

John K. Wood  
Vice President, Nuclear440-280-5224  
Fax: 440-280-8029February 22, 2001  
PY-CEI/OEPA-0347L

50 - 440

Ohio Environmental Protection Agency  
Northeast District Office  
2110 E. Aurora Rd.  
Twinsburg, OH 44087-1969

Ladies and Gentlemen,

In accordance with Ohio Environmental Protection Agency (OEPA) Permit No. 3IB00016\*ED, this letter serves as confirmation of a telephone report of a Noncompliance Notification per Part III, Section 12.C. Also included is the information required by Part III, Section 12.B, per the direction of Mr. Todd Taylor of the OEPA.

Per Part III, Section 12.B, the following information is provided:

1. **The times at which the discharge occurred, and was discovered:** The discharge occurred between 1200 on 2/18/01 and 1130 on 2/20/01. It was discovered on 2/18/01 at 1200 and the source was identified at 2300 on 2/18/01.
2. **The approximate amount and the characteristics of the discharge:** It is estimated that 15000 gallons of water was discharged out to the ground. The discharge was Lake Water that came from the circulating water system. This water is normally treated with chlorine and scale inhibitor. However, those treatments were suspended on 2/16/01 in preparation for chemical cleaning of the system. The chemical used to clean the system was Ferroquest LP7202. The concentration during the discharge was a maximum of 870 ppm by calculation. Samples taken at the emanating ground water were as follows:

<u>Date</u>	<u>Time</u>	<u>pH</u>
2/18/01	1330	7.00
2/19/01	0200	6.57
2/20/01	0945	8.12
2/20/01	1045	8.29

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3. **The stream affected by the discharge:** The minor stream impoundment, outfall 3IB00016007.
4. **The circumstances which created the discharge:** A leak from an underground pipe.
5. **The names and telephone numbers of the persons who have knowledge of these circumstances:** Shift Supervisor, Al Rabenold 440-280-5647, Environmental Specialist, Leo Harte 440-280-5514.
6. **What remedial steps are being taken:** The Ferroquest concentration in the system was reduced to less than 72 ppm. The system was shutdown at 1130 on 2/20/01. The area affected by the discharge was flushed with Lake Water using the plant fire fighting system. The pipe will be repaired prior to returning the system to operation.
7. **The names and telephone numbers of the persons responsible for such remedial steps:** Shift Supervisor, Al Rabenold 440-280-5647, Environmental Specialist, Leo Harte 440-280-5514, and System Engineer, Kurt Zaharewicz 440-280-5588

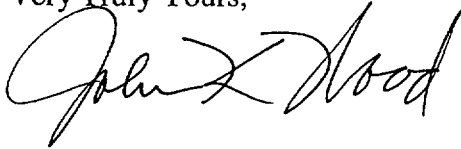
Per Part III, Section 12.C, the following information is provided:

1. **The limitation which has been exceeded:** The final concentration of Ferroquest LP7202 discharging to Lake Erie limited to 72 mg/L.
2. **The extent of the exceedance:** The maximum concentration of Ferroquest discharged to the ground was 870 mg/L. The actual concentration reaching the lake is unknown. It was calculated that a maximum of 135 lbs. of Ferroquest was discharged to the ground over the entire discharge period.
3. **The cause of the exceedance:** The leak from an underground pipe.
4. **The period of the exceedances including exact dates and times:** The exceedance occurred between 1200 on 2/18/01 to 1130 on 2/20/01.
5. **If uncorrected, the anticipated time the exceedance is expected to continue:** The exceedance is corrected.
6. **Steps taken to reduce, eliminate, and/or prevent recurrence of the exceedance:** The concentration of Ferroquest LP7202 was reduced and the system was shutdown to stop the discharge. The standing groundwater was flushed with Lake Water to reduce the concentration of Ferroquest LP7202. The damaged pipe will be repaired prior to restarting the system.

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If you have any questions or require additional information, please contact Mr. Leo Harte at (440)-280-5514.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "John X. Hood". The signature is fluid and cursive, with a large "X" in the middle.

cc: NRC Region III  
NRC Resident Inspector  
NRC Project Manager  
NRC Document Control Desk (Docket No. 50-440)