Northeast Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

October 30, 1996
SES-96-GN-040

D10444

Ms. Michelle DiNoia
Bureau of Water Management
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Reference:
1. Letter (D10112), D. B. Miller, Jr. to M. DiNoia, dated August 21, 1996
2. Letter (D07329), D. B. Miller, Jr. to M. DiNoia, dated February 10, 1994.
3. Letter (D07519), D. B. Miller, Jr. to M. DiNoia, dated April 14, 1994.

Dear Ms. DiNoia:

Millstone Station
NPDES Permit No. CT. 0003263
DMR Data Corrections

As a result of a voluntary internal environmental audit conducted to evaluate Millstone Station's compliance with NPDES requirements, Northeast Nuclear Energy Company (NNECO), Reference 1, submitted corrected Discharge Monitoring Reports (DMRs) for December 1994 through December 1995. These corrected DMRs addressed certain information previously provided for Millstone Unit 3, as this unit was the focus of our internal audit. Also provided at that time, consistent with DEP's request, were additional chlorine sampling data associated with the corrected DMRs. In that submittal, NNECO committed to the same scope of review at Millstone Unit 3 beginning with the January, 1993 DMR. Accordingly, enclosed are corrected DMRs and supporting data from January, 1993 through May, 1996.

Additionally, we are providing the DEP with further information on three other compliance matters: 1) Follow up to an exceedance report dated February 10, 1994 for DSN 006; 2) DSN 001C-3 sulfuric acid usage; and 3) Unit 2 seal water discharge. DEP (Michael Hart) was notified of all of the foregoing by phone on October 11, 1996.

The following provides a discussion of the matters identified above.

IE25 1/1

DMR CORRECTIONS

A) Findings

1) Unit 3 Auxiliary Boiler Blowdowns --DSN 001C-6(b)

NPDES testing of the blowdown of the Unit 3 Auxiliary boiler is based on testing of the Unit 3 Auxiliary boiler chemistry, which is performed prior to the time of discharge. The discharge limit for hydrazine at this discharge point (DSN 001C-6 (b)) is 75 ppm. A review of plant logs for October, 1993 indicates levels of hydrazine in the blowdown of the Unit 3 Auxiliary boiler above 75 ppm prior to the time of discharge.

Further, while DMRs for November, 1993 and September, 1994 indicate "No Discharge," a review of plant logs indicates that blowdowns were also performed during these months. There were no exceedances of NPDES permit limitations resulting from the blowdown of the Unit 3 Auxiliary boiler during these two events at DSN 001C-6 (b).

In several other months between January, 1993 and May, 1996, it is not possible to confirm whether blowdowns occurred. Nevertheless, we are correcting the DMR forms to indicate "Not Sampled". Should additional information be identified, we will provide this information to the DEP.

Corrected DMR pages for DSN 001C-6(b) are included in Attachment 1. Supporting sampling data for the auxiliary boilers are enclosed as Attachment 2.

2) Unit 3 Steam Generator Blowdowns -- DSN 001C-1

Certain DMRs between January, 1993 and May, 1996 have been revised to reflect the inclusion of all sampling data, consistent with our discussions with you, taken during a particular month. In some instances, we are correcting certain DMR forms to indicate "Not Sampled". Corrected DMR pages for DSN 001C-1 are included in Attachment 1. Supporting data for the Unit 3 Steam Generator are enclosed as Attachment 3.

3) Service Water System Chlorine Sample Analysis -- DSN 001C-5

As discussed in Reference 1, to ensure that sufficient chlorine is injected to minimize fouling of plant safety systems and to verify that the chlorine levels are below allowable limits, samples for analysis of chlorine in the Unit 3 service water systems are taken daily at the approved sampling location and using an EPA approved method. One of these weekly samples (usually Thursday) had been used historically as the weekly grab sample required by the permit. As a consequence, the additional DMRs reviewed reported only the Thursday sampling.

Accordingly, corrected DMR pages for DSN 001C-5 which reflect the daily chlorine values for this discharge are included in Attachment 1. Recognizing the DEP's request to report all service water chlorine sample results, the daily chlorine sample results are attached for this time period as Attachment 4. Of the over 1,000 results being provided, there were nine previously unreported exceedances in 1993 (January 13, February 28, March 28, June 23, June 28, July 10, August 23, September 18 and September 20). Measures were implemented during this time period to prevent re-occurrence. There were no unreported exceedances of service water system chlorine in 1994 for DSN 001C-5.

4) Stormwater Discharges

Certain previously submitted DMRs during the period January, 1993 through May, 1996 reported "No Discharge" for storm drains that required sampling when oil separator discharges occur. A review of data from the Northeast Regional Climate Center and NOAA indicates that rainfall occurred in the nearby Town of Groton during this time period. Absent flow data from the storm drain, it is not possible to definitively determine whether there was a large enough rainfall in any one month to cause discharges from oil separators (the only time monitoring is required). Nevertheless, we are correcting DMR forms for DSNs 005, 008, 009, and 016 to read "Not Sampled". These are enclosed within Attachment 1.

B) Corrective Action

Millstone Station is committed to ensuring timely, accurate and complete DMR reporting.

As a result of the findings reported to you on August 21, 1996 and in this letter, procedures and programs are being revised to ensure that all sampling at approved locations and with approved methods is properly reported with the monthly DMR. Further, an investigation will be initiated to determine the root cause behind the reporting issues identified and discussed above. In addition, a training plan will be developed for Station personnel to provide further guidance regarding compliance with NPDES reporting requirements.

With respect to stormwater sampling, procedures will be developed to more clearly assign responsibility for this sampling requirement.

II. Other Issues

A) DSN 006 Hydrazine release on February 5, 1994 -- Additional Information

A review of records concerning a hydrazine release previously reported to DEP (Reference 2 & 3) indicates that plant personnel used hydrogen peroxide to consume the hydrazine remaining in the isolated sump.

As a result of this review, plant records also indicate that hydrogen peroxide has been added in several instances to tanks for control of odors presumably caused by biological growth. Discharges were not made until peroxide residuals were below detectable levels. Our review into these matters is continuing.

B) DSN 001C-3

To ensure that Total Suspended Solids (TSS) discharge limits are met at DSN 001C-3 (Unit 3 Low Level Radiation Waste Drain Tank discharge), sulfuric acid has been added periodically to these tanks. Chemical analysis suggests that calcium carbonate from the Unit 3 containment sump is contributing to the TSS. Acid additions also minimize clogging of in-line filters, thereby reducing the frequency of filter replacement, personnel radiation exposure and low level radioactive waste generation. As of this writing, the frequency of this usage has not been determined. We are continuing to review this matter.

C) Unit 2 Seal Water Discharge

As we discussed, NNECO has identified a use of small amounts of New London city water which may not have been previously discussed with DEP.

In this instance, Millstone Unit 2 uses a small amount of New London city water as pump seal water within its intake structure. The pump seal provides lubrication and prevents leakage of circulation water from the pump. Up to 16 gpm of city water is used as pump seal water in each of the four circulation pumps while up to 5 gpm are used in both of the screenwash pumps. This water is discharged into the intake bays, where it gets drawn into the circulation water flow (~569,000 gpm) and discharged through DSN 001B. All water discharged through (including the pump seal water) DSN 001B is monitored for Free Available Chlorine on a weekly basis and has a limit of 0.25 mg/l. Given the relative small amount of water utilized, please advise us whether the Department has any concerns or would like further information regarding this discharge.

As our review continues, NNECO will continue to provide the DEP with information on these or other compliance issues.

Should you have any questions or concerns regarding any of the above, please contact Mr. Paul Jacobson at (860) 665-3617.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Stephen E. Scace
Acting Director - Nuclear Engineering Programs

cc: Mr. Michael J. Harder
Mr. Robert Smith
Mr. Kevin McCarthy
NRC -- Document Control Desk

Attachment 1

Corrected DMR pages covering January 1993 through May 1996.