

Exelon Generation Company, LLC
LaSalle County Station
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Exelon
Nuclear

November 28, 2001

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Notification of Noncompliance for Exelon Generation Company,
LLC - LaSalle County Station NPDES Permit No. IL0048151

In accordance with the 30 day notification requirements of Appendix B, "Environmental Protection Plan," to Facility Operating Licenses NPF-11 and NPF-18, Section 5.4.2, "Nonroutine Reports," notification is being provided of a noncompliance with the Exelon Generation Company (EGC), LLC - LaSalle County Station National Pollutant Discharge Elimination System (NPDES) Permit.

On October 31, 2001, a small oil sheen was released to the Illinois River from the Make-Up Water Intake Screen Backwash, NPDES Outfall 002, at the River Screen House. One hour notifications were made to the National Response Center and the Illinois Emergency Management Agency. A four hour Emergency Notification System (ENS) notification was made to NRC. In accordance with Special Condition 12 of the NPDES permit, a Notice of NPDES Noncompliance letter is also being submitted. A copy of this notice is attached.

Should you have any questions concerning this letter, please contact Mr. William Riffer, Regulatory Assurance Manager, at (815) 415-2800.

Respectfully,



Mark A. Schiavoni
Plant Manager
LaSalle County Station

Attachment

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - LaSalle County Station

IE23

EXELON GENERATION COMPANY, LLC
LASALLE COUNTY STATION
NPDES PERMIT NO. IL0048151
NONCOMPLIANCE REPORT

Outfall Name and Number

Illinois River Make-Up Water Intake Screen Backwash, NPDES Outfall 002

Parameter and Permit Limit

Oil was discharged from NPDES Outfall 002 this caused a visible sheen in noncompliance with the General Effluent Standards in 35 Illinois Administrative Code, Subtitle C, Section 304.106. NPDES Permit, Standard Condition 25, requires compliance with this regulation. This outfall is not permitted for the discharge of Oil and Grease.

Noncompliance Description, Date and Duration

On October 31, 2001 at 1423 hours, a small visible sheen of oil had migrated into the Illinois River from the LaSalle County Station River Screen House. The River Screen House serves as a makeup structure, drawing water from the Illinois River and using three Lake Makeup Pumps to supply the Exelon Generation Company (EGC), LLC LaSalle County Nuclear Station cooling pond.

The above described noncompliance was caused by Lake Makeup Pump discharge valve actuator failures that occurred on September 12, 2001 and October 17, 2001. The hydraulic oil from these failures (Mobil SHC 626) leaked into a trough inside the River Screen House, which ultimately drains to the River Screen House forebay. In both instances, Lake Makeup Pumps were running, which caused the oil to be drawn in and captured inside the River Screen House travelling screen and pump impeller areas. This prevented the release of oil to the Illinois River through Outfall 002. However, suitable actions were not initiated to clean up the oil inside these normally inaccessible River Screen House areas, as it was believed that the oil had been dissipated with large amounts of makeup water and pumped up to the lake.

On October 25, 2001, the last operable Lake Makeup Pump tripped, leaving no pumps running. To facilitate maintenance on the actuators, the hydraulic system was shutdown on October 30, 2001, which caused additional oil to be released through the failed actuators. On October 31, 2001, station personnel observed oil floating in the forebay and initiated the required notifications.

Station chemical release procedures and the Spill Prevention Control and Countermeasures Plan were entered. The station Environmental Specialist and hazardous material response personnel were dispatched to the scene.

Approximately 5 gallons of hydraulic oil had migrated into the River Screen House forebay. The forebay is comprised of wing walls on either side and has a permanent floating log boom at the entrance. The majority of the oil was confined to the inside of this forebay area. However, a small portion was able to pass into the river due to gaps at either end of the boom. The RSH Travelling Screen backwash was in service at the time and provided a motive force that pushed

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the oil in the forebay toward the boom. The duration of this release is estimated to be approximately 24 hours. Immediate actions were taken to contain the accumulated oil in the forebay. The oil sheen released to the Illinois River quickly dissipated and became non-visible approximately 10 feet from the point of release. An environmental contractor was contacted, and cleanup of the forebay began immediately during the evening of October 31, 2001. The cleanup was completed on November 6, 2001.

The discharge of oil into or upon the navigable waters or adjoining shorelines of the Illinois River is reportable in accordance with 40 CFR 110.10. Notifications were made to the National Response Center, the Illinois Emergency Management Agency (IEMA), and the Nuclear Regulatory Commission (NRC).

Cause of Noncompliance

The apparent causes of the noncompliance were inadequate oil containment provisions at the River Screen House and failures to address suitable cleanup or compensatory actions for previously occurring oil leaks.

The environmental impact of this event is considered negligible. Calculated Oil and Grease worst case release rates were determined to be far below the lowest limits delineated in the Illinois Water Quality Standards. Also, review of Material Safety Data Sheet toxicity data for Mobil SHC 626 Oil stated that the oil was "practically non-toxic and non-irritating."

Corrective and Preventative Actions

Immediate corrective actions included, station personnel containing the spill with oil absorbent booms, securing the travelling screen backwash, verifying the integrity of the floating log boom, and mobilizing an environmental contractor for cleanup. An Apparent Cause Evaluation (ACE) of the event was performed.

Preventative actions have been assigned to Engineering to evaluate the cause of the failed actuators. Work Requests have been written to install a permanent oil boom across the entrance of the forebay and to place catch containers under the hydraulic valve actuators. Operating procedures will be revised to secure Travelling Screen backwash when no Lake Makeup Pumps are running and to check the RSH forebay once per shift if all pumps are off and backwash is running. The remaining actions are scheduled to be completed by January 12, 2002.

Name and Number of Facility Contact

Keith Francis, Environmental Specialist (815) 415-3211

Frederic D. Bevington, Environmental Specialist (815) 415-3243