

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

September 24, 1990

Mr. Peter G. Noll
Department of Health
County of Bucks
Neshaminy Manor Center
Doylestown, PA 18901

SUBJECT: Noncompliance with NPDES Permit
Bradshaw Reservoir
NPDES Permit No. PA-0052221

Dear Mr. Noll:

DESCRIPTION OF NONCOMPLIANCE

During the period between August 6 and August 10, 1990 five consecutive daily samples were collected from Discharge 001 to the East Branch Perkiomen Creek by RMC Environmental Services. The samples were analyzed for fecal coliform and the geometric mean for the five day period was 211. This result exceeded our permit limit of 200 colonies/100 mls.

CAUSE OF THE NONCOMPLIANCE

The result of the fecal coliform sample collected on August 8, 1990 at Discharge 001 was 1070 colonies/100 mls. This result was considerably higher than the remaining four of the five consecutive day period because the Bradshaw Reservoir fecal coliform level was the highest during this same day and the ozone concentration in the Water Processing Facility was not sufficient to reduce the number of colonies to the level that would have achieved the geometric mean of 200.

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DURATION OF THE NONCOMPLIANCE

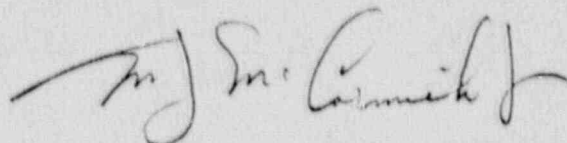
The period of noncompliance began sometime after the Discharge 001 sample was collected on August 7, 1990 and ended prior to the Discharge 001 sample being collected on August 9, 1990. The duration of the noncompliance can only be estimated to be approximately 40 hours because the fecal coliform samples are required to be taken once a day and it takes a minimum of 24 hours to obtain analysis results. During this period an estimated quantity of 56 million gallons of processed water was discharged to the East Branch of Perkiomen Creek.

CORRECTIVE ACTION

Upon receiving notification on August 10, 1990 of the analysis result, the Operations personnel working at the Water Processing Facility were directed to gradually increase the ozone concentration in the process with additional sampling and analysis for fecal coliform being performed by RMC Environmental Services to confirm that the number of colonies in Discharge 001 was decreasing.

PREVENTION OF FUTURE OCCURRENCES

The Water Processing Facility was still going through its start-up and testing phase of operations when this noncompliance incident occurred. The operating personnel were still evaluating the operation of the ozone treatment process and trying to determine the appropriate concentration of ozone to generally maintain in the process. By the time the fecal coliform sampling period started in September, the ozone concentration was being maintained around 4 percent and the results from this period indicated better than a 90 percent reduction in the geometric mean below the value determined for August fecal coliform results. It is expected that current ozonation levels will be sufficient to prevent recurrence.



M. J. McCormick, Jr.
Plant Manager

cc: U.S. Nuclear Regulatory Commission ✓
Document Control Desk
Washington, D.C. 20555

Administrator Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Station Resident NRC Inspector
Tom Kenny, M.C. # NRC

Program Management Section (3WM52)
Permits Enforcement Branch
Water Management Division
Environmental Protection Agency
Water Permits Section
Region III
841 Chestnut Building
Philadelphia, PA 19107

Department of Environmental Resources
Bureau of Water Quality Management
1875 New Hope Street
Norristown, PA 19401