

Niagara Mohawk

Richard B. Abbott
Vice President
Nuclear Engineering

January 14, 2000
NMP1L 1496

Phone: 315.349.1812
Fax: 315.349.4417

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE:	Nine Mile Point Unit 1 Docket No. 50-220 <u>DPR-63</u>	Nine Mile Point Unit 2 Docket No. 50-410 <u>NPF-69</u>
-----	--	--

Subject: *Report on the Status of the New York State Pollutant Discharge Elimination System*

Gentlemen:

This report is being submitted in accordance with a letter dated April 15, 1983, which requires Nine Mile Point Nuclear Station to report State Pollutant Discharge Elimination System (SPDES) Permit violations. The site's permit is applicable to both Nine Mile Point Nuclear Station Unit 1 and Unit 2.

On January 6, 2000, a Utility Mechanic was observed disposing of mop water down a floor drain in the Unit 1 Administration Building, which discharges to the Storm Drainage System, Outfall 001. This constitutes an unpermitted discharge per the facility's SPDES permit. The event was verbally reported to the New York State Department of Environmental Conservation Region 7 Water Engineer on January 7, 2000 and reported to the New York State Department of Environmental Conservation in a 5-day non-compliance report January 14, 2000 (Attachment).

Should you have any questions concerning this matter, please contact Janet Marsden at (315) 349-4200.

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/KES/cer
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Gamberoni, Acting Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR
Records Management



January 14, 2000
NMPE 0190

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

**RE: Nine Mile Point Nuclear Station
State Pollutant Discharge Elimination System
Discharge Permit Number NY 000-1015
Outfall 007, Equipment and Floor Drains**

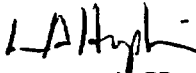
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding an unpermitted discharge of mop water to storm drainage, Outfall 001, that Mr. Kent E. Stoffle discussed with you on January 7, 2000. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the State Pollutant Discharge Elimination System Permit General Conditions.

This report will also be included with the January 2000 Discharge Monitoring Report.

Should you have any questions concerning this matter, please contact Janet Marsden at (315) 349-4200.

Very truly yours,


Lawrence A. Hopkins
Plant Manager - NMP1

LAH/KES/cer
Enclosure

SECTION 1

New York State Department of Environmental Conservation
Division of Water

Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: Nine Mile Point Nuclear Station

Date of noncompliance: 1 / 06 / 00 Location (Outfall, Treatment Unit, or Pump Station): 001/007

Description of noncompliance(s) and cause(s): A Supervisor conducting a field observation on January 6, 2000, observed Utility Mechanics disposing of mop water down a floor drain (Outfall 007) in the Unit 1 Administration Building, which discharges to the storm water drainage system, Outfall 001. The mop water contained a small amount (1 tsp of detergent per 5 gallons of water) of Gabriel Biodegradable Cold Water Detergent (MSDS attached). Due to recent environmental training, the Supervisor questioned the practice. Further investigation revealed that this has been common since 1996.

The apparent cause of the noncompliance was found to be that managerial methods used to control work activities were not correctly understood and implemented. The Supervisor and the Utility Mechanics failed to identify that their activity could lead to an unpermitted discharge to the environment. It has been a long standing rule at Nine Mile Point that only clean water may enter any floor drainage system. Initial and continuing employee training addresses the proper use of floor and equipment drains at NMP.

Has event ceased? (Yes) If so, when? 01/06/00 Was event due to plant upset? (No) SPDES limits violated? (No)

Start date, time of event: 1 / 6 / 00, 9:00 (AM) End date, time of event: 1/6/00, 09:00 (AM)

Date, time oral notification made to DEC? 1 / 7 / 00, 9:00 (AM) DEC Official contacted: Mr. William McCarthy

Immediate corrective actions: The Supervisor overseeing the work activity immediately stopped the employee that was putting mop water down the floor drain.

Preventive (long-term) corrective actions: Human performance accountability was addressed through the Human Resource Department. To ensure that all employees are aware of the policies for using floor drains at NMP, this SPDES violation and management expectations will be reviewed with each department. A Deviation Event Report (a corrective action report used at NMP) has been initiated and further preventive/corrective actions may be generated following root cause analysis.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Kent E. Stoffle Title: Environmental Analyst Date: 01 / 07 / 00
Phone #: (315) 349-1364 Fax #: (315) 349-1400

FAST DETERGENT

91-141-058

U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
MATERIAL SAFETY DATA SHEET
Required under OSHA Safety and Health Regulations
(29 CFR 1910.1200 "Hazardous Communication Standard")

SECTION I

Manufactured for: GABRIEL SERVICE & SUPPLY CORP
Emergency Telephone: 716/361-7000
Address: 233 N Commercial Street
City/State/Zip: East Rochester, N.Y. 14445
Chemical Name & Synonyms: AQUEOUS SOLUTION
Trade Name & Synonyms: FAST DETERGENT
Chemical Family: ALKALI CLEANER
Formula: N/A
Prepared by Manufacturer Representative:
Prepared on: 01/94
Proper Shipping Name:
CORROSIVE MATERIAL

SECTION II - PRODUCT & COMPONENT DATA

HAZARDOUS COMPONENTS

Chemical Names	CAS	PEL	TLV
----------------	-----	-----	-----

THIS COMPOUND OR ANY OF ITS INGREDIENTS ARE NOT LISTED BY OSHA, NTP, OR IARC AS A CARCINOGEN OR POTENTIAL CARCINOGEN NOR DO THEY HAVE ESTABLISHED OSHA PEL'S OR ACGIH TLV'S

WATER	7732-18-5		
PENTASODIUM TRIPHOSPHATE	7758-29-4		
BUTOXYETHANOL	111-76-2		
DODECYLBENZENSULFONIC ACID	27176-87-0		
NONOXYNOL-9	27176-87-0		
SODIUM META SILICATE	6834-92-0		
SODIUM DODECYL DIPHENYLOXIDE DISULFONATE	25167-32		
SODIUM NAPHALENE SULFONATE	1321-69-3		
FRAGRANCE	N/A		

The Concentrated pH is approximately 12

SECTION III - PHYSICAL DATA

Boiling Point: 214F 100C
Specific Gravity (W20=1): 1.09
Vapor Pressure: UNKNOWN
Percent, Volatile by Volume(t): 85t
Vapor Density(Air=1): 31
Evaporation Rate: WATER
Solubility in Water: COMPLETE
Appearance and Odor: CLEAR LIQUID, LEMON SCENT

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flash Point/Method Used: WILL NOT SUPPORT COMBUSTION
Flammable Limits: NA
Extinguishing Media: ANY - WILL NOT SUPPORT COMBUSTION
Special Fire Fighting Procedures:
NONE, WILL NOT SUPPORT COMBUSTION.
UNUSUAL FIRE AND EXPLOSION HAZARDS
NONE

SECTION V - HEALTH HAZARD DATA

Effects of Overexposure:
THIS PRODUCT COULD AGGRAVATE THE SKIN OF PERSONS WITH RASHES, CUTS, SCRAPES, DEEP WOUNDS OR SENSITIVE SKIN
Medical Conditions Aggravated by Exposure:
NO MEDICAL CONDITION
Emergency First Aid Procedures:
FLUSH SKIN WITH SOAP AND WATER
FLUSH EYES WITH AN EYE NEUTRALIZER AND WITH WATER FOR AT LEAST 15 MINUTES
CONSULT A PHYSICIAN
IF INGESTED: DILUTE WITH A LARGE VOLUME OF MILK OR WATER AND CONSULT A PHYSICIAN
CONTAINS SOME PHOSPHATES AND BUTYL CELLOSOLVE

SECTION VI - REACTIVITY DATA

Stability: STABLE
Conditions to Avoid: NONE KNOWN
Incompatibility - Materials to Avoid: NONE KNOWN
Hazardous Decomposition Products: NONE KNOWN
Hazardous Polymerization - WILL NOT OCCUR
Conditions to Avoid: N/A
Hazardous Polymerization - WILL NOT OCCUR
Conditions to Avoid: NONE KNOWN

SECTION VII - SPILL OR LEAK PROCEDURES

Steps to be taken in case material is released or spilled:
DAM AREA OFF AND REMOVE TO LEAKPROOF CONTAINERS
NORMAL USE AMOUNTS MAY BE FLUSHED DOWN A SANITARY SEWER
Waste Disposal Method:
LANDFILL OR INCINERATE WITHIN ALL LOCAL, STATE, AND FEDERAL LAWS.
Waste Disposal Method:
LANDFILL OR INCINERATE WITHIN ALL LOCAL, STATE AND FEDERAL REGULATIONS

SECTION VIII - SPECIAL PROTECTION INFORMATION

Respiratory Protection(Type): NOT REQUIRED
NORMAL VENTILATION
Ventilation: NORMAL FLOW
Protective Gloves: RECOMMENDED
Eye Protection: RECOMMENDED
Other Protective Equipment: NONE

SECTION IX - SPECIAL PRECAUTIONS

Precautions to be taken in Handling and Storage:
NORMAL SAFE HANDLING PROCEDURES.
Other Precautions:
NONE KNOWN
Other Comments:

THIS INFORMATION IS GIVEN IN GOOD FAITH, BUT NO WARRANTY EXPRESSED OR IMPLIED IS MADE. OUR COMPANY BELIEVES THAT IT IS ACCURATE TO THE BEST OF ITS KNOWLEDGE AND RELATES ONLY TO THE SPECIFIC MATERIAL DESIGNATED HEREIN.