PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION P. O. BOX A SANATOGA, PENNSYLVANIA 19464

July 19, 1989

Mr. Robert Bauer, Jr. Department of Environmental Resources Bureau of Water Quality Management 1875 New Hope Street Norristown, PA 19401

Subject: Unpermitted Discharge to Outfall 009, Limerick Generating Station, NPDES Permit No. PA-0051926

Dear Mr. Bauer:

On July 14, 1989 at approximately 3:00 p.m. oral notification of a non-compliance with the provisions of our NPDES permit was given to Mr. Norm Leyland. Upon completion of our preliminary investigations an hour later, the details of the non-compliance were presented to Mr. David Burke.

At 1100 that same day, water was observed to be flowing from the spray pond blowdown manhole. Routine surveillance of the manhole was in place due to past overflow problems. A subsequent inspection of outfall 009, which ultimately would collect this overflow, revealed water flowing at approximately 25 gallons per minute. Upon checking the spray pond, it was discovered that the level had risen three inches since the previous afternoon. A barrier was in use that would allow controlled pond discharge at a rate that the normal drain line could handle, yet still prevent level increases that would overflow the shoreline. The three inch increase brought the level above that of the barrier. While this prevented overflowing pond edges, it produced greater flow than the normal drain line was designed for. This resulted in overflow from an associated manhole, and ultimate discharge through outfall 009.

The discharge from outfall 009 was stopped at approximately 1145 by repositioning the barrier to account for the level change. The level of the pond was then lowered by pumping the water to the Unit 1 cooling tower.

Subsequent investigations revealed that one of several intertie valves between our Emergency Service Water (ESW) system, which operates from the Spray Pond, and our normal service water system, which operates from a cooling tower, was left open. This allowed water to flow into the spray pond at approximately 700 gallons per minute. The ESW system was in operation for approximately three hours before the discharge was terminated. We determined based on the visual observations at 009, the estimated total discharge was 5000 gallons. However, as mentioned to Mr. Burke, there is approximately 100 yards of land between the outfall and the river. Therefore, it is very unlikely that any of this water actually entered the river. The discharged water was of pH 8.5 and of discharge quality for the normal outfall 001.

Although this is a recurrence of a similar event in April 1989, the corrective actions taken at that time, and the heightened awareness of the situation, substantially decreased the extent of the discharge. This recurrence appears to be due in part to a procedural deficiency. A meeting is planned to discuss this event and to develop corrective actions to prevent recurrence. We will inform you of these actions by September 1, 1989.

Sincerely, R.W.Duli

M. J. McCormick, Jr. Plant Manager

SCD:sjm scd 7/14/89.1

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

> Administrator Region I Office of Inspections and Enforcement U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

Station Resident NRC Inspector Tom Kenny, M.C. #NRC Program Management Section (3WM52) Permits Enforcement Branch Water Management Division Environmental Protection Agency Water Permits Section Region III 841 Chestnut Building Philadelphia, PA 19107

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