NT-88-0407

Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291-0400
Telephone 205 250-1837

W. G. Hairston, III
Senior Vice President
Nuclear Operations

Alabama Power
the southern electric system

August 22, 1988

Docket Nos. 50-348
50-364

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Joseph M. Farley Nuclear Plant NPDES Permit

Gentlemen:

A copy of the attached correspondence is provided in accordance with the Joseph M. Farley Nuclear Plant Technical Specifications, Appendix B, Section 3.2. Should you have questions or comments, please advise.

Yours very truly,

W. G. Hairston

W. G. Hairston, III

WGH/JAM:emb

Attachment

cc: Mr. L. B. Long (w/attachment)
Dr. J. N. Grace (w/attachment)
Mr. E. A. Reeves (w/attachment)
Mr. G. F. Maxwell (w/attachment)

C001
1/1

Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 250-1000

Alabama Power
the southern electric system

August 15, 1988

Farley Nuclear Plant
NPDES Permit No. AL0024619

Mr. James M. Moore, III
Alabama Department of
Environmental Management
1751 Federal Drive
Montgomery, AL 36130

Dear Mr. Moore:

As discussed with Mr. Mike Godfrey of this office, we are forwarding information supporting two requests associated with the approved service water chlorination program for the above referenced facility.

Both requests involve discharges which occur from the cooling tower system (DSN005 - DSN008). The first request concerns the time of chlorine discharge associated with cooling tower blowdown. A continuous corrosion control program, approved by ADEM, has been utilized for several years for both units' cooling tower systems. The programs typically require a blowdown of one to three hours daily, however, a blowdown of five hours is necessary on occasion. Typically, blowdown is held until chlorine is less than detectable and only then is it released to the environment. When a unit is being treated for Corbicula control (continuous chlorination of the service water system) the blowdown, even if held as normally occurs, may continue to contain a small amount of chlorine resulting from the Corbicula control program, since chlorinated service water is used for cooling tower make-up. In 40 CFR 423.13[d][2] it states the NPDES permitting authority may approve additional time of chlorinated cooling tower blowdown discharge if the permittee demonstrates they cannot operate at the two hour level. As such, we are requesting the two hour time limit be waived based on the situation which occurs at the above referenced facility and the insignificent effect which such a change would have on the environment.

The second request concerns when monitoring should occur for the cooling tower blowdown. We are requesting the monitoring of cooling tower blowdown be performed in such a manner as to represent the overall "chlorination" which occurs when the Corbicula control program is being performed. The typical release of blowdown was described in the above paragraph. During the Corbicula control program the cooling tower system becomes a side stream to the service water system since the chlorine monitoring point is located at the

river discharge. Thus, even though "normal cooling tower chlorination" may not occur, the possibility exists for detectable amounts of chlorine to be present from the Corbicula control program (continuous chlorination of the service water system). This could be interpreted to require us to sample blowdown every thirty minutes due to the addition of chlorinated water from the service water system. Further, this implies that if the chlorinated service water systems effluent goes directly to the river, one set of monitoring conditions exist, but if a portion of this water is diverted through the cooling tower system monitoring must be performed every thirty minutes. Should chlorinated service water pass through the cooling tower system, the total amount of chlorinated water would not be affected since the 0.2 ppm limit at the river is the controlling factor. As a matter of fact, while moving through the cooling tower system there is a possibility the actual concentration of chlorine could decrease, but in no case would either the concentration or total amount of chlorine increase at the river discharge point.

We therefore request chlorine monitoring of the cooling tower blowdown be waived during periods when the service water system is being chlorinated for Corbicula control and that this waiver be incorporated as a part of the requirements for the Corbicula control program. We understand should chlorine be introduced into the cooling tower system, except as a result of the service water chlorination program, this waiver would not be applicable. We feel this request is justified, based on the fact that the total amount of chlorine released to the environment will not increase and that the requested changes in chlorine monitoring will continue to provide protection for the environment.

Should you have any questions, please contact Mr. Godfrey at 250-4194.

Sincerely,

John D. Grogan

John D. Grogan, Manager
Environmental Compliance

JMG:dy