

Northeast
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July 9, 1997

SES-97-GN-106

D11256

Ms. Michelle DiNoia
Bureau of Water Management
Department of Environmental Protection
79 Elm Street
P.O. Box 5066
Hartford, CT 06106-5127

Millstone Station
NPDES Permit No. 0003263

Revisions to Discharge Monitoring Reports and Quarterly Aquatic Toxicity Monitoring Reports

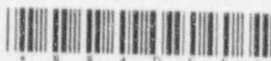
- References:
1. Quarterly Aquatic Toxicity Monitoring Report - April 1997
D11110 dated May 30, 1997 from S.E. Scace to Mr. James Grier
 2. Quarterly Aquatic Toxicity Monitoring Report - January 1997
D10791 dated Feb 20, 1997 from S.E. Scace to Mr. Robert Smith
 3. Quarterly Aquatic Toxicity Monitoring Report - October, 1996
D10488 dated Nov 26, 1996 from S.E. Scace to Mr. Robert Smith
 4. Quarterly Aquatic Toxicity Monitoring Report - July, 1996
D10179 dated Aug 30, 1996 from D.B. Miller to Mr. Robert Smith
 5. Quarterly Aquatic Toxicity Monitoring Report - April, 1996
D09881 dated May 24, 1996 from D.B. Miller to Mr. Robert Smith
 6. Quarterly Aquatic Toxicity Monitoring Report - Jan, 1996
D09603 dated Feb 21, 1996 from D.B. Miller to Mr. Robert Smith
- 11

Dear Ms. DiNoia:

As previously discussed with the Department both verbally and in writing, DSN 001A has not had condenser cooling water flow since November 1995. As discussed with the Department (Reference 1), in addition to the flow produced by the circulating water pumps, approximately 65% of Unit 1's service water system cooling water discharges via DSN 001A. The remaining service water discharges out DSN 001A-5. Based on an interpretation that NNECO's quarterly aquatic toxicity testing requirements were applicable only when flow was provided by the main condenser cooling water pumps, quarterly toxicity testing was not performed between January 1996 and April 1997.

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At a meeting with the Department on May 29, 1997, Northeast Nuclear Energy Company (NNECO) informed the Department that it had resumed toxicity testing in May 1997 upon determining that its NPDES permit was subject to different interpretations. At the May 29, 1997 meeting, it was agreed that NNECO would continue to perform quarterly toxicity testing at this discharge whenever there was any flow through DSN 001A.

On May 30, 1997 NNECO submitted its Quarterly Aquatic Toxicity Monitoring Report - April, 1997. At that time, NNECO advised the Department that it was undertaking a review of past aquatic toxicity submissions to determine whether revisions to the Quarterly Aquatic Toxicity Monitoring Reports and monthly Discharge Monitoring Reports (DMR's) were necessary. On or about June 9, 1997, NNECO notified the Department pursuant to Section 22a-430-3(j)(9)(C) of the Regulations of Connecticut State Agencies, as to the need to supplement and revise information previously provided in certain Quarterly Aquatic Toxicity Monitoring Reports, Discharge Monitoring Reports (DMRs) relative to Quarterly Toxicity Testing, Quarterly Heavy Metals Analysis and flow reporting at Discharge Serial No. (DSN) 001A.

Accordingly, enclosed, the following are corrected Discharge Monitoring Reports and supplemental information from December 1995 to April 1997.

1. Quarterly Aquatic Toxicity Monitoring Reports (January 1996, April 1996, July 1996, October 1996)

By this submittal, NNECO hereby supplements the above Quarterly Aquatic Toxicity Monitoring Report transmittal letters as follows:

NNECO's January 1996 Quarterly Aquatic Toxicity Monitoring Report transmittal letter stated that "Millstone Unit 1 (DSN001A) did not discharge for the month of January due to a refueling outage". The remaining transmittal letters (April, July and October 1996) stated that "Millstone Unit 1 (DSN001A) has not discharged this year due to an extended refueling outage. Millstone Units 2 and 3 (DSN001B and DSN 001C) are also shut down, but they maintain circulating water flow, and this circulating water flow has been tested". However, as discussed with the Department, this discharge does receive partial Service Water and/or Emergency Service Water flows (DSN 001A-5), as well as various batch discharges, (i.e. DSN's 001A-1, 001A-2 and 001A-4).

For these reports, NNECO provides clarification that Unit 1's circulating water pumps did not discharge during the quarter due to an extended refueling outage. As a result, based on the interpretation that testing was required when the circulating water pumps, which provides the primary source of flow, were in operation, DSN 001A was not tested.

2. Revisions to Discharge Monitoring Reports
 - a) Unit 1 Quarterly Toxicity Testing
DSN 001A

DMR's for January 1996, April 1996, July 1996, October 1996, January 1997 and April 1997 have been revised from "no discharge" to "not sampled". As stated above, since DSN 001A did not have circulating cooling water flow, which is the primary source of flow, no toxicity testing was performed based on the interpretation that sampling was not required when

circulating water pumps were not discharging during the quarter. A clarification is now noted on each DMR identified above.

Further, since testing for aquatic toxicity is a quarterly requirement, all other DMRs between December 1995 and March 1997 which state "no discharge" have been revised to indicate "not required - quarterly sampling only".

b) Unit 1 Circulating Water Flow
DSN 001A

For purposes of consistency, each DMR between December 1995 and May 1996 now indicates that the flow through DSN 001A during these months was comprised of partial Service Water flows (DSN 001A-5, as well as various batch discharges DSN's 001A-1, 001A-2 & 001A-4). While DMR's between June 1996 and April 1997 indicated that flows were from certain sources, DMR's between December 1995 and May 1996 did not.

c) Unit 1 Quarterly Heavy Metals Sampling
DSN 001A

DMRs for January 1996, April 1996, July 1996, October 1996, January 1997 and April 1997 have been revised from "no discharge" to "not sampled". As stated above, since DSN 001A did not have circulating cooling water flow, which is the primary source of flow, no heavy metals testing was performed based on the interpretation of the permit that sampling was not required when the circulating water pumps were not discharging during the quarter. A clarification is now noted on each DMR identified above.

Further, since there is only a quarterly sampling requirement for heavy metals, all other DMRs between December 1995 and March 1997 which state "no discharge" have been revised to indicate "not required - quarterly sampling only".

Should you have any questions regarding this matter, please contact Mr. Paul Jacobson at (860) 447-1791 extension 2335.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



S. Scace
Director - Nuclear Engineering Programs

cc: Mr. Lee Dunbar, DEP
Mr. James Grier, DEP
NRC
Unit 1 NRC Resident Inspectors