

Exelon Nuclear
Limerick Generating Station
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NPDES PA 00051926

August 24, 2007

Mr. Sohan Garg
Chief, Permits Section
Water Management Program
Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

Subject: Outfall 020 – Perkiomen Storage Tank Discharge

Reference: LGS Industrial Waste NPDES Permit PA00051926

Dear Mr. Garg:

The Perkiomen Storage Tank at Limerick Generating Station, fed from the East Branch of Perkiomen Creek, contains river water used for cooling tower makeup. This tank is drained occasionally to support inspections and equipment repair, typically at a twenty-four month average frequency. On 5/26/07, it was drained to perform a preventative maintenance inspection and cleanout, with most of the inventory being gravity fed to the cooling tower basin. Approximately 66,000 gallons of the 1.2 million gallon inventory was discharged to Outfall 020, which has a daily maximum effluent limit of 100 mg/L for Total Suspended Solids. This parameter was a monitor/report value under the previous Permit, with the limit established as part of the LGS NPDES Permit renewal in April 2006.

Sampling of Outfall 020, located 200 yards downhill from the storage tank, is not safely accessible due to the terrain at the tank discharge pipe. Because of personnel safety considerations, the sample is obtained in an area below the pipe, at the Possum Hollow Creek. Water exiting the pipe flows over a rocky area enroute to this location, resulting in the likelihood of introducing non-representative solids into the sample stream. During the draining activity on 5/26/07, four samples were obtained, with TSS analyses results averaging 121 mg/L.

From an equipment configuration perspective, the discharge line is hard piped from the tank to the outfall location, with no sample taps available at ground level. It does not afford a safe or practical means of adding a sample point.

In light of the aforementioned evolution frequency and sampling constraints, this correspondence is to request a reevaluation of the requirement for the Outfall 020 Total Suspended Solids limit, or consideration relative to an increase in the TSS daily maximum limit.

This letter contains no commitments

Thank you for your cooperation in this matter. Should you have any questions regarding this information, please contact Bob Alejnikov at 610-718-2513.

COO/
LKR

Sincerely;

A handwritten signature in black ink, appearing to read "Edward W. Callan". The signature is fluid and cursive, with a large initial "E" and "C".

Edward W. Callan
Plant Manager
Limerick Generating Station
Exelon Generation Company, LLC

cc: S. Collins, Region 1 Administrator, USNRC
S. Hansell, Resident Inspector, USNRC
Document Control Desk, USNRC, Wash. DC

bcc: E. Callan – GML 5-1
C. Mudrick – GML 5-1
T. Basso – SSB 2-1
S. Mitten – SSB 2-1
R. Alejnikov – SSB 2-1
T. Siglan – KSA 3N
R. Kreider – SSB 2-4