

CATEGORY 1

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 AUTH. NAME AUTHOR AFFILIATION
 CHERNOFF, H.K. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: NPDES noncompliance notification: on 960904, sample results indicated that daily maximum limitation was exceeded for interanl outfalls 008 & 009.

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Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No: 12510D

Serial: RNP-RA/96-0192

NOV 05 1996

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT NO. SC0002925
SUBMITTAL OF PERMIT VIOLATION

Gentlemen:

By letter dated January 27, 1989, Carolina Power & Light (CP&L) Company committed to provide the NRC with copies of permit violations to the National Pollutant Discharge Elimination System (NPDES) Permit No. SC0002925 that required notification to the permitting agency for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. Enclosed is a copy of a notification submitted to South Carolina Department of Health and Environmental Control (SCDHEC) as Enclosure 2 to our letter dated October 28, 1996, from D. E. Young, CP&L, HBRSEP, Unit No. 2.

Questions regarding this matter should be referred to me at (803) 857-1437.

Very truly yours,

H. K. Chernoff
Manager - Licensing/Regulatory Programs

9611130450 961105
PDR ADOCK 05000261
S PDR

AHS/klb
Enclosure

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. J. Zeiler, USNRC Resident Inspector, HBRSEP

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United States Nuclear Regulatory Commission
Enclosure to Serial: RNP-RA/96-0192

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT NO. SC0002925
SUBMITTAL OF PERMIT VIOLATION

H. B. ROBINSON STEAM ELECTRIC PLANT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT NO. SC0002925
SEPTEMBER 1996

Report Required by National Pollutant Discharge Elimination System (NPDES)
Permit No. SC0002925, Part II.B.3, "Other Non-Compliance"

Non-Compliance

As stated in NPDES Permit No. SC0002925, Internal Outfalls 008 and 009, "Low Volume Wastes and Storm Water Runoff," the Oil and Grease daily maximum limitation is 20 mg/l. On September 4, 1996, sample results indicated that the daily maximum limitation was exceeded for Internal Outfalls 008 and 009.

Description of Non-Compliance

As required by NPDES Permit No. SC0002925, Part III.A.7, "Other Requirements," all permit parameters are to be sampled on the first Wednesday of each month and additional monitoring to meet the frequency requirements of the permit shall be performed by the permittee. The first samples for Internal Outfalls 008 and 009 were obtained on the first Wednesday as required. These samples were sent to Davis & Brown, Quinby, South Carolina, Laboratory I. D. 21117, for analysis of Oil and Grease. The data results were received by H. B. Robinson Steam Electric Plant (HBRSEP) on September 19, 1996, and the results indicated an Oil and Grease of 42.2 mg/l for Internal Outfall 008 and 22.5 mg/l for Internal Outfall 009. The second set of samples for the month were taken on September 18, 1996. We requested that Davis & Brown expedite the second set of sample analyses. Additionally, Internal Outfalls 008 and 009 were resampled and analyzed on September 23 and 25, 1996, by CP&L - Fossil Generating Plant, Laboratory I. D. 16552. The September 18, 1996, data results from Davis & Brown and the September 23 and 25, 1996, data results were within normal parameters for Oil and Grease. We investigated the source of the Oil and Grease intrusion, outage and maintenance activities, heavy rainfall that occurred the day previous to the sample, and any possibility of failure of treatment devices. Our evaluation of normal operating and outage activities, performance of treatment devices and visual inspections found no evidence of leaks or spills that could be attributed to be the cause for exceeding the daily maximum limitation for Oil and Grease. Investigation of the sample data results, which were within regulatory limits, and the results of our evaluation of facility operation have lead us to conclude that an error in sample preparation or analysis is the most likely explanation for the unacceptable Oil and Grease values. However, because our routine samples were analyzed by a non-Carolina Power & Light (CP&L) Company laboratory, the results obtained are too far removed from the date of sampling to conclusively identify and correct the cause for exceeding the daily maximum limitation for Oil and Grease.

Steps Being Taken to Reduce, Eliminate and Prevent Recurrence

We are evaluating continued use of an outside laboratory for Oil and Grease analysis.