



**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72

January 27, 2000
3F0100-13

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Report Required by Environmental Protection Plan

Dear Sir:

The Crystal River Unit 3 (CR-3) Environmental Protection Plan (EPP), Appendix B of the CR-3 Operating License establishes reporting requirements related to the National Pollutant Discharge Elimination System (NPDES) Permit. Section 3.2.4 of the EPP requires that the NRC be provided with copies of proposed changes to the NPDES permit.

Florida Power Corporation has requested a minor permit revision of the NPDES permit regarding reporting requirements for oil and grease concentrations at internal plant outfalls. The attached letter to the State of Florida Department of Environmental Protection provides the information on the requested changes.

There are no new regulatory commitments made in this submittal. If you have any questions regarding this submittal, please contact Mr. Sid Powell, Manager, Nuclear Licensing at (352) 563-4883.

Sincerely,

 FOR SLB

S. L. Bernhoft
Director, Nuclear Regulatory Affairs

SLB/smg

Attachment

xc: Regional Administrator, Region II
Senior Resident Inspector
NRR Project Manager

COO1

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT TO LETTER 3F0100-13

State of Florida approval is requested to change NPDES Permit FL0000159 to modify reporting requirements for oil and grease concentrations at internal plant outfalls.



January 27, 2000

Ms. Wanda Parker-Garvin
Industrial Wastewater Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Power Corporation Crystal River Unit Three
NPDES Permit Number FL0000159
Minor Permit Revision

Dear Ms. Parker-Garvin:

As discussed with you by telephone, Florida Power Corporation (FPC) is requesting a minor permit revision to require that the monitoring results for oil and grease samples from internal plant outfalls, I-FE and I-FG, be report only values. FPC samples these internal outfalls prior to release in order to ensure that compliance with state water quality standards will be achieved at the D-OF point of discharge. When the internal sample results are lower than the internal outfall values, the sampling at D-OF becomes unnecessary to demonstrate compliance with state water quality standards. When the internal sample results are higher than the internal outfall values, then compliance monitoring at D-OF is required. However, as currently written, the permit implies the internal values are limits, which may cause the facility to appear in violation, even though compliance with water quality standards is achieved at outfall D-OF as demonstrated by the D-OF compliance monitoring.

FPC requests the Department issue a minor permit revision restating the internal outfall oil and grease values be report only values in the tables located at I.A.2.a (page 4 of 35), I.A.4.a (page 6 of 35) and I.A.6.a (page 10 of 35). A footnote should then be added at the bottom of each of these pages stating that if the concentrations of oil and grease at the internal outfalls exceed 20 mg/L, then compliance monitoring for oil and grease at outfall D-OF is required to demonstrate that the 5 mg/L state water quality standards are being met.

Your consideration of these requests is greatly appreciated. Please contact me at (727) 826-4283 if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent D. Hedrick", is written over a printed name and title.

Kent D. Hedrick / PE
Manager, Environmental Programs