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February 9, 1998

Mr. David P. Pollison
Branch Head, Planning Branch
Delaware River Basin Commission
P.O. Box 7360
West Trenton, NJ 08628-0360

Dear Mr. Pollison:

Subject: Limerick Generating Station NPDES Permit No. PA0051926
Discharge Limit for Total Suspended Solids

This letter is being sent to document our meeting held at DRBC offices on Wednesday, February 4, 1998. The purpose of the meeting was to discuss the regulatory requirements for monitoring total suspended solids (TSS) as contained in the facilities NPDES permit. As a result of our discussions, the following points were agreed upon by both PECO Energy Company and DRBC:

1. A review of the previous NPDES permitting process clearly indicated that PaDEP placed the monitoring requirement in the permit based on DRBC Water Quality Regulations (Article 3, Section 3.10.4, Effluent Quality Requirements).
2. The previous NPDES permit did not contain a TSS monitoring requirement for outfall 001. In addition, DRBC did not instruct or request PaDEP to place a TSS monitoring requirement in the current permit.
2. The Steam Electric Power Generating Effluent Guidelines (40 CFR 423) do not place a TSS limit on cooling tower blowdown (§423.12(b)(7) and/or §423.13(d)(1)).
3. The TSS limits contained in Article 3, Section 3.10.4.D.1.a of DRBC's Water Quality Regulations pertain to wastewater treatment facilities. Cooling towers are designed to remove heat from the circulating water system and are not a "traditional" wastewater treatment facility as intended in the subject regulations (ie., solids removal). Therefore, the TSS limits of this section are not applicable to cooling tower blowdown.
4. A review of Limerick's DRBC Docket, D-69-210 CP (Final), verified that there is no TSS requirement for cooling tower blowdown.

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5. A review of other facility NPDES permits with cooling tower blowdown indicated that no other cooling tower blowdown discharges (with the same configuration as Limerick) were required to monitor for TSS. Also, it was determined that the main circulating water discharges from all other PECO Energy generating stations are not required to monitor for TSS.
6. The potential sources of TSS in outfall 001 effluent are: the holding pond, the sanitary plant (if operated) and the radwaste laundry drain system. Each of these sources has a TSS limit applicable prior to mixing with cooling tower blowdown (internal monitoring points).
7. Our methodology for monitoring and calculating net TSS levels has been amended to better reflect plant operations. However, while improvements have been made, data shows that due to rainfall and sudden changes in river TSS levels, the site is subject to permit violations over which we have no control.

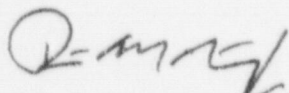
Based on this information, DRBC concurred with our position that the TSS limit for outfall 001 should be removed from the permit. The TSS limits on the internal monitoring points, as noted above, will remain in effect as contained in the current NPDES permit.

We are requesting the DRBC to notify PaDEP that, based on the above information, the TSS limit placed on outfall 001 is not applicable and should be removed from the permit.

A copy of this letter (including any attachments or enclosures) is being sent to the U.S. Nuclear Regulatory Commission (USNRC) in accordance with the Limerick Generating Station, Units 1 and 2, Environmental Protection Plan, Section 3.2. The plan stipulates that the USNRC shall receive a copy of any proposed changes to the NPDES permit at the same time that the permitting agency is notified.

We appreciate your time and effort in helping us resolve this issue. If you have any questions or require additional information, please contact me at (215) 841-5177.

Sincerely,



Robert M. Matty, Jr.
Engineer
Environmental Affairs

cc: U.S. Nuclear Regulatory Commission, Document Control Desk
(Docket Nos. 50-352 and 50-353 & License Nos. NPF-39 and NPF-85)
H. J. Miller, Administrator, USNRC, Region 1
USNRC Senior Resident Inspector, LGS

Mr. James Newbold
Pennsylvania Department of Environmental Protection

Mr. Ronald Rulon
Delaware River Basin Commission