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Perry Nuclear Power Plant 10 Center Road Perry, Ohio 44081 Mail Address. P.O. Box 97 Perry, OH 44081

216-280-5915 FAX: 216-280-8029 Lew W. Myers Vice President

August 13, 1997 PY-CEI/OEPA-0274L

Attention: Marie Underwood Ohio Environmental Protection Agency Northeast District Office 2110 Aurora Road Twinsburg, Ohio 44087

Perry Nuclear Power Plant NPDES permit No. 3IB00016*ED Cured In Place Piping Replacement

Ladies and Gentlemen:

The Perry Nuclear Power Plant has scheduled essential maintenance of the Service Water System, which will occur during September and October of 1997. This maintenance activity will insert a vinyl ester lining, impregnated with a styrene resin, into the Service Water System piping. This lining will cure inside the existing pipe. This activity is termed a Cured In Place Piping project. As part of the insertion and curing process, water will be pumped through the liners in a closed loop system. Once the cure procedure has progressed sufficiently, the cure water will be transferred to the Chemical Cleaning Lagoon, discharge point 3IB00016602, where it will remain until sometime after the Service Water System is restored to an operating status. The total amount of cure water will be approximately 250,000 gallons.

A controlled test of this application was conducted to determine the approximate amount of styrene present within the cure water. The analysis results indicated that the cure water contained approximately 2000 parts per billion (ppb) of styrene after cooling and less than 1000 ppb of styrene after a 24 hour aeration period. These levels are expected to decrease to approximately 50 ppb while the cure water remains in the Chemical Cleaning Lagoon.

The process may also utilize vegetable oil as a lubricant for some of the liner insertions. The concentration of oil and grease within the cure water will be maintained within the limits specified by NPDES Permit 3IB00016*ED, (30 day average 15 ppm, daily average 20 ppm).

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The Perry Nuclear Power Plant is requesting permission to discharge the above mentioned cure water, from the Chemical Cleaning Lagoon (3IB00016602), through the Discharge Tunnel Entrance Structure (3IB00016004), under the following conditions:

- The Service Water System will be in service providing dilution flow.
- The Chemical Cleaning Lagoon will be sampled and analyzed, per EPA Method 8260 with a detection limit of approximately 5 ppb, to determine styrene levels prior to discharge.
- The Chemical Cleaning Lagoon will be discharged through the Service Water System at a
 discharge rate that will ensure the Discharge Tunnel Entrance Structure (3IB00016004)
 styrene concentration is less than the detectable limit of EPA Method 8260, approximately
 5 ppb.
- The Discharge Tunnel Entrance Structure, (3IB00016004), will be sampled and analyzed per EPA Method 8260 to document discharge styrene concentrations (concentrations to be less than detectable, approximately 5 ppb).
- The Discharge Tunnel Entrance Structure, (3IB00016004), will be sampled and analyzed per approved EPA Method to document discharge oil and grease concentrations (concentrations to be within limits of NPDES Permit 3IB00016*ED).
- All discharge documentation will be maintained and results included with the applicable NPDES Monthly Report as requested.

If you have any questions or require additional information, please contact James T. Ratchen at (216) 280-5601.

Very truly yours,

Lew W Myers

JTR:jem

cc: NRC Document Control Desk (Docket Number 50-440)

NRC Project Manager

NRC Resident Inspectors Office

NRC Region III