

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

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J. DOERING, JR.
PLANT MANAGER
LIMERICK GENERATING STATION

March 16, 1993

Mr. Joseph A. Feola
Pennsylvania Department of Environmental Resources
Regional Water Quality Manager
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

Subject: Limerick Generating Station, Units 1 and 2
Noncompliance with NPDES Permit No. PA-0051926

Dear Mr. Feola:

DESCRIPTION OF NONCOMPLIANCE

On February 22, 1993, at 1515 hours, it was identified that contractor personnel were discharging treated water from a fire hydrant supplied by the Unit 1 Cooling Tower into storm water drain E-3.2. Drain E-3.2 is part of the storm water collection network for Outfall number 005 which discharges directly into Possum Hollow Creek and is specified by the NPDES permit to be utilized only for storm water runoff.

The contractor personnel were hydrolazing the Unit 2 condenser and had placed two one inch diameter bypass hoses into storm drain E-3.2. The discharge from the hoses into storm drain E-3.2 occurred intermittently during hydrolazing when the hydro wands inside the condenser were not in use so that water was bypassed through the hoses into storm drain E-3.2. Hydrolazing of the Unit 2 condenser with bypass flow discharged into storm drain E-3.2 occurred from 1900 hours on February 19, 1993 through 0200 hours on February 20, 1993, from 0700 hours on February 20, 1993 through 0200 hours on February 21, 1993, and from 0700 hours February 22, 1993 until discovery at 1515 hours on February 22, 1993. Upon discovery, the bypass hoses were routed to the normal waste drain system to terminate the unmonitored release. An estimated 40,000 gallons of treated Unit 1 Cooling Tower water was discharged into storm drain E-3.2 during the period. An analysis of a sample taken from the effluent from Outfall number

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005 during the discharge determined the pH to be 7.52, the total zinc concentration to be 0.18 ppm, and the total suspended solids to be 2.4 mg/L; all values well within NPDES permit limits for discharges to the Schuylkill River. No adverse environmental effects to Possum Hollow Creek were observed.

CAUSE OF THE NONCOMPLIANCE

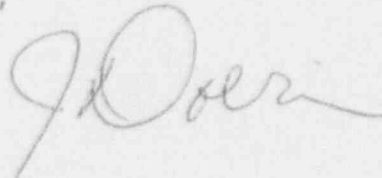
The cause of the noncompliance was a personnel error. The contractor involved in the event had received General Employee Training which informs workers of the types of fluids authorized for discharge into color coded drains at Limerick. A contributing causal factor to this event was that the description in the work order was inadequate because the job planner did not understand that hydrolazing equipment operation involves bypass flow. Other contributing causal factors were that actions to label all storm water drains to indicate their use for storm water runoff only are incomplete and that the scope and purpose of Administrative Guideline (AG) AG-100, "Guideline for Completion of the Site Dewatering Permit," do not clearly cover the circumstances of this event.

PREVENTION OF FUTURE OCCURRENCES

General Employee Training will emphasize that the storm water drains which are color coded BLUE are designed for discharge of storm water only and that the provisions of AG-100 must be followed prior to discharge of any other water into storm water drains. The scope and purpose of AG-100 will be clarified. The lessons learned from the investigation into this event will be communicated to job planners to prevent recurrence during future hydrolazing activities. A label will be applied to all storm water drains to indicate their use for storm water runoff only.

If you have any questions please contact Mr. Gil J. Madsen at (215) 327-1200.

Sincerely,



JLP:cah

cc: U.S. Nuclear Regulatory Commission
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