



February 29, 2000
NMP2L 1927

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

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Subject: Transmittal of 1999 Annual Environmental Operating Report

Gentlemen:

In accordance with Appendix B of the Operating License (Environmental Protection Plan) for Nine Mile Point Nuclear Station (NMPNS) Unit 2, enclosed is the Annual Environmental Operating Report for the period January 1, 1999 through December 31, 1999.

In the event you have any questions concerning the report, please contact Janet Marsden, Supervisor Environmental Protection at Nine Mile Point (315) 349-4200.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Peckham".

Michael F. Peckham
Plant Manager - NMP2

MFP/KES/kap
Enclosure

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

NIAGARA MOHAWK POWER CORPORATION

ANNUAL ENVIRONMENTAL OPERATING REPORT

January 1, 1999 - December 31, 1999

for

NINE MILE POINT NUCLEAR STATION UNIT 2

Facility Operating License NPF-69
Docket Number 50-410

ANNUAL ENVIRONMENTAL OPERATING REPORT

Section 5.4.1 of the Environmental Protection Plan (EPP), as contained in Appendix B of the Operating License for the Nine Mile Point Nuclear Station Unit 2, requires that an Annual Environmental Operating Report be submitted to the Commission prior to May 1 of each year. The following addresses the requirements found in Section 5.4.1 of the Environmental Protection Plan (EPP) for the submittal of the Annual Environmental Operating Report:

1. Provide summaries and analyses of the results of the environmental protection activities required by Section 4.2 (if any) of the EPP, including a comparison with related preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports; and an assessment of the observed impacts of plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, a detailed analysis of the data and a proposed course of mitigating action shall be provided.

Section 4.2 of the EPP denotes three areas of monitoring:

- Section 4.2.1 (Aquatic Monitoring) has no specific monitoring requirements although it is noted that the Commission will rely on the decisions made by the State of New York under the authority of the Clean Water Act for any requirements. Aquatic monitoring is specified in the station's State Pollutant Discharge Elimination System Permit (SPDES Permit) which is a site permit applicable to Nine Mile Point Nuclear Station Unit 1 and Unit 2. The SPDES Permit requires a limited Aquatic Monitoring Program (referred to in the permit as a Biological Monitoring Program) which, at the present time, is only applicable to Unit 1. Therefore, no Aquatic Monitoring Program is presently required for Unit 2.
- Section 4.2.2 (Terrestrial Monitoring) and Section 4.2.3 (Noise Monitoring) of the EPP also do not contain any monitoring requirements.

2. Provide a list of EPP noncompliances and corrective actions.

A review of the EPP requirements showed that there were no conditions of noncompliance with these requirements during 1999.

3. Provide a list of all changes in station design or operation, or of any tests or experiments which involve a potentially significant unreviewed environmental question (non-radiological).

A review of plant records showed that there were two changes in station design/operation that involved a potentially significant unreviewed environmental question (non-radiological). An environmental evaluation was performed and the changes did not create an unreviewed environmental question. A brief description of the changes are included below:

Change No. 1: Discharge of Demineralizer Purge Water (Wastewater) after Initial Purge of Demineralizer System (Ecolochem Trailer).

The Final Environmental Statement - Operating License Stage (FES-OL) related to the operation of Nine Mile Point Nuclear Station, Unit No. 2 (Docket No. 50-410) evaluated the discharge of demineralizer wastewater to Lake Ontario. The FES-OL Section 5, Environmental Impacts of Station Operation, compares the chemical discharge composition of plant effluents. The discharge of wastewater from the demineralizer system was evaluated in FES-OL Section 5.1.2, Chemical. However, the FES states the wastewater will be neutralized prior to discharge. This requirement was based on the use of sodium hydroxide and sulfuric acid during the regeneration of the demineralizer resins. Currently, the facility does not regenerate resins on-site; thus the requirement to neutralize the wastewater prior to discharge is not applicable. The New York State Department of Environmental Conservation State Pollutant Discharge Elimination System (SPDES) Permit was modified on September 27, 1996 to include discharge of demineralizer water via Outfall 040, Unit 2 Service Water Discharge.

In conclusion, as previously evaluated in the FES-OL, the discharge of demineralizer wastewater poses no significant environmental threat to aquatic biota or the water quality of Lake Ontario. The discharge of demineralizer wastewater would conform to all criteria and standards of the State of New York, Environmental Protection Agency, and the International Agreement on Great Lakes Water Quality between the United States of America and Canada (1972). This change does not involve an unreviewed environmental question or constitute a decrease in the effectiveness to meet the objectives specified in Section 1.0 of the EPP.

Change No. 2: Hydrogen and Oxygen Gas Supply Facility and Supply Line Functional Test.

The hydrogen and oxygen gas supply facility and supply line functional test was not specifically evaluated in the FES-OL. The air quality evaluations in the FES-OL specifically addressed ozone, oxides of sulfur and nitrogen, total suspended particulates, cooling tower fog generation, and products of combustion of on-site diesel generators. These were considered to be the only pollutants with potential to have adverse environmental impacts, even considering that hydrogen would be used on-site for generator operation. During the operation of the gas facility and associated supply line tests, a minor discharge of hydrogen and oxygen will occur into the atmosphere.

The discharge is considered to be environmentally insignificant. Hydrogen and oxygen are not regulated pollutants under the Federal Clean Air Act, the New York State (NYS) Air Resource Program, NYS hazardous substance regulations, the federal hazardous substance regulations or federal accidental release program. Specifically, hydrogen and oxygen have been evaluated under the NYS Air Resources program and such releases have been determined to be trivial activities not subject to permitting (6 NYCRR Part 201-3.3(c)(94)).

In conclusion, the release of hydrogen and oxygen during the operation of the gas supply facility poses no significant environmental threat. The discharge of hydrogen and oxygen conforms to all criteria and standards of the State of New York Department of Environmental Conservation and the Federal Environmental Protection Agency. This change does not involve an unreviewed environmental question or constitute a decrease in the effectiveness to meet the objectives specified in Section 1.0 of the EPP.

4. List all non-routine reports that were submitted during 1999 in accordance with Section 5.4.2 of the EPP.

During 1999, there were no non-routine reports submitted to the Commission in accordance with Section 5.4.2 of the EPP.