



PECO ENERGY

PECO Energy Company
PO Box 2300
Sanatoga, PA 19464-0920

July 26, 1994

Department of Environmental Resources
Attention: Complaint Coordinator
Lee Park
Suite 6000
555 North Lane
Conshohocken, PA 19428

Dear Sir:

On Wednesday, July 13, 1994, Limerick Generating Station experienced a spill of a substance considered by the Department to be reportable. A Spill Report is also enclosed as required.

If you have any questions, please contact me at (610) 327-1200 extension 3035. Thank you for your attention to this matter.

Very truly yours,

G. B. Rombold, III, Manager
Industrial Risk Management

ARA:emm

Enclosures

cc: NRC

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SPILL REPORT

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(1) Generator Information

Company Name: PECO Energy Company
Facility: Limerick Generating Station (LGS)
Mailing Address: P.O. Box 2300, Pottstown, PA 19464
Facility Address: Evergreen & Sanatoga Roads, Sanatoga, PA
EPA ID No.: PAD000797951

Incident Information

Date: July 13, 1994
Time: approximately 8:10 AM
Location: LGS south and adjacent to the Spraypond Pumphouse and North of the Cooling Towers

(2) The Circumstances Causing the Incident

The Betz Clam-trol CT-1 feed system located south of the Limerick Generating Station (LGS) spraypond pumphouse is used for chemical injection in a plant system. The injection pump was started at 0715h by an LGS Chemist. The Chemist left the area around 0725h. Samples were obtained from the plant systems being treated at 0900h, and the product was present at the expected concentration. Thus the leak could not have occurred before 0850h, given a ten (10) minute process time for the concentration of the product in the plant system to drop below the expected concentration. The release continued until 1010h, when LGS Operations noticed leakage from a break in the chemical pump discharge line, and isolated the injection system to terminate the release. LGS Industrial Risk Management (IRM) was notified by Operations at 1015h and responded to the spill by 1030h.

(3) Description of the Material Released

Based on pumping rates, approximately 18 gallons of Betz Clam-trol CT-1 was inadvertently released from the injection system located south of the LGS spraypond pumphouse. The product has a DER PQ of ten (10) gallons. The product contains 30% ethylene glycol, a CERCLA hazardous substance with an RQ of one (1) pound. Approximately 46 pounds of ethylene glycol was spilled onsite around the carboy.

Identification of the notification requirements was made around 1130h at which time it was determined that more than one (1) pound of ethylene glycol was released to the ground. The required notifications were then made by George Williams of LGS Operations. The National Response Center was notified by 1215h. The Pennsylvania Department of Environmental Resources was also notified by 1215h. The Nuclear Regulatory Commission was notified at 1315h.

SPILL REPORT

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(4) Legible Copy of the Manifest Document

This information is not applicable due to the product being released onsite from a carboy which is part of the feed system.

(5) Description of the Environmental Contamination

The spill was contained in an area of approximately 40 square feet and seeped approximately two (2) inches into the compacted soil. Red Danger flagging was placed around the spill area. An absorbent was spread over the spill area.

The visible spill soil was excavated by the end of the work day on Wednesday, July 13th. A plastic covering was placed over the spill area and the excavation completed by the afternoon of Friday, July 15th. The spill area was excavated to a depth of approximately 5 1/2 inches. The area was restored with sand placed in the excavated area. None of the substance was released from the site, the spill was contained in the area around the carboys and effectively removed. Six (6) drums of waste soil contaminated with the product were generated from the clean-up.

The six (6) waste drums are currently stored at the LGS Hazardous Waste 90-day Staging Area in the flammable bay. The drums will be disposed through an environmental contractor in accordance with federal and state regulations.

(6) Description of the Preventative Actions to be Taken

An analysis of the line break of the polyethylene piping in the Clam-trol system has identified the root cause of the break as prolonged pump vibration with possible degradation due to ultraviolet (UV) radiation. In order to prevent recurrence, the following immediate and long-term actions will be taken:

- 1) Immediately replacing the polyethylene piping in kind and restoring the system to normal;
- 2) By August, covering all exposed portions of the piping, thereby eliminating exposure to UV radiation;
- 3) By the end of the year, procuring and installing pulsation dampeners, thereby reducing the chance of a line break due to prolonged pump vibration; and
- 4) By the end of the year, replacing the polyethylene piping with polypropylene which has a higher resistance to degradation due to UV radiation.

For further information, please contact George Rombold, Manager - Industrial Risk Management, at (610) 327-1200, extension 3035.