being reported in the monthly DMR. The requirements for calculating average monthly results are contradictory within the permit issued. One set of instructions, *Instructions for Utilizing National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report*, paragraph 3 states, "For computing monthly averages, all 'less than' sample results may be counted as zero values." The next page states, "To calculate averages of value expressed as 'less than' numbers," use the "less than" value and report the average as "less than." In an effort to clarify the requirements, this issue was discussed with the DEP. As a result of this discussion, PECO Energy has determined that a zero value will be used to calculate the monthly MDL average when the sample results are less than the MDL.
4. Values used to report monthly averages were not included in the remarks section of the monthly DMR. This is required by *Instructions for Utilizing National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report*, paragraph 3 which states that "All sample results used in computing monthly average values must be reported on the DMR form in the DMR comment section." All data used to determine previous monthly averages are maintained in the LGS Chemistry Section files for the required 3 year retention period, and are available for audit. Since the space provided in the DMR comment section is not adequate to list the values used, LGS Chemistry will attach a supplemental form containing all values used to complete the monthly DMR.
5. The daily maximum flow value for Outfall 001, in million gallons per day, did not include a daily measurement of Spray Pond discharge flow. This value was reported weekly in the Sunday Outfall 001 total, and therefore, was reflected correctly in the monthly average flow determination. Routine test procedure, RT-6-111-640-0, which provides for collecting this flow data on a daily basis, has been revised to require including the Spray Pond data and incorporating this data into the daily total for Outfall 001.

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Bradshaw Reservoir Permit No. PA 0552221 had the following two (2) administrative issues.

1. Several monthly DMRs contained values less than the MDL and were reported as not detectable (ND). This is contrary to *Instructions for Utilizing National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report*, paragraph 3, "Results shall not be reported as 'Not Detectable' or ND." The notation of ND was only used in the reporting of mercury values. To correct this concern, all values will be reported as less than the MDL on future DMR forms.
2. Calibration and maintenance records were not being maintained for continuous monitoring equipment. This is contrary to PART A 3.g, *Records Retention*, which requires all records to be maintained for three years. To correct this concern, all calibration and maintenance is now being documented and these records are being maintained for the required three year retention period. A program to administratively control this item is in place using a site recurring task work order.

CAUSES OF THE NON-COMPLIANCES

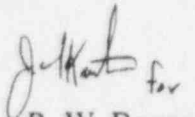
The causes of the seven issues were inadequate administrative or procedural controls, permit ambiguity, and misinterpretation of the administrative requirements for LGS NPDES Permit No. PA 0015926 and Bradshaw Reservoir NPDES Permit No. PA 0052221.

ADDITIONAL ACTIONS TO PREVENT FUTURE RECURRENCES

The responsible individuals for compiling the data to complete the monthly DMRs have attended the "Discharge Monitoring Reports" session presented by the Pennsylvania DEP Agency. The individuals have gained a better understanding of the requirements to ensure compliance with the permits.

If there are any questions or concerns, please do not hesitate to contact Mr. James L. Kantner at (610) 718-3400.

Sincerely,


R. W. Boyce

DJP/DMS

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