

**NY NIAGARA
MOHAWK****FILE COPY**

(12)

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

April 15, 1983

Director Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Gentlemen:

Your letter dated March 11, 1983 issued Amendment No. 51 to the Facility Operating License No. DPR-63 for the Nine Mile Point Nuclear Station, Unit 1. This amendment deleted Appendix B Environmental Technical Specifications which pertained to non-radiological water quality related requirements. That letter requested that we keep the Commission informed about any changes or violations of the NPDES permit. This letter is to inform you that any changes or violations will be provided to the appropriate Regional Administrator and to the Director, Office of Nuclear Reactor Regulation.

Very truly yours,

C. V. Mangar

C. V. Mangar
Vice President

Nuclear Engineering & Licensing

CVM/MGM:bd

87-304-210066



ATTACHMENT #2



Attachment 2

Nine Mile Point SPDES Report of Non-Compliance Events

1. On January 15, 1996, the daily maximum level of total suspended solids in the effluent of the Sewage Treatment Plant (Outfall 030) was measured to be 62.5 mg/l. This exceeds the SPDES Permit limitation of 45 mg/l for this parameter. Initial investigation showed a marked decrease in microbial activity on January 15, 1996, and a slightly lower influent pH of 6.2. The cause of the event was determined to be starvation of the microbes due to a marked decrease in influent flow and low influent temperatures over the previous two days.

The process was reseeded with activated sludge. All lift stations were inspected for proper operability. All the lift stations were found to be operating, however, two lift stations were found to have one of two pumps inoperable. Influent volume to the plant will be tracked and reviewed to determine if nutrient addition is necessary prior to anticipated low volume periods. Microbial activity will also be track more closely to aid in identifying when potential starvation of the process may influence the operation of the sewage treatment plant.

A five day Report of Non-compliance Event was submitted on January 22, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 1 to this report.

2. On February 21, 1996, during a site inspection, the Region 7 Inspector inquired about the spill of some acidic water that occurred in August 1995 in the Unit 2 Screenwell Building. Specifically, the inspector inquired whether any of this spilled solution may have entered a nearby floor drain and been discharged to Lake Ontario via the storm sewer system.

A preliminary review by Niagara Mohawk determined that this event occurred on August 2, 1995 when a spill of approximately five gallons of a low pH solution occurred in the Unit 2 Screenwell Building at approximately 14:00. This resulted in approximately 100 ml of the low pH water entering a floor drain. The spill was contained, cleaned up, and postulated not to have reached the environment due to the excessive length (40') of the pipe and loop seal in the line from the floor drain to the storm sewer. However, no further action was taken to attempt to remove the low pH solution from the floor drain. Therefore, Niagara Mohawk concluded that the low pH solution had subsequently been flushed to the Unit 2 Storm Sewer.

Upon reaching the above preliminary conclusion, Niagara Mohawk made a telephone notification to the NYS DEC on February 22, 1996. A five day Report of Noncompliance Event was submitted on February 29, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 2 to this report.



Attachment 2 (continued)
Nine Mile Point SPDES Report of Non-Compliance Events

3. In late February 1996, evidence of an oily substance was observed being discharged from the Unit 1 Storm Sewer water discharge, Outfall 020, into Lake Ontario. On March 11, 1996, when the analytical results of a surface sample showed the presence of oil & grease (1840 mg/l), the event was reported to the NYS DEC Spill Hot Line, spill number 9515850 and the NYS DEC Region 7 Water Engineer was notified. The spill was also reported to the National Response Center and Spill Number 330556 was assigned.

Immediate corrective actions included the placement of booms and pads at the outfall to collect the oil sheen. A vendor was contracted to vacuum the stones and silt from within and around the outfall on March 13, 1996. The oil sheen appeared intermittently at the outfall through the rest of March and into April. During this period, the clean up vendor repeatedly cleaned the area around the outfall. Subsequent samples of the outfall on March 14 and 15 appeared to be clear, however, they still showed oil & grease concentration of 6.5 and 10.9 mg/l. Again on March 21 and 22, outfall samples were collected and found to have oil & grease concentrations less than 1 mg/l.

On March 26, 1996, however, there appeared to be a significant amount of oil globules collected on the absorbent booms placed at the outfall. The oily substance was collected for further analysis to characterize the type of oil. The analysis from the oil globules collected on March 26 showed the substance to be a light oil or diesel fuel.

At this time, the idea that the oily substance was from parking lot and roadway runoff due to normal spring thaw was discredited. On March 28, 1996, the Unit 1 Oil Spill Retention Basin was drained to Lake Ontario due to normal accumulation of water. During the drain down of the basin, it was noticed that an oil film had accumulated on the pond. The drain down was immediately terminated and a sample of the drain down water was obtained. The oil & grease concentration was found to be 1 mg/l.

On March 28, 1996, a sample of the oily layer was collected from the Oil Retention Basin and characterized. It was confirmed on March 29, 1996, that the oil collected from the Oil Retention Basin was very similar to the oil samples collected at the outfall. It was speculated that during the drain down of the Oil Retention Basin, the water level in the basin became low enough to expose the transformer containment drain line and allow a surge of oily water to enter the catch basin from the transformer area.



Attachment 2 (continued)
Nine Mile Point SPDES Report of Non-Compliance Events

3. (continued)

A third oil sample was collected from the Unit 1 main transformer and analyzed for characterization. The results mirrored those found in the Oil Retention Basin and at the outfall. It was concluded on March 30, 1996, that the source of oil at the outfall was transformer oil entering the Unit 1 Storm Sewer from the Unit 1 transformer area.

An investigation of the transformer area containment integrity was immediately initiated. Storm sewer remediation actions were initiated, which included pumping out several scupper drains in the area and plugging the storm sewer line adjacent to the transformer berm area.

Initially, it was thought a failed seal around the transformer containment drain line provided an avenue for oil to enter the storm sewer, however, excavation of the area indicated the seal was intact. Further excavation around the contaminated area and storm sewer pipe showed the oil to be escaping the transformer containment berm and traveling horizontally underground into the storm sewer. The section of storm sewer adjacent to the berm was isolated. The absorbent booms at the outfall were maintained due to evidence that the oil may have found pathways to two additional drains.

The cause of the oil entering the storm sewer was a breach in the integrity of the transformer containment berm. A thumb-size hole and dislodged section of the liner seam allowed oily water to exist the containment area and enter directly into the storm sewer drainage system. A contributing cause to this spill was a leaking transformer that provided the source oil in the containment area. A coupling on an oil recirculating line developed a small leak in October of 1995 while the plant was at full power. On March 30, 1996, the plant was shutdown for a one-week outage and the transformer leak rate increased substantially during that period.

The apparent failure of the transformer containment berm liner was from overheating of the liner during installation causing the liner material to become brittle. Subsequent settling of the support material beneath the liner provided a situation leading to a puncture in the vicinity of the voided support material.

The transformer containment berm was repaired and a large portion of the berm was inspected to evaluate any other potential failure locations.



Attachment 2 (continued)
Nine Mile Point SPDES Report of Non-Compliance Events

3. (continued)

The total amount of oil lost from the transformer was estimated to be 500 gallons; approximately 300 gallons of oil was accounted for during the spill remediation, and the amount of oil discharged into the Oil Retention Basin and the amount contained in the excavated soil was difficult to estimate. There was no practical way to estimate the oil that leaked prior to the occurrence at the outfall. Therefore, an assumption was made that some of the unaccounted 200 gallons eventually was discharged to Lake Ontario.

A five day Report of Non-compliance Event was submitted on March 15, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 3 to this report.

4. On March 20, 1996, it was discovered that a new film processor had been installed that was designed to direct the overflow of spent film developer into the site sanitary sewer system. Between January 25, 1996 and March 21, 1996, an estimated 2.5 gallons of spent developer, which may contain up to 2 percent hydroquinone of the sulfonated derivative of hydroquinone, was discharged to Lake Ontario via the sewage treatment facility. Upon discovery, the film processing unit was immediately shut down. A corrective action plan was developed to ensure the waste was handled in accordance with applicable State and Federal regulations.

A five day Report of Non-compliance Event was submitted on March 28, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 4 to this report.

5. On April 1, 1996, an unpermitted discharge of city water to the Unit 2 storm sewers, Outfall 001-002, was discovered. An underground isolation valve in the city water line developed a 1 to 2 gallon per minute leak that allowed city water to surface and flow into a near by storm water drain.

A five day Report of Non-compliance Event was submitted on April 8, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 5 to this report.



Attachment 2 (continued)

Nine Mile Point SPDES Report of Non-Compliance Events

6. On May 1, 1996, it was reported to the NYS DEC Division of Water that a condenser steam trap drain at Unit 1 was found to discharge directly to the service water discharge canal and not to the in-plant floor drain system as plant drawings show. Actual discharge of water via this pathway occurs only when the system is operating during plant outages. The system has operated twice in the past twelve months resulting in two unpermitted discharges and no monitoring for Oil & Grease, pH, or solids was performed.

A five day Report of Non-compliance Event was submitted to the NYS DEC Region 7 Division of Water on May 8, 1996 and is attached as Enclosure 6 to this report.

7. On May 18, 1996, approximately twenty (20) gallons of radioactive water penetrated a scupper drain during a test of the Unit 1 emergency condenser system and was discharged to the lake via Outfall 020. Co-60 was detected in the discharge water at a concentration of $2.83\text{E-}06$ microcuries/ml and tritium (H-3) was measured in water sampled at the outfall at a concentration of $1.43\text{E-}05$ microcuries/ml. A follow-up sample taken subsequent to the day of the test revealed no detectable radioactivity.

A five day Report of Non-compliance Event was submitted on May 24, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 7 to this report.

8. On September 23, 1996, it was reported to the Region 7 NYS DEC Division of Water that an unpermitted discharge of demineralized water occurred to the Unit 2 storm water sewer, Outfall 001-002. The event occurred during the pre-operative test of the service water biocide injection system.

A five day Report of Non-compliance Event was submitted on September 27, 1996, to the NYS DEC Region 7 Division of Water and is attached as Attachment 8 to this report.

9. On September 19, 1996, it was reported to the Region 7 NYS DEC Division of Water that an unpermitted discharge of city water occurred to the Unit 2 storm water sewer, Outfall 001-002. Less than 5 gallons of city water was discharged to the Unit 2 storm sewer.

A five day Report of Non-compliance Event was submitted on September 27, 1996, to the NYS DEC region 7 Division of Water and is attached as Enclosure 9 to this report.

Attachment 2 (continued)
Nine Mile Point SPDES Report of Non-Compliance Events

10. On September 28, 1996, fire retardant paint was observed to be washing off of painted wood which was stored outdoors during a heavy rain. Some of the water entered a nearby storm drain that discharges to Outfall 020, Unit 1 Storm Water Drainage.

A five day Report of Non-compliance Event was submitted on October 3, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 10 to this report.

11. On September 28, 1996 a hydraulic line on a forklift truck ruptured and approximately two gallons of hydraulic oil spilled onto the pavement. The spill occurred during a rainstorm and as a result an estimated one to two cups of hydraulic oil entered the Unit 2 Storm Water Drainage System, Outfall 001-002. The spill was report to the NYS DEC Hotline and the National Response Center on September 28, 1996, spill numbers 9608092 and 362783 respectively.

A five day Report of Non-compliance Event was submitted on October 3, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 10 to this report.

12. On October 16, 1996, it was reported to the Region 7 NYS DEC Division of Water that the permit limit for total suspended solids for two locations, Sump 4 and Manhole 110, that discharge to Outfall 007 were exceeded on October 2, 1996. Furthermore, the daily average total suspended solids for the month of October was calculated to be 59 mg/l, thus exceeding the limit of 30 mg/l. The unusually high values obtained in Sump 4 and Manhole 110 on the one occasion caused the daily average to be high. Subsequent samples taken from other Outfall 007 sources during the month showed suspended solids levels to be less than 4 mg/l.

A five day Report of Non-compliance Event was submitted on October 22, 1996, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 11 to this report.



Attachment 2 (continued)
Nine Mile Point SPDES Report of Non-Compliance Events

13. On January 31, 1997, the biocide injection skid tripped off line unexpectedly during routine biocide addition. Consequently, a sample collected after skid trip off showed a Total Residual Oxidant (TRO) level of 0.3 mg/l in the Unit 2 service water discharge, Outfall 040. This exceeds the SPDES Permit total residual oxidant limit of 0.2 mg/l for Outfall 040. The cause of the trip was determined to be loss of dilution water flow causing the sodium bisulfite pumps to automatically trip.

A five day Report of Non-compliance Event was submitted on February 6, 1997, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 12 to this report.

14. On April 25, 1997, a Waste Water Treatment Plant (Outfall 030) Operator discovered the sodium bisulfite pump had tripped off. Consequently, the plant's effluent Total Residual Chlorine (TRC) level was determined to be 1.25 mg/l. This constitutes an exceedance of the 0.5 mg/l TRC limit for Outfall 030. Investigation of the event discovered that the pump suction line was partially blocked, causing premature failure of the pump head diaphragm.

A five day Report of Non-compliance Event was submitted on May 2, 1997, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 13 to this report.

15. On May 13, 1997, during routine bimonthly sampling of the Unit 1 Administration Building Sump, Outfall 007, it was discovered that water in the sump contained a small amount of fire foam. The fire foam entered the sump from a floor drain in a foam storage room containing a holding tank that overflowed on April 30, 1997. The amount of fire foam that entered the sump was conservatively estimated to be one to five gallons. The sump containing the fire foam water mixture automatically pumped to the storm drainage system on at least two occasions, from April 30, 1997, to May 13, 1997, thus causing an unpermitted discharge.

During the investigation of the fire foam tank overflow, it was determined that fire foam contains up to 6 percent ethylene glycol. Using a 6 percent ethylene glycol fire foam solution, the amount of ethylene glycol released to the environment was than estimated to be 0.6 to 2.9 pounds. Since the Reportable Quantity (RQ) limit for ethylene glycol is 1 pound per 6 NYCRR Part 597 and 40 CFR Part 302.4, this release was classified as a hazardous substance release. The NYS DEC Hotline and the National Response Center were notified on May 30, 1997. Spill Number 9702587 and 389284 were assigned, respectively. Pursuant to 6 NYCRR Part 598, a 14-day report was submitted to the NYS DEC on June 13, 1997 and is attached as Enclosure 14.



Attachment 2 (continued)
Nine Mile Point SPDES Report of Non-Compliance Events

15. (continued)

The sump and all associated piping were cleaned prior to returning the sump to service. The Unit 1 fire foam system was permanently removed from service and the storage tanks were closed in accordance to 6 NYCRR Part 595 during December 1998. In addition to retiring the Unit 1 fire foam system, the NYS SPDES Permit was modified to allow trace amount of fire foam to be discharged through the wastewater treatment plant. This was done because Unit 2 still has an active fire foam system and this is an appropriate method of disposal for trace levels of fire foam.

A five day Report of Non-compliance Event was submitted on May 19, 1997, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 15 to this report.

16. On June 4, 1997, while performing plant rounds an operator noticed an oily water mixture draining from a circulating water pump to an area sump. The area sump periodically pumps to the service water discharge bay, Outfall 040. The operator isolated the area sump by placing the sump breaker to the open position. Cleanup of the pump and sump was completed by June 6, 1997. Prior to releasing the sump back into service, the pump was repaired and samples were collected for Oil & Grease and pH analysis. Oil & Grease was found to be <1 mg/l and pH was equal to 8.0. The NYS SPDES Permit was modified to monitor the area sumps for Oil & Grease on a monthly basis.

A five day Report of Non-compliance Event was submitted on June 10, 1997, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 16 to this report.

17. On April 15, 1998, the Decay Heat Cooling Tower blowdown, Outfall 001A, exceeded the daily maximum limit for Total Residual Chlorine (TRC). The TRC concentration at the discharge point was 0.26 mg/l, which exceeds the SPDES Permit limit of 0.2 mg/l TRC.

A five day Report of Non-compliance Event was submitted on April 22, 1998, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 17 to this report.



Attachment 2 (continued)

Nine Mile Point SPDES Report of Non-Compliance Events

18. On June 9, 1998, an Operator discovered the Decay Heat Cooling Tower (DHCT) basin temperature at 94 °F. The SPDES Permit limit for the DHCT basin temperature is 90 °F. The basin temperature exceedance was due to DHCT fans being turned off to support startup of the Residue Heat Removal System, normal plant cooling system, and the swap over of the spent fuel pool cooling pumps.

A five day Report of Non-compliance Event was submitted on June 16, 1998, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 18 to this report.

19. On November 21, 1998, during a routine security check, a security guard discovered an oil discharge (oil sheen) at Outfall 020, Unit 1 Storm Drainage. Subsequent investigation determined that a temporary storage tank containing diesel fuel had lost its entire contents, estimated at 600 gallons. A small portion of this oil migrated to the Unit 1 perimeter drainage system and into Outfall 020. Niagara Mohawk Power Corporation is working with the NYS DEC Region 7 Spill Response Unit to ensure the spill area is completely remediated.

A five day Report of Non-compliance Event was submitted December 1, 1998, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 19 to this report.

20. On December 2, 1998, diesel fuel was observed dripping from the bottom of a truck used to store diesel fuel. An estimated 2 cups of fuel was observed on the floor of a building having floor drains believed to drain to either Outfall 001, Unit 2 Storm Water Drainage, or Outfall 030, Sewage Treatment Plant. At the time of the spill notification, no fuel was observed entering the drain. However, it could not be confirmed that no fuel had entered the drain prior to this event. No oil sheen was observed at either Outfall.

A five day Report of Non-compliance Event was submitted December 10, 1998, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 20 to this report.

21. On December 30, 1998, a sample taken December 23, 1998, at the Unit 1 Administration Building Sump, Outfall 007, exceeded the daily maximum limit for total suspended solids (TSS). Sample results were received on December 30, 1998, of 88.5 mg/l TSS which exceeds the SPDES Permit limit of 50 mg/l.

A five day Report of Non-compliance Event was submitted January 7, 1999, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 21 to this report.



Attachment 2 (continued)
Nine Mile Point SPDES Report of Non-Compliance Events

22. On May 8, 1999, an Environment Protection Technician observed dried cement slurry near a storm drain leading to Outfall 020, Unit 1 Storm Drainage System. It was determined that a contractor had cleaned concrete mixing equipment the previous day in the stone area adjacent to the roadway in which the drain is located.

A five day Report of Non-compliance Event was submitted May 14, 1999, to the NYS DEC Region 7 Division of Water and is attached as Enclosure 22 to this report.



ENCLOSURE #1



January 22, 1996
NMP1L 1026

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 030 Sewage Treatment Plant Effluent

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the effluent suspended solids exceedence that we discussed during our telephone conversation of January 16, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the January 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,



Norman L. Rademacher
Plant Manager - Unit 1

NLR/CMM/kap
Enclosure

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. D. Howes
C. M. Merritt
K. A. Dahlberg



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. Bill McCarthy

DEC Region: 7

Report Type: X 5 Day X Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: Nine Mile Point Unit 1

Date of noncompliance: 1 / 15 / 96 Location (Outfall, Treatment Unit, or Pump Station): 030 Sewage Treatment Plant

Description of noncompliance(s) and cause(s): Daily Maximum Level of Suspended Solids in the Effluent was measured on 1/15/96 to be 62.5 ppm. The Limit is 45 ppm. Initial investigation showed a marked decrease in microbe activity on 1/15/96 and a slightly lowered pH (influent) of 6.2. The cause of the event was determined to be starvation of the microbes due to a marked decrease in influent flow over the previous two days.

Has event ceased? (Yes) (No) If so, when? 1/18/96 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 1 / 15 / 96, 21 : 00 (AM) (PM) End date, time of event: 1 / 18 / 96, 17:00 (AM) (PM)

Date oral notification made to DEC? 1 / 16 / 96, 1:10 (AM) (PM) DEC Official contacted: Bill McCarthy

Immediate corrective actions: The process was reseeded with active sludge. All lift stations were inspected for proper operation. All of the lift stations were found to be working fine.

Preventive (long term) corrective actions: A weekly review of water volume influent to the plant will be performed to determine if we need to add additional nutrients to the process on Friday. The weekly review will also track microbe activity more closely to help indicate when potential starvation effects will influence the operation of the sewage treatment plant.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

City Representative: Carey M. Merritt Title: Supervisor Envir. Prot. Date: 1 / 22 / 96

Phone #: (315) 349 - 4200 Fax #: (315) 349 - 1400



ENCLOSURE #2

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**NIAGARA
MOHAWK**

NINE MILE POINT NUCLEAR STATION/P.O. BOX 63, LYCOMING, NEW YORK 13093/TELEPHONE (315) 343-2110

February 29, 1996
NMP2L 1612

Mr. William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. Of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 007 - Floor and Equipment Drains

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the discharge of approximately 100 mL of a low pH water solution into the Unit 2 storm sewers that our staff discussed during a telephone conversation on February 22, 1996. This event occurred on August 2, 1995 when a spill of approximately five (5) gallons of the low pH solution occurred in the Unit 2 Screenwell Building at approximately 1400 hours, which resulted in approximately 100 mls entering the floor drain. The spill was contained, cleaned up, and postulated not to have reached the environment due to the excessive length (40') of pipe and loop seal in line from the floor drain to the storm sewer. However, no further action was taken to attempt to remove the low pH solution from the floor drain. Therefore, Niagara Mohawk must conclude that the low pH solution has subsequently been flushed to the Unit 2 Storm Sewer.

An internal Deviation Event Report (DER) has been generated and a full root cause will be performed to determine why the floor drain was not cleaned out as part of the post-incident actions. Also, this Root Cause will determine why the spill was not reported to the DEC at the time of the occurrence or at least included in the comments section of the August 1995 Discharge Monitoring Report.

As a follow up to the initial notification on February 22, 1996, the submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Condition.

Should you have any questions concerning this matter or require any further action on the part of Niagara Mohawk, please contact Mr. Carey M. Merritt, Supervisor of Environmental Protection at (315) 349-4200.

Sincerely,

Kim A. Dahlberg

Kim A. Dahlberg
Plant Manager - Unit 2

Page 2

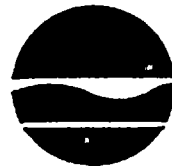
KAD/CDH/kap
Enclosure

xc: M. J. McCormick
D. J. Wolniak
G. M. McPeck
W. J. Holzhauser, Esq.
C. D. Howes
B. Zacharek



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. Bill McCarthy DEC Region: 7

Report Type: X 5 Day X Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Nine Mile Point Unit 2

Date of noncompliance: 8 / 2 / 95 Location (Outfall) Treatment Unit, or Pump Station: 007, Floor and Equipment Drains

Description of noncompliance(s) and cause(s): During a transfer operation of low pH water solution to a sump in the Unit 2 Screenwell, a spill occurred that resulted in approximately 100 ml of the solution (pH=2) by indication of litmus paper) entering a floor drain. Although none of the solution reached the environment at the time of the spill, subsequent flushing of floor drain between 3/2/95 and 2/22/96, resulted in the flushing of the low pH solution to the environment.

Has event ceased? (Yes) ^{May have} (No) If so, when? Unknown Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start time of event: 8 / 2 / 95 14:00 (AM) (PM) End date, time of event: unknown, (AM) (PM)

Date, time oral notification made to DEC? 2 / 22 / 96 16:30 (AM) (PM) DEC Official contacted: Bill McCarthy

Immediate corrective actions: An investigation into the event was performed on 2/22/96. A Deviation Event Report was initiated and a fact finding meeting was held with the individuals involved in the spill. A root cause is being performed with regard to the failure to remove the low pH water from the floor drain and subsequent failure to report the non-compliance event to the NYS DEC Region 7 office.

Preventive (long term) corrective actions: A revision to our Hazmat emergency response procedure to provide additional requirements to evaluate and prevent potential environmental consequences following a chemical spill. We are also intending to evaluate the possibility of changing the flow path of the floor drains in the Unit 2 Screenwell.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Cary M. MAA Title: Supervisor Date: 2 / 28 / 96

Phone #: (315) 349 - 4200

Environmental
Protection
Fax #: (315) 349 - 1400



ENCLOSURE #3



March 15, 1996
NMPIL 1046

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 020 Storm Drainage Unit 1, Perimeter Drains, Condensation Water

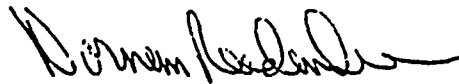
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the oil and grease discharge that we discussed during our telephone conversation of March 12, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the March 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,



Norman L. Rademacher
Plant Manager - Unit 1

NLR/CMM/kap
Enclosure

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. D. Howes
C. M. Merritt
J. T. Conway
R. B. Burtch



SECTION 1

New York State Department of Environmental Conservation
Division of Water

Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Nine Mile Point Unit 1

Date of noncompliance: 3 / 11 / 96 Location (Outfall, Treatment Unit, or Pump Station): 020 Storm Drainage Perimeter Drains

Description of noncompliance(s) and cause(s): During a routine radiological sample procedure, a foreign material was discovered floating on the surface of Outfall 020. Subsequent sample and analysis showed a level of oil and grease on the surface water of Outfall 020. Analyses show oil and grease levels to be 300-1840 ppm on the water surface. The cause is unknown, however, the substance appears highly emulsified and may be a build up of run-off oil over several weeks/months.

Has event ceased? (Yes) ☒ (No) ☐ If so, when? 3/12/96 Was event due to plant upset? (Yes) ☒ (No) ☐ SPDES limits violated? (Yes) ☒ (No) ☐

Start date, time of event: 3 / 11 / 96, 16 : 30 (AM) ☒ (PM) ☐ End date, time of event: 3 / 12 / 96, 11 : 20 (AM) ☒ (PM) ☐

Date, time oral notification made to DEC: 3 / 11 / 96, 17 : 30 (AM) ☒ (PM) ☐ DEC Official contacted: No. 282 Spill Hotline
Spill #95-15-850

Immediate corrective actions:

Oil absorbent pads/booms were placed in Outfall. An investigation of the oil source was initiated. A vacuum truck was brought in to remove residual oil and oily stones. More details of the cleanup operation will be disclosed in the March DMR.

Preventive (long term) corrective actions: At this time, the source of oil has not been determined, therefore, a corrective action cannot be implemented. Increased surveillance on the Outfall will continue until further evaluation. Details will be specified in the March DMR.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) ☐ (No) ☐

DEC Official contacted: _____ Date of DEC approval: 1 / 1

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Cary M. MTH Title: Supv. Env. Protection Date: 3 / 15 / 96

Phone #: (315) 349 - 4200 Fax #: (315) 349 - 1400



ENCLOSURE #4



March 28, 1996
NMPIL 1049

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 030 Sewage Treatment Plant


Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unpermitted discharge of film developer to the sanitary sewers that was discussed during a conversation with Mr. Carey Merritt on March 21, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the March 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action. For your interest, Mr. Merritt of our Nine Mile staff has spoken with chemists at Kodak, the developer manufacturer. The Kodak chemists indicated that the spent developer is likely to contain the mono-sulfonate derivative of hydroquinone, a much less reactive and less toxic form of hydroquinone.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,



Norman L. Rademacher
Plant Manager - Unit 1

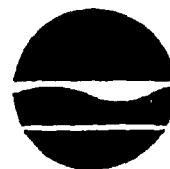
NLR/CMM/kap
Enclosure

xc: M. J. McCormick
D. J. Wolniak
G. M. McPeck
W. J. Holzhauer, Esq.
C. D. Howes
B. S. Zacharek



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy

DEC Region: 7

Report Type: ☒ 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Nine Mile Point

Date of noncompliance: 3 / 21 / 96 Location (Outfall) Treatment Unit, or Pump Station): 030 Sewage Treatment Plant

Description of noncompliance(s) and cause(s): Recently a new film processor was installed that is designed to direct the overflow of spent film developer chamber into the sanitary sewers. Since January 25, 1996 we have estimated 2.5 gallons of spent developer, which contains 2% hydroquinone, has been discharged to Lake Ontario via the sewage treatment facility.

Has event ceased? (☒ Yes) (No) If so, when? 3/21/96 Was event due to plant upset? (Yes) (☒ No) SPDES limits violated? (Yes) (☒ No)

Start date, time of event: 3 / 20 / 96, 1600 (AM) (☒ PM) End date, time of event: 3 / 21 / 96, 1000 (AM) (☒ PM)

Date, time oral notification made to DEC? 3 / 21 / 96, 1430 (AM) (☒ PM) DEC Official contacted: Mr. William McCarthy

Immediate corrective actions: The film processing unit was immediately shutdown and will remain shutdown until the preventative actions are implemented.

Preventive (long term) corrective actions: The developer overflow line will be redirected to a container and the spent developer will be disposed of as hazardous waste.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: _____ / _____ / _____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Carey M. Merritt Title: Supv. Env. Protection Date: 3/28/96

Phone #: (315) 349 . 4200 Fax #: (315) 349 . 1400



ENCLOSURE #5



April 8, 1996
NMP2L 1620

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 001, 002 Storm Sewers Unit 2

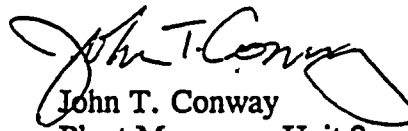
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unpermitted discharge of city water to the Unit 2 storm sewers that was discussed during a conversation with Mr. Carey Merritt on April 2, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the April 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,


John T. Conway
Plant Manager - Unit 2

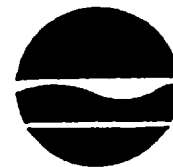
JTC/CMM/kap
Enclosure

xc: M. J. McCormick
D. J. Wolniak
G. M. McPeck
W. J. Holzhauer, Esq.
C. D. Howes



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Nine Mile Point Unit 2

Date of noncompliance: 4 / 2 / 96 Location (Outfall, Treatment Unit, or Pump Station): 001, 002 Storm Sewers

Description of noncompliance(s) and cause(s): Unpermitted discharge of city water to the Unit 2 Storm Sewers. An underground isolation valve in the city water line has a 1-2 gallon per minute leak. The water is surfacing and flowing to the Unit 2 Storm Sewers.

Has event ceased? (Yes) ☒ (No) ☐ If so, when? _____ Was event due to plant upset? (Yes) ☒ (No) ☐ SPDES limits violated? (Yes) ☒ (No) ☐

Start date, time of event: 4 / 1 / 96 4 : 30 (AM) (PM) End date, time of event: / / : (AM) (PM)

Time oral notification made to DEC? 4 / 2 / 96 9 : 17 (AM) (PM) DEC Official contacted: Mr. Scott Cook

Immediate corrective actions: A work order is being processed, including excavation permits to dig up area and fix the valve. We suspect the packing is bad causing the leak. The city water line cannot be isolated for an extended period due to the need for makeup water supply for nuclear operations and sanitary requirements.

Preventive (long term) corrective actions: Not necessary provided the corrective actions are implemented as planned. We are intending to seek a change to our current SPDES permit to allow for city water to be discharged out the Unit 2 Storm Sewers, similar to that allowed for Unit 1 Storm Sewers.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Carey M. Merritt Title: Supv. Env. Protection Date: 4 / 8 / 96

Phone #: (315) 349-4200 Fax #: (315) 349-1400



ENCLOSURE #6



May 8, 1996
NMP1L 1070

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 011 Unit 1 Wastewater

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unmonitored discharge of water from Unit 1 that Mr. Carey Merritt discussed during a telephone conversation on May 1, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the May 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,



Norman L. Rademacher
Plant Manager - Unit 1

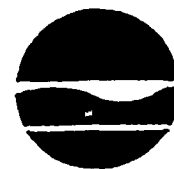
NLR/CMM/lmc
Enclosure

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt
J. T. Conway



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. Bill McCarthy

DEC Region: 7

Report Type: X 5 Day Permit Violation: Order Violation: Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-0001015 Facility: Nine Mile Point Unit 1

Date of noncompliance: 5 / 1 / 96 Location (Outfall, Treatment Unit, or Pump Station): 011 Unit 1 Waste Water

Description of noncompliance(s) and cause(s): A condensate steam trap drain line that appears on the drawings to drain to the inplant floor drain system was found to actually drain to the service water discharge canal. The periodic discharge (during plant outages) of condensate water was not monitored for pH, oil and grease and suspended solids.

Has event ceased? (Yes) (No) If so, when? 5/1/96 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Date, time of event: 5 / 1 / 96, 10:00 (AM) (PM) End date, time of event: 5 / 1 / 96, 11:00 (AM) (PM)

Date, time oral notification made to DEC? 5 / 1 / 96, 11:00 (AM) (PM) DEC Official contacted: Bill McCarthy

Immediate corrective actions: Drain line was isolated and hold out tags installed on the valves to prevent operation of the system.

Preventive (long term) corrective actions: The drain line will be rerouted to the inplant floor drain system.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Carey M. Merritt Title: Supv. Env. Protection Date: 5 / 8 / 96

Phone #: (315) 349-4200

Fax #: (349) 349-1400



ENCLOSURE #7





NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

FILE COPY

(112)

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

May 24, 1996
NMP1L 1076

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 020 Storm Drainage Unit 1 No. 1, Perimeter Drains, Condensation Water

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unpermitted discharge of radioactive water that was discussed during your telephone conversation with Carey Merritt on May 20, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the May 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,

Michael A. Belleggi for

Norman L. Rademacher
Plant Manager - Unit 1

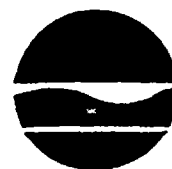
NLR/CMM/lmc
Enclosure

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt
J. T. Conway



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. Bill McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY- 0001015 Facility: Nine Mile Point Unit 1

Date of noncompliance: 5 / 18/96 Location (Outfall, Treatment Unit, or Pump Station): 020 Storm Drainage Unit 1

Description of noncompliance(s) and cause(s): During the emergency condenser test at Unit 1 (a 5 year requirement), approximately 20 gallons of low radioactive water (10^{-6} microcuries/ml) was discharged to the Unit 1 storm drains. Prior to the test, the road drains located in the area of the emergency condenser vent were covered to contain any condensed water from the test. One of the road drains did not seal completely and allowed water to enter the storm drains. The rate at which the water entered the storm sewers was about 1 to 2 gallons per minute.

Has event ceased? ☒ (Yes) ☐ (No) If so, when? 5/18/96 Was event due to plant upset? ☒ (Yes) ☐ (No) SPDES limits violated? ☒ (Yes) ☐ (No)

date, time of event: 5 / 18/96 11:30 (AM) (PM) End date, time of event: 5 / 18 /96 11:45 (AM) (PM)

Date, time oral notification made to DEC? 5 / 20/96 11:34 (AM) (PM) DEC Official contacted: Bill McCarthy

Immediate corrective actions: The second half of the test was delayed until the storm sewer cover was reconfigured to provide a better seal.

Preventive (long term) corrective actions: The details leading up to this event were discussed in a post-test critique and documented to ensure sensitivity of environmental impact prior to the next test.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: _____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also

SECTION 4

Facility Representative: Carey M. Merritt Title: Supv. Env. Protection Date: 05

Phone #: (315) 349-4200

Fax #: (315) 349-1400



ENCLOSURE #8



FILE COPY



GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

September 27, 1996
NMP1L 1133

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 001-002 Storm Drainage

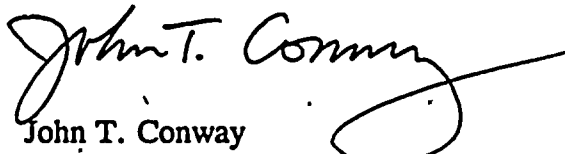
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unpermitted discharge of demineralized water that we discussed during our telephone conversation on September 25, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the September 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,


John T. Conway
Plant Manager - Unit 2

JTC/CMM/kap
Enclosure

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt





Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: X 5 Day _____ Permit Violation: _____ Order Violation: _____ Anticipated Noncompliance _____ Bypass/Overflow _____

SECTION 2

SPDES #: NY- 0001015 Facility: Nine Mile Point Unit 2

Date of noncompliance: 09 / 23 / 96 Location (Outfall, Treatment Unit, or Pump Station): 001-002 Storm Drainage

Description of noncompliance(s) and cause(s): Unpermitted discharge of demineralizer water to the Unit 2 storm sewers during the pre-operative testing of the Service Water Biocide Injection System. These demineralizer waters did not contain any Biocides during this discharge.

Has event ceased? (Yes) (No) If so, when? 9/23/96 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 09 / 23 / 96, 1 : 00 (AM) (PM) End date, time of event: 09 / 23 / 96, 1 : 45 (AM) (PM)

, time oral notification made to DEC? 09/24/96 11:15 (AM) (PM) DEC Official contacted: Eve
09/25/96 4:00 PM Mr. William McCarthy

Immediate corrective actions: Stop the drainage

Preventive (long term) corrective actions: Rerouted the drain hose to prevent drainage to the storm sewers.
These waters were rerouted to an approved discharge location.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: 1 / 1

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

Facility Representative: C. Merritt Title: Supv. Envir. Protection Date: 09/27/96

Phone #: (315) 349-4200 Fax #: (315) 349-1400



ENCLOSURE #9



FILE COPY

25

NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

September 27, 1996
NMP1L 1132

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 001-002 Storm Drainage

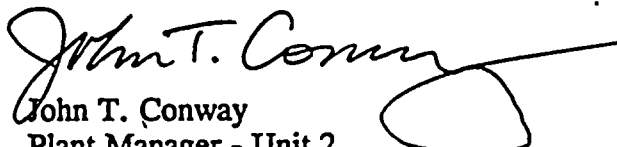
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unpermitted discharge of city water that we discussed during our telephone conversation of September 20, 1996. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the September 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,


John T. Conway
Plant Manager - Unit 2

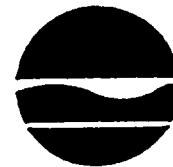
JTC/CMM/kap
Enclosure

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: X 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY- 0001015 Facility: Nine Mile Point Unit 2

Date of noncompliance: 09 / 19 / 96 Location (Outfall, Treatment Unit, or Pump Station): 001-002 Storm Sewers

Description of noncompliance(s) and cause(s): City water from the Alternate Decay Heat Removal System pre-operation testing was discharged to the Unit 2 storm sewers. Less than five gallons was allowed to flow from a leaking pipe connection to the storm sewers due to a misaligned catch containment and an inadequate floor drain cover. This constitutes an unpermitted discharge.

Has event ceased? (Yes) (No) If so, when? 09/19/96 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 09 / 19 / 96, 7:30 (AM) (PM) End date, time of event: 09 / 19 / 96, 118:35 (AM) (PM)

Time oral notification made to DEC? 09/20/96, 4:00 (AM) (PM) DEC Official contacted: Mr. William McCarthy

Immediate corrective actions: Catch containment realigned to contain leakage.

Preventive (long term) corrective actions: The pipe connection was repaired and the leak stopped.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Carey Merritt Title: Supv. Envir. Protection Date: 09/27/96

Phone #: (315) 349-4200 Fax #: (315) 349-1400



ENCLOSURE #10





FILE COPY

NIAGARA MOHAWK
GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

October 3, 1996
NMP1L 1137

Mr. William McCarthy
Environmental Engineer II
NYS Dept. Of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY-000-1015
Spill No. 9608092 and Outfall 020 Storm Sewer

Dear Mr. McCarthy:

This letter is submitted as a followup to your telephone conversation of October 2, 1996 with Mr. Mike McPeck regarding the following:

1. the hydraulic oil spill from a forklift truck hose rupture at Nine Mile Point Unit 2; and
2. ingress of fire retardant paint to Outfall 020 which washed off of painted wood during a heavy rain storm. A Report of Noncompliance Event for the fire retardant paint issue is enclosed.

The hydraulic oil spill occurred on September 28, 1996. A hydraulic line on a forklift truck ruptured and approximately two gallons of hydraulic oil spilled onto the blacktop. The spill occurred during a rain storm and as a result, about one to two cups of oil entered a storm sewer (Permit Outfall 001-002). The spill was reported via the New York State Department of Environmental Conservation Spill Hotline and the National Response Center on September 28, 1996. The assigned spill numbers are 9608092 and 362783, respectively.

On September 28, 1996, fire retardant paint was observed to be washing off of painted wood which was stored outdoors during a heavy rain storm. Some of the water was entering a nearby storm sewer (Permit Outfall 020). A Material Safety Data Sheet (MSDS) was obtained from the vendor on September 30, 1996, and Mr. Merritt tried to contact you at your office on this date and again on Tuesday. As you are aware, Mr. McPeck contacted you on Wednesday regarding this issue. Per your request, a copy of the MSDS is enclosed.

The Report of Noncompliance Event will be included with the September 1996 Discharge Monitoring Report (DMR) and the hydraulic oil spill will be noted in the comments section.



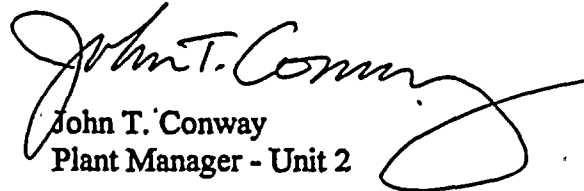
Page 2

Should you have any questions concerning this matter, please contact Mr. Carey Merritt at (315) 349-4200.

Very truly yours,



Norman L. Rademacher
Plant Manager - Unit 1



John T. Conway
Plant Manager - Unit 2

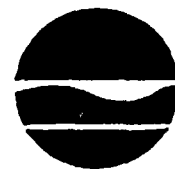
CMM/kap
Enclosures

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Nine Mile Point Nuclear Station

Date of noncompliance: 09 / 28 / 96 Location (Outfall, Treatment Unit, or Pump Station): Outfall 020

Description of noncompliance(s) and cause(s): Fire retardant paint from painted wood was observed to be washing off of the wood during a heavy rain storm and the water was entering a nearby storm drain.

Has event ceased? ☒ (Yes) (No) If so, when? 9/28/96 Was event due to plant upset? (Yes) ☒ (No) SPDES limits violated? (Yes) ☒ (No)

Start date, time of event: 09 / 28 / 96 16:15 (AM) ☒ (PM) End date, time of event: 09 / 28 / 96 17:20 (AM) ☒ (PM)

Date, time oral notification made to DEC? 10/02/96 11:36 (AM) ☒ (PM) DEC Official contacted: Mr. William McCarthy

Immediate corrective actions: The affected storm drain was covered to prevent further ingress. The wood was covered to prevent further contact with the rain.

Preventive (long term) corrective actions: The continued use of this paint under similar conditions will be evaluated.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: 1 / 1

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Carey M. Merritt Title: Supv. Envir. Protection Date: 10/3/96

Phone #: (315) 349-4200

Fax #: (315) 349-1400



WATER THINNED

Retardo Latex Fire Retardant Paint 220

Product Description

Type: A decorative, intumescent latex fire retardant paint.
Use: Interior ceilings, walls, trim, and similar surfaces constructed of primed or previously painted wood, drywall, cellulose tile, cured plaster, masonry, and metal.

Finish: Flat

Colors Available: White. May be tinted with up to 2.0 fl. oz. universal tinting colors per gallon. Special Moor-O-Matte prescriptions for additional colors made from White are available.

Package Sizes: Gallon and Five Gallon containers

Coverage:

Primed or Previously Painted Wood: 300 sq. ft. (27.8 sq. meters) per gallon for 2-coat application.

Primed or Previously Painted Drywall or Cellulose Tile: 200 sq. ft. (18.5 sq. meters) per gallon for 2-coat application.

Previously Painted Surfaces: 150 sq. ft. (13.9 sq. meters) per gallon for 1-coat application.

Dry Time:

To Touch— 1 hour to dust-free

To Handle— 1 hour

To Recoat— 4 hours

To Service— 4 to 6 hours

Mil Film Thickness:

Wet—5.3 mils @ 300 sq. ft. per gallon

Dry—2.4 mils @ 300 sq. ft. per gallon

Solids Content: By Weight—60% By Volume—46%

Weight Per Gallon: 10 lbs. 12 oz.

Viscosity: 75 ± 5 KU

Flash Point: None

Thinning/Cleanup: Thinning not normally required; when necessary use small amounts of clean water. Clean equipment immediately after use with warm, soapy water. Spray equipment should be given a final rinse with mineral spirits to prevent rusting.

Performance Characteristics

- When attacked by flame, IronClad Retardo Latex Fire Retardant Paint (220) expands and forms a thick cellular char blanket (intumescence) which, by reducing excessive heat penetration, retards flame spread and minimizes smoke development.
- Smooth-flowing.
- No unpleasant odor during application.
- Washes without spotting or loss of intumescence.
- Applies like a latex flat paint.
- Dries to a decorative matte finish.
- Rated Class "A" by Underwriters Laboratories as follows:

Underwriters Laboratories, Inc.
 Classified Fire Retardant Coating
 Fire Hazard Classification of Applied Coating
 (Based on 100 for untreated red oak)

SURFACE	DOUGLAS FIR		CELLULOSE TILE		CELLULOSE BOARD	
Flame Spread	20	20	20	20	20	20
Fuel Contributed	15	10	10	15	10	10
Smoke Developed	5	5	5	15	25	20
Number of Preliminary Coats	0	0	1*	0		1†
Rate per Coat (Sq. ft. per gallon)	—	—	470	—	—	250
Number of Fire-Retardant Coats	1	2	2	2	2	2
Rate per Coat (Sq. ft. per gallon)	150	300	300	200	200	200

* Manufacturer's Alkyd Enamel Underbody

† Manufacturer's Latex Enamel Underbody

Federal Specifications

Generic Equivalent

TT-P-001932

Environmental Considerations

Formulated without lead or mercury.

Finishing Systems

Wood, New:

Primer: Moore's Alkyd Enamel Underbody (217) applied at a spreading rate of 470 sq. ft. per gallon

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Wood, Repaint:

Primer: Prime or spot prime as needed with Moore's Alkyd Enamel Underbody (217)

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Plaster/Drywall, New:

Primer: 1 coat Moore's Latex Enamel Underbody (345) applied at a spreading rate of 250 sq. ft. per gallon

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 200 sq. ft. per gallon per coat

Plaster/Drywall, Repaint:

Primer: Prime or spot prime as needed with Moore's Latex Enamel Underbody (345)

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 200 sq. ft. per gallon per coat

Masonry, New:

Priming Rough or Pitted Masonry: 1 coat Moorcraft Interior & Exterior Block Filler (173)

Priming Poured and Precast Concrete: 1 coat Moore's Latex Enamel Underbody

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Masonry, Repaint:

Primer: Prime or spot prime as needed with Moore's Latex Enamel Underbody (345)

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Ferrous Metal, New:

Primer: 1 coat IronClad Retard-X Rust Inhibitive Latex Primer (162)

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Ferrous Metal, Repaint:

Primer: Prime or spot prime as needed with IronClad Retard-X Rust Inhibitive Latex Primer (162)

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Galvanized Iron, New:

Primer: IronClad Galvanized Metal Latex Primer (155)

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Galvanized Iron, Repaint:

Primer: Prime or spot prime as needed with IronClad Retard-X Rust Inhibitive Latex Primer (162)

Finish: Two coats IronClad Retardo Latex Fire Retardant Paint (220) at a spreading rate of 300 sq. ft. per gallon per coat

Application

Prior to painting, ensure having enough paint boxed or mixed in one container to complete an entire section. This practice is especially important with custom blended colors.

- Must be applied at the prescribed spreading rates and film thicknesses to meet requirements of the Class A Fire Retardant Rating.

- Do not apply when air and surface temperatures are below 5° (10°C).

- Stir thoroughly and apply as received in the container with a good quality brush or roller.

- Spray, Conventional: Thin as needed with small amounts of clean water.

- Spray, Airless: See General Information for specifications.



RETARDO #220 LATEX FIRE RETARDANT PAINT
WHITE

220 01 F	
Titanium Dioxide	5.6%
Polymeric Nitrogeous Phosphate	24.1% (M)
Vinyl Resin	12.3%
Pentaerythritol	6.9%
Chlorinated Paraffin	3.7%
Water	40.0%
Melamine Resin	7.4%
	<u>100.0%</u>

Caution 91



EMERGENCY AND FIRST AID PROCEDURES:

Inhalation - Remove to fresh air. Get medical help for any breathing difficulty.
Eye Contact - Flush thoroughly with water. Call physician.
Skin Contact - Wash with soap and water.
Ingestion - Drink 1 or 2 glasses of water to dilute. Do NOT induce vomiting. Call physician.

SECTION VI - REACTIVITY DATA

STABILITY: STABLE**HAZARDOUS POLYMERIZATION** WILL NOT OCCUR**HAZARDOUS DECOMPOSITION PRODUCT:** Burning may produce carbon dioxide and carbon monoxide.**CONDITIONS TO AVOID:** Elevated temperatures**INCOMPATIBILITY (MATERIALS TO AVOID):** None reasonably foreseeable.

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Flush with water. Absorb with sawdust or rags.

WASTE DISPOSAL METHOD:Conventional procedures in compliance with local, state and federal regulations.
Do not incinerate sealed containers.

SECTION VIII - SAFE HANDLING AND USE INFORMATION

RESPIRATORY PROTECTION:

Use NIOSH approved respirator specified for protection against paint spray mist and sanding dust in restricted or confined areas.

VENTILATION:

Adequate to maintain working atmosphere below T.L.V. and L.E.L. (See Sect. II for ingredient data and concentrations). Mechanical exhaust may be required in confined areas.

PROTECTIVE GLOVES: Waterproof during repeated contact.**EYE PROTECTION:** Splash goggles or safety glasses with side shields.**OTHER PROTECTIVE EQUIPMENT:** Clothing adequate to protect skin.**HYGIENIC PRACTICES:**

Remove and wash clothing before reuse. Wash hands before eating, smoking or using the washroom.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:

Do not throw or drop containers.

OTHER PRECAUTIONS:Avoid contact with eyes and prolonged contact with skin or breathing of spray mist or sanding dust.
Close container after each use. Keep out of reach of children. Do not take internally.



MATERIAL SAFETY DATA SHEET

Rev 22000.01A

For Coating, Resins, and Related Materials NPCA 1-84

MANUFACTURER'S NAME
BENJAMIN MOORE & CO.
51 CHESTNUT RIDGE RD.
MONTVALE, NJ 07645

EMERGENCY TELEPHONE NO. 800-424-9300

DATE OF PREPARATION
25-JUN-90

INFORMATION TELEPHONE NO.
201-573-9600

SECTION I - PRODUCT ID

PRODUCT CODE: 220
CLASS: WATER THINNED PAINT
NAME: I/C RETARDO LATEX FIRE RETARDANT
PAINT
COLOR: ALL

HMIS CODE	
Health: 1	
Flammability: 0	
Reactivity: 0	
Personal Prot.: 3	

SARA TITLE 312

Acute:	NO
Chronic:	NO
Fire:	NO
Pressure:	NO
React:	NO

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT	MAX PCT	CAS NO.	TLV	PEL	STEL	CEIL	MM Hg TEMP
Melamine (f3n)	7.4	108781	N/E	N/E	N/E	N/E	N/A
Pentaerythritol (f*)	6.9	115775	10mg/m3	10mg/m3			N/A
Titanium Dioxide (f+n)	5.4	13463677	10mg/m3	10mg/m3			N/A

f Federal Hazard List

* Hazardous only as dust when product is sanded.

3 Sect. 313 of the Emergency Planning & Community Right-To-Know Act of 1986 and of 40 CFR 372
n New Jersey Label Law hazardous chemical

SECTION III - PHYSICAL DATA

BOILING RANGE: N/A VAPOR DENSITY: HEAVIER THAN AIR WEIGHT PER GAL: 10.8 - 10.8
EVAPORATION RATE: SLOWER THAN ETHER & VOLATILE VOLUME: 51.8 - 51.8

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION: NOT REGULATED

FLASH POINT: >250°F PMCC

LEL: Not Applicable

EXTINGUISHING MEDIA: FOAM CO2 DRY CHEMICAL WATER FOG

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Closed containers may burst if exposed to extreme heat or fire.
Toxic gases may form when product burns.

SPECIAL FIREFIGHTING PROCEDURES:

Cool exposed containers with water. Use self-contained breathing apparatus.

SECTION V - HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE - ACUTE:

Inhalation - Irritation of the respiratory tract.

Skin and Eye Contact - Primary irritation.

Ingestion of large amounts could cause serious injury.

EFFECTS OF OVEREXPOSURE - CHRONIC:

None Known

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE:

None expected when used in accordance with Safe Handling and Use Information (Section VIII).

PRIMARY ROUTE(S) OF ENTRY: DERMAL INHALATION INGESTION



ENCLOSURE #11



36
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NIAGARA MOHAWK

**GENERATION
BUSINESS GROUP**

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

October 22, 1996
NMP1L1145

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 007 Floor and Equipment Drains

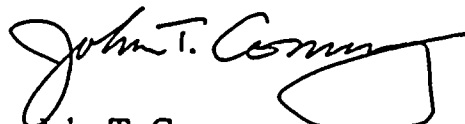
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the suspended solids limit exceedance detected in Outfall 007 during routine monitoring. The submittal of this Report of Noncompliance Event form satisfies the written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the October 1996 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,


John T. Conway
Plant Manager - Unit 2

JTC/CMM/llo
Enclosure

xc: M. J. McCormick
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. Bill McCarthy DEC Region: 7

Report Type: 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY- 0001015 Facility: Nine Mile Point Unit 2

Date of noncompliance: 10/2/96 Location (Outfall, Treatment Unit, or Pump Station): 007 Floor & Equipment Drains

Description of noncompliance(s) and cause(s):

During a routine monitoring sample of outfall 007, Sump 4 and manhole 110 exceeded the limit of solids. The outfall limit is 50 ppm maximum and the samples showed solids level of 263.8 and 195.6 ppm. In both sample locations the water level was low at the time the sample was drawn. The unusually high level of solids may be attributed to aspiration of solid from the bottom of the sample location thus creating a non-representative sample.
Has event ceased? ☒ (Yes) ☐ (No) If so, when? 10/16/96 Was event due to plant upset? ☒ (Yes) ☐ (No) SPDES limits violated? ☒ (Yes) ☐ (No)

Start date, time of event: 10/2/96 16:42 (AM) ☒ (PM) End date, time of event: 10/16/96 3:00 (AM) ☒ (PM)
Date, time oral notification made to DEC? 10/16/96 3:45 (AM) ☒ (PM) DEC Official contacted: Mr. Bill McCarthy

Immediate corrective actions: On 10/16/96 we received the analysis results from the 10/2 sample and immediately confirmed the results. We also performed a visual inspection of the sump on 10/16 and found the water to have very good clarity indicating a low solids content. Subsequent routine sampling on 10/9 showed solid level to be <3ppm in both the sump and at the manhole.

Preventive (long term) corrective actions: A review and observation of the technician's sampling technique will be performed and corrected if required. The sump bottom will be cleaned out after the refuel outage to remove any settled solids.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No) _____

DEC Official contacted: _____ Date of DEC approval: _____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Carey Merritt Title: Supv. Env. Prot. Date: 10/18/96

Phone #: (315) 349-4200

Fax #: (315) 349-1400



Continuation..

Section 2 - Description of Noncompliance and cause:

We were draining copious amounts of service water during early October in preparation of the refuel outage. Service water is the major source of input to Sump 4. The analyzed level of suspended solids in the sump, however, is much higher than typical service water.



ENCLOSURE #12





NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

12
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NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

February 6, 1997
NMP E0004

Mr. William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

**RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 040: Cooling Tower Blowdown and Service Water (Unit 2)**

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the Total Residual Oxidant (TRO) limit exceedance detected in Outfall 040 on January 31, 1996. The submittal of this Report of Noncompliance Event form satisfies the written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the January 1997 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,

Robert G. Smith
Operations Manager - Unit 2

RGS/CMM/kap
Enclosure

xc: C. D. Terry
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt



SECTION 1

*New York State Department of Environmental Conservation
Division of Water*

Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☐ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: NMPC Nine Mile Point Unit 2

Date of noncompliance: 01 / 31 / 97 Location (Outfall) Treatment Unit, or Pump Station): 040

Description of noncompliance(s) and cause(s): During a routine service water biocide addition, the biocide injection skid unexpectedly tripped offline at 10:20 a.m. due to low carrier water flow in the sodium bisulfite line. There existed a period when residual biocide was discharged from Outfall 040 without the sodium bisulfite neutralization. Consequently, a sample taken at 10:30 showed TRO levels to be 0.3 ppm which exceeds the 0.2 ppm TRO limit for Outfall 040.

Has event ceased? ☒ (Yes) (No) If so, when? 1/31/97 Was event due to plant upset? ☒ (Yes) (No) SPDES limits violated? ☒ (Yes) (No)

date, time of event: 01 / 31 / 97, 10:20 ☒ (AM) (PM) End date, time of event: 01/31/97, 11:05 ☒ (AM) (PM)

Date, time oral notification made to DEC? 02 / 03 / 97, 10:50 ☒ (AM) (PM) DEC Official contacted: Mr. William McCarthy

Immediate corrective actions: Followup samples taken at 11:05 and 11:30 showed TRO levels to be <0.2 ppm for Outfall 040. A Deviation Event Report was initiated to find out the cause of the biocide injection skid failure.

Preventive (long-term) corrective actions: A chemistry technician will be stationed at the biocide injection skid during future biocide additions, with specific response actions for skid failure, until the cause of the skid trip is determined and preventive actions are implemented. Specific preventive actions will be included in the January 1997 DMR.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also

SECTION 4

Facility Representative: Carey M. Merritt Title: Supv. Environmental Protection Date: / /

Phone #: (315) 349-4200

Fax #: (315) 349-1400



ENCLOSURE #13



FILE COPY



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

May 2, 1997
NMPE0019

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 030 Sewage Treatment Plant Effluent

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the effluent total residual chlorine exceedence that occurred on April 25, 1997. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the April 1997 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,

Norman L. Rademacher
Plant Manager - Unit 1

NLR/CMM/lmc
Enclosure

xc: C. D. Terry
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt
K. A. Dahlberg



SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: X 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY- 0001015 Facility: Nine Mile Point Unit 1

Date of noncompliance: 4/25 / 97 Location (Outfall) Treatment Unit, or Pump Station: 030 Waste Water Treatment

Description of noncompliance(s) and cause(s): At 6:20 a.m. on 4/25/97, the waste water treatment operator found the sodium sulfite pumps were shut down. The raw sewage pump was immediately shut down and an effluent sample was taken. The effluent sample showed a residual chlorine level of 1.25 ppm, which exceeded the 0.5 ppm limit. Records show that the waste water treatment plant was untreated for about 2.5 hours.

Has event ceased? (Yes) (No) If so, when? 4/25/97 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 4/24 / 97 15 : 50 (AM) (PM) End date, time of event: 4 / 25 / 97 07:15 (AM) (PM)

Date, time oral notification made to DEC: 4 / 25 / 97 10:55 (AM) (PM) DEC Official contacted: Mr. William McCarthy

Immediate corrective actions: The waste treatment plant raw sewage pumps were immediately shut down and the sulfite pump was restarted at 6:50 a.m. An effluent sample was taken at 7:15 a.m. and found residual chlorine levels to be <0.05 ppm.

Preventive (long term) corrective actions: The diaphragm material currently used in the pumps was changed to a more chemically compatible material and the frequency of pump inspection and maintenance was increased accordingly.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Mr. Carey Merritt Title: Supv. Env. Protection Date: 4 / 29 / 97

Phone #: (315) 349-4200 Fax #: (315) 349-1400



ENCLOSURE #14



66
FILE COPY



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

June 13, 1997
NMP1E 0026

Mr. John Piston
NYS Department of Environmental Conservation
Region 7
Division of Spills Management
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station Spill Investigation Report for Spill No. 9702587

Dear Mr. Piston:

Pursuant to the 14-day written notification requirement outlined in 6NYCRR Part 596.6(b)2, this letter is submitted along with the investigation information from a fire foam spill, which contained hazardous material ethylene glycol that occurred on April 30, 1997, at Nine Mile Point Unit 1. The spill was reported to the NYSDEC Hotline (Spill No. 9702587), on May 30, 1997.

If further information is required, please contact Carey M. Merritt, Supervisor Environmental Protection at (315) 349-4200.

Very truly yours,

Norman L. Rademacher
Plant Manager - Unit 1

NLR/KS/lmc
Enclosure

xc: C. D. Terry
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt
R. B. Burtch
W. McCarthy, DEC



SPILL NO. 97025587
FIRE FOAM REQUIRED QUANTITY DETERMINATION

Worst Case: 5 gallons spilled

Least Case: 1 gallon spilled

Facts: Fire foam is up to 6% Ethylene Glycol

Fire foam is 1.16 g/ml or 1.16 g/ml * 3785 ml/gal = 4390.6 g/gal

Required quantity for ethylene glycol is 1 lb (40CFR302.4)

Required Quantity Worst Case

5 gallons * 4390.6 g/gal * 1 lb/454 g = 48.351 lbs fire foam * 0.06 = 2.90 lbs

Required Quantity Least Case

1 gallon * 4390.6 g/gal * 1 lb/454 g = 9.671 lbs fire foam * 0.06 = 0.58 lbs



**SPILL NO. 97025587
FIRE FOAM SPILL**

Spill History

Fire foam is used at Nine Mile Point Unit 1 as a fire retardant. On April 30, 1997, during a routine tour of the Fire Protection Foam System, storage tank 11 was found to be overflowing onto the floor through a vent pipe located on top of the storage tank. Upon discovery, the Fire Department personnel contained the leakage and attempted to mitigate any leakage into the floor drain system. On May 13, 1997, during routine bi-monthly sampling of the Unit 1 Administration Building Sump, personnel performing the sampling noticed an apparent mixture of fire foam and water. Immediately the sump was isolated to prevent any additional discharge to Outfall 007. The sump had periodically discharged to Outfall 007 from April 30, 1997 to May 13, 1997. Investigation revealed that an estimated one to five gallons of fire foam went down the floor drain and entered the Unit 1 Administration Building Sump, Outfall 007. NYSDEC was notified about the unpermitted discharge on May 13, 1997. An internal investigation by NMPC was conducted to determine the cause of the presence of fire foam in the sump.

During the investigation of the fire foam overflow, it was discovered that fire foam contains less than or equal to 6 percent ethylene glycol. Based on the estimated volume of fire foam which may have entered the drain, the amount of ethylene glycol spilled was calculated to be 0.6 to 2.9 pounds. Since the reportable quantity for ethylene glycol is 1 pound, this spill was then classified as a hazardous substance spill. Calculations to determine the reportable required quantities per 40CFR302.4 and 6NYCRR Part 597 are attached. The spill was reported to the NYS Department of Conservation Spill Hotline and assigned Spill No. 9702587 on May 30, 1997.

Spill Cause

Investigation of the Fire Protection Foam System revealed a defective check valve that allowed the Fire Protection System to leak water into the Fire Protection Foam Storage Tanks. The storage tanks subsequently overflowed through a vent pipe located on the top of the tank. The vent pipe drains to the floor drain system which is collected in the Administration Building sump and pumps to Outfall 007.

Corrective Action

Unit 1 Administration Building Sump was isolated by opening the breakers to the sump pump. Likewise the Fire Protection Foam System was isolated and remaining contents of the storage tanks were removed. Prior to returning the Fire Protection Foam System back into service; the failed components will be repaired, Unit 1 Administration Building Sump will be cleaned and operating procedures will be modified to prevent recurrence.

Finally, the Fire Protection Foam Storage Tanks will be reviewed, and if necessary registered as chemical bulk storage tanks in accordance with 6NYCRR part 596.



ENCLOSURE #15



FILE COPY



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

May 19, 1997
NMP1E 0021

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 007 Floor and Equipment Drains

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unpermitted discharge of fire foam that occurred on May 13, 1997. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the May 1997 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,

A handwritten signature in cursive script, reading "John C. Aldrich" with "For" written below it.

Norman L. Rademacher
Plant Manager - Unit 1

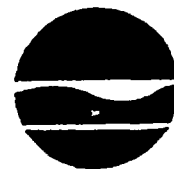
NLR/CMM/lmc
Enclosure

xc: C. D. Terry
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt
R. B. Burtch



SECTION 1

New York State Department of Environmental Conservation
Division of Water

**Report of Noncompliance Event**To: DEC Water Contact Mr. William McCarthy DEC Region: 7Report Type: X 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow**SECTION 2**SPDES #: NY- 0001015 Facility: Nine Mile Point Unit 1Date of noncompliance: 5 / 13 / 97 Location (Outfall) Treatment Unit, or Pump Station: 007, Floor and Equipment Drains

Description of noncompliance(s) and cause(s): During a routine sampling of the Unit 1 Administrative Building sump, it was discovered that the water in the sump contained a small amount of fire foam. An investigation revealed a fire foam holding tank overflowed on May 1, 1997, while the fire protection system was in normal automatic mode. The consequences of the foam tank overflow were not adequately evaluated and some fire foam eventually reached the sump. The sump containing the fire foam water mixture automatically pumped down at least twice (*cont!)
Has event ceased? (Yes) (No) If so, when? 5/13/97 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

date, time of event: 5 / 1 / 97 4 :00 (AM) (PM) End date, time of event: 5 / 13 / 97 11:30 (AM) (PM)time oral notification made to DEC? 5/13/97 4 :00 (AM) (PM) DEC Official contacted: William McCarthy

* between May 1st and the 13th, thus creating an unpermitted discharge.

Immediate corrective actions: The sump was isolated by opening the breakers to the sump pump. Likewise, the foam system has been isolated. Cleaning of the sump, floor drains and foam tank room have been initiated.

Preventive (long term) corrective actions: Maintenance troubleshooting will be performed on the foam storage system to determine the cause of the tank overflow. Upon determination of the cause of the overflow, the foam system and/or operating procedures will be modified to prevent recurrence

SECTION 3

Complete this section if event was a bypass:

Bypass amount: Was prior DEC authorization received for this event? (Yes) (No)DEC Official contacted: Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4Facility Representative: Carey Merritt Title: Supv. Env. Protection Date: 5/19 / 97Phone #: (315) 349-4200Fax #: (315) 349-1400



ENCLOSURE #16



(C4)

FILE COPY



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093/TELEPHONE (315) 349-1812
FAX (315) 349-4417

RICHARD B. ABBOTT
Vice President and
General Manager - Nuclear

June 10, 1997
NMPE 0024

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 040 Cooling Tower Blowdown and Service Water

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the unpermitted discharge of oily water that occurred on June 4, 1997. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the June 1997 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Carey Merritt at (315) 349-4200.

Very truly yours,

Richard B. Abbott
Vice President and General Manager - Nuclear

xc: C. D. Terry
G. M. McPeck
W. J. Holzhauer, Esq.
C. M. Merritt
R. B. Burtch

SECTION 1

New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: X 5 Day Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: Nine Mile Point Nuclear Station

Date of noncompliance: 6 / 4 / 97 Location (Outfall, Treatment Unit, or Pump Station): Outfall 040

Description of noncompliance(s) and cause(s): Noncompliance classified as a plant upset due to circulating water pump leaking oily water to sump 1A on 6/4/97. Sump operated at least twice during this time prior to isolation. Outfall 040 not permitted for oil and grease. Following sump isolation, oil and grease measured at a concentration of 53.8 ppm.

Has event ceased? (Yes) (No) If so, when? 6/4/97 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Date, time of event: 6 / 4 / 97 09:30 (AM) (PM) End date, time of event: 6 / 4 / 97 11:00 (AM) (PM)

Date, time oral notification made to DEC: 6 / 5 / 97 0918 (AM) (PM) DEC Official contacted: Christa Kenty

Immediate corrective actions: Circulating water sump 1A was isolated at ~1100 hours on 6/4/97. Clean up of pump area and sump area initiated and completed on 6/6/97. Prior to releasing sump to service, water sampled and analyzed for oil and grease. Result less than 1 ppm.

Preventive (long term) corrective actions: Long term corrective actions were to identify the source of the oily water and to repack the circulating water pump.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: 6 / 10 / 97

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Carey Merritt Title: Supv. Env. Protection Date: 6 / 10 / 97

Phone #: (315) 349-4200 Fax #: (315) 349-1400



ENCLOSURE #17



FILE COPY



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

April 22, 1998

NMPE 0071

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 001A, Decay Heat Cooling Tower Blowdown

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the total residual chlorine exceedance associated with the decay heat cooling tower blowdown, Outfall 001A, that Mr. Stoffle discussed with you on April 16, 1998. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the May 1998 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Janet Marsden at (315) 349-4200.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Don Bosnic".

Don P. Bosnic
Manager Operations - Unit 2

DPB/KES/lmc
Enclosure

xc: G. M. McPeck
W. J. Holzhauer, Esq.
J. H. Marsden
K. E. Stoffle



New York State Department of Environmental Conservation
Division of Water

Report of Noncompliance Event

To: DEC Water Contact William McCarthy

DEC Region: 7

Report Type: X 5 Day X Permit Violation Order Violation Anticipated Noncompliance Bypass/Overflow

SECTION 2

SPDES #: NY- 000 1015 Facility: Nine Mile Point Nuclear Generating

Date of noncompliance: 4, 15 / 98 Location (Outfall, Treatment Unit, or Pump Station): 001A

Description of noncompliance(s) and cause(s): Decay heat cooling tower blowdown, Outfall 001A, exceeded the daily maximum limit for total residual chlorine (TRC). The TRC concentration at the blowdown was 0.26 mg/l, which exceeds the SPDES limit of 0.2 mg/l TRC.

Has event ceased? (Yes) (No) If so, when? 4/15/98 02:57 Was event due to plant upset? (Yes) (No) SPDES limits violated? (Yes) (No)

Start date, time of event: 4 / 15 / 98 1: 30 (AM) (PM) End date, time of event: 4 / 15 / 98 2: 57 (AM) (PM)

Date, time oral notification made to DEC: 4 / 15 98 3 : 50 (AM) (PM) DEC Official contacted: W. McCarthy
(phone message)

Immediate corrective actions: Operations personnel secured decay heat cooling tower blowdown.

Preventive (long term) corrective actions: Operations department has added procedure steps to analyze the decay heat cooling tower prior to opening the blowdown line. The added procedure guidance will prevent this event from happening in the future.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Kent E. Stoffle

Title: Environmental Analyst Date: 4, 15, 98

Phone #: (315) 349-1364

Fax #: (315) 349-1400



ENCLOSURE #18



FILE COPY



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

June 16, 1998
NMPE 0082

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. Of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 001A, Decay Heat Cooling Tower Blowdown

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the discharge temperature exceedance associated with the decay heat cooling tower blowdown, Outfall 001A, that Mr. Stoffle discussed with you on June 11, 1998. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the June 1998 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Actions.

Should you have any questions concerning this matter, please contact Janet Marsden at (315)349-4200.

Very truly yours,

A handwritten signature in cursive script, reading "Kim A. Dahlberg".

Kim A. Dahlberg
Plant Manager - Unit 2

KAD/KES/sc
Enclosure

xc: G.M. McPeck
W.J. Holzhauer, Esg.
J.H. Marsden
K.E. Stoffle



SECTION 1

*New York State Department of Environmental Conservation
Division of Water*

Report of Noncompliance Event

To: DEC Water Contact William McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY- 000-1015 Facility: Niagara Mohawk Power Corporation, Nine Mile Point

Date of noncompliance: 06 / 09 / 98 Location (Outfall, Treatment Unit, or Pump Station): 001A

Description of noncompliance(s) and cause(s): During plant rounds, an Operator discovered the decay heat cooling tower (DHCT) basin temperature at 94°F. The permit limit for the DHCT basin temperature is 90°F. The basin temperature exceedance was due to the DHCT fans being secured to support startup of the Residue Heat Removal System, normal plant cooling system, and the swap over of the spent fuel pool cooling pumps.

Has event ceased? ☒ (Yes) (No) If so, when? 6/9/98 Was event due to plant upset? (Yes) ☒ (No) SPDES limits violated? ☒ (Yes) (No)

Date, time of event: 6 / 9 / 98, 6:00 (AM) ☒ (PM) End date, time of event: 6 / 9 / 98, 8:21 (AM) ☒ (PM)

Date, time oral notification made to DEC? 6 / 10 / 98, 10:21 (AM) ☒ (PM) DEC Official contacted: W. McCarthy
(left message)

Immediate corrective actions: Decay Heat Cooling Tower blowdown (Outfall 001A) was immediately secured.

Preventive (long-term) corrective actions: Nine Mile Point Unit 2 Operations Department has added procedure guidance, which includes increased equipment monitoring to ensure compliance with the SPDES Permit.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Kent E. Stoffle Title: Environmental Analyst Date: 6 / 10 / 98
Phone #: (315) 349-1364 Fax #: (315) 349-1400



ENCLOSURE #19



(162)

Niagara Mohawk

FILE COPY

December 1, 1998
NMPE 0110

Mr. William F. McCarthy, P.E.
New York State Department of
Environmental Conservation
Region 7
Division of Spills Management
615 Erie Boulevard West
Syracuse, NY 13204-2400

**RE: Nine Mile Point Nuclear Station
SPDES Permit #NY-000-1015
Outfall 020 Storm Drainage Unit 1**

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the diesel fuel oil spill that Mr. Michael McPeck of Niagara Mohawk discussed with you in a telephone conversation on November 23, 1998. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Condition.

This report will also be included with the November 1998 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning long-term corrective action.

Should you have any questions concerning this matter, please contact Ms. Janet Marsden at (315) 349-4200.

Sincerely,



Robert G. Smith
Plant Manager - NMP1

RGS/JHM/kap

xc: C. D. Terry
G. M. McPeck
W. J. Holzhauer
J. H. Marsden
D. J. Wolniak
C. Rossi, NYSDEC



SECTION 1

New York State Department of Environmental Conservation
Division of Water

Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☐ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: Nine Mile Point Nuclear Station Unit 1

Date of noncompliance: 11 / 21 / 98 Location (Outfall, Treatment Unit, or Pump Station): 020 Storm Drainage

Description of noncompliance(s) and cause(s): During a routine security check, a security guard discovered an oil discharge (oil sheen) at Outfall 020. Subsequent investigation determined that a temporary storage tank had lost its full contents (estimated at 600 gallons) to the ground. A small portion of this oil migrated to the Unit 1 perimeter drainage system and into Outfall 020. Cleanup actions were immediately taken and are currently ongoing.

Has event ceased? (Yes) ☐ If so, when? 11/25/98 Was event due to plant upset? (Yes) ☐ (No) ☒ SPDES limits violated? (Yes) ☐ (No) ☒

Start date, time of event: 11 / 21 / 98, 1500 End date, time of event: 11/25/98, 1031

Date, time oral notification made to DEC? 11/21/98, 1655 (PM) DEC Official contacted: #9810620: Spill Hotline

Immediate corrective actions: Plant personnel and the location Fire Dept (Scriba) deployed a harbor boom and absorbent pads and booms. A contractor was brought on site to contain and remediate the source of the spill and collect residual oil from the outfall. Remediation is ongoing and NMP is working with the NYSDEC Spill Response Unit from the 7 office.

Preventive (long-term) corrective actions: Continued cleaning of the storm drain system and the collection of product at the outfall until the spill is officially closed out with the DEC Spill Response Unit. NMP will revisit its procedures for transferring of products to temporary storage tanks.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Company Representative: Kent E. Stoffle Title: Environmental Analyst Date: 11/25/98
Phone #: (315) 349-4200 Fax #: (315) 349-1400



DAILY OIL & GREASE SAMPLE RESULTS: OUTFALL 020

SAMPLE DATE AND TIME	RESULTS IN PPM
11/21/98 @ 1530	7.6
11/22/98 @ 1055	2.6
11/23/98 @ 1516	5.2
11/24/98 @ 1005	3.5
11/25/98 @ 0833	1.8



ENCLOSURE #20



December 10, 1998
NMPE 0112

Mr. William F. McCarthy, P.E.
New York State Department of
Environmental Conservation
Region 7
Division of Spills Management
615 Erie Boulevard West
Syracuse, NY 13204-2400

**RE: Nine Mile Point Nuclear Station
SPDES Permit #NY-000-1015
Outfall 001 Storm Drainage Unit 2**

Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the diesel fuel oil spill reported to the spill hotline on December 2, 1998. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Condition.

This report will also be included with the December 1998 Discharge Monitoring Report (DMR) along with any additional information that may then be available.

Should you have any questions concerning this matter, please contact Ms. Janet Marsden at (315) 349-4200.

Sincerely,



Nicholas C. Paleologos
Plant Manager - NMP2

NCP/JHM/kap

xc: C. D. Terry
G. M. McPeck
W. J. Holzhauer
J. H. Marsden
D. J. Wolniak



SECTION 1

*New York State Department of Environmental Conservation
Division of Water*

Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7Report Type: ☒ 5 Day ☐ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow**SECTION 2**SPDES #: NY-000-1015 Facility: Nine Mile Point Nuclear StationDate of noncompliance: 12/02/98 Location (Outfall, Treatment Unit, or Pump Station): 001

Description of noncompliance(s) and cause(s): Diesel fuel was observed to be dripping from the bottom of a truck used to store diesel fuel. An estimated 2 cups of fuel was observed on the floor of a building having floor drains believed to discharge to outfall 001. At the time of spill notification, no fuel was observed in the drain. However, it could not be confirmed that no fuel had entered the drain prior. No sheen was observed at the lake and NMPC is not considering this event a release to navigable waters. The cause of the spill was believed to be due to overfill leakage from the fill port area of the truck.

Has event ceased? (Yes) ☐ If so, when? 12/2/98 @1500 Was event due to plant upset? (No) ☐ SPDES limits violated? (No) ☐Start date, time of event: 12/02/98, 1330 hrs End date, time of event: 12/02/98, 1500 hrsTime oral notification made to DEC? 12/02/98, 1440 hrs DEC Official contacted: Spill Hotline 9811017Immediate corrective actions: Oil sorbent materials deployed to floor of building and around floor drain. Truck wiped down. Area thoroughly and completely remediated.Preventive (long-term) corrective actions: Truck secured; drain plugs installed and inflated in building floor drains.**SECTION 3**Complete this section if event was a bypass:Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No) ☐

DEC Official contacted: _____ Date of DEC approval: ____/____/____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4Facility Representative: Barbara Zacharek Title: Environmental Analyst Date: 12/07/98Phone #: (315) 349-1248Fax #: (315) 349-1400



ENCLOSURE #21



January 7, 1999
NMPE 0117

William F. McCarthy, P.E.
Environmental Engineer II
NYS Dept. of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 007, Equipment and Floor Drains

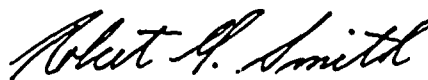
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the total suspended solids exceedance associated with the Unit 1 Administration Building sump, Outfall 007, that Ms. Marsden discussed with you on December 30, 1998. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the December 1998 Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Janet Marsden at (315) 349-4200.

Very truly yours,



Robert G. Smith
Plant Manager - Unit 1

/kap
Enclosure

xc: G. M. McPeck
W. J. Holzhauer, Esq.
J. Marsden
K. E. Stoffle



SECTION 1

*New York State Department of Environmental Conservation
Division of Water*

Report of Noncompliance Event

To: DEC Water Contact William McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: Nine Mile Point Nuclear Station

Date of noncompliance: 12 / 23 / 98 Location (Outfall, Treatment Unit, or Pump Station): 007

Description of noncompliance(s) and cause(s): A sample taken 12/23/98 at the Unit 1 Administration Building sump (Outfall 007) exceeded the daily maximum limit for total suspended solids (TSS). Sample results were received 12/23/98 of 88.5 ppm which exceeds the SPDES permit limit of 50 ppm. The sump pump was placed back in service 12/17/98 following retirement of the fire foam system after a period of approximately 17 months. Initial investigation indicates the major source of water to this sump is condenser cooling water (City Water) from the elevation 250 Ft. Chemistry Department area air conditioner. When this water flows into the sump there is a potential for turbulence which could cause the sediment in the bottom of the sump to be agitated. Excess sediment may have accumulated in the sump due to the 15 month out of service time thereby causing the exceedance once put into service.

Has event ceased? (Yes) If so, when? 12/30/98 Was event due to plant upset? (No) SPDES limits violated? (Yes)

Start date, time of event: 12/23/98, 0825 (AM) End date, time of event: 12/30/98, 0900 (AM)

Date, time oral notification made to DEC? 12 / 30 / 98, 10:30 (AM) DEC Official contacted: Mr. W. McCarthy

Immediate corrective actions: The pump was secured until new sample results could be obtained. Two samples taken on 12/30/98 at low and high sump levels respectively showed results of 19.7 ppm and <1 ppm at which point the pump was placed back in service.

Preventive (long-term) corrective actions: A Deviation/Event Report (DER), a report internal to NMPC, was initiated to determine the cause of the high solids level. Steps will be taken to prevent future occurrences based on the findings of the root cause determination.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Janet Marsden Title: Supervisor Environmental Protection Date: 01 / 05 / 99

Phone #: (315) 349-4200

Fax #: (315) 349-1400



ENCLOSURE #22



May 14, 1999
NMPE 0140

William F. McCarthy, P.E.
Environmental Engineer II
New York State Department of
Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

**RE: Nine Mile Point Nuclear Station
SPDES Permit Number NY 000-1015
Outfall 020, Storm Drainage Unit 1**

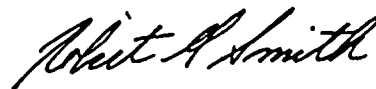
Dear Mr. McCarthy:

This letter is submitted along with the enclosed Report of Noncompliance Event regarding the SPDES unpermitted discharge reported to you on May 10, 1999. The submittal of this Report of Noncompliance Event form satisfies the five (5) day written notification as contained in the SPDES Permit General Conditions.

This report will also be included with the May 1999, Discharge Monitoring Report (DMR) along with any additional information that may then be available concerning the Preventive (long-term) Corrective Action.

Should you have any questions concerning this matter, please contact Janet Marsden at (315) 349-4200.

Very truly yours,



Robert G. Smith
Plant Manager - NMP1

/kap
Enclosure



SECTION 1

*New York State Department of Environmental Conservation
Division of Water*

Report of Noncompliance Event

To: DEC Water Contact Mr. William McCarthy DEC Region: 7

Report Type: ☒ 5 Day ☐ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow

SECTION 2

SPDES #: NY-000-1015 Facility: Nine Mile Point Nuclear Generating Station

Date of noncompliance: 05 / 08 / 99 Location (Outfall, Treatment Unit, or Pump Station): Outfall 020

Description of noncompliance(s) and cause(s): At 12:30 p.m., an Environmental Technician observed dried cement slurry near a storm drain leading to Outfall 020. It was determined that a contractor on site had cleaned concrete mixing equipment the previous day in the stoned area adjacent to the roadway in which the drain is located. The control room was contacted and samples for pH and TSS were collected at Outfall 020, Storm Drainage Unit 1. The results were 8.36 pH and 12 ppm TSS. The event was reported as an unpermitted discharge on May 10, 1999.

Has event ceased? (Yes) If so, when? 5/8/98 Was event due to plant upset? (No) SPDES limits violated? (No)

Start date, time of event: 05/08/99 12:30 (PM) End date, time of event: 05/08/99, 1:30 (PM)

time oral notification made to DEC? 05 / 10 / 99, 9:30 (AM) DEC Official contacted: Mr. William McCarthy

Immediate corrective actions: A berm was constructed to prevent runoff from entering the roadway. The storm scupper drain was blocked off.

Preventive (long-term) corrective actions: The contractor was interviewed and the SPDES permit requirements were discussed. A Deviation Event Report, a corrective action report internal to Nine Mile Point was initiated to develop long term preventive actions.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: / /

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Janet H. Marsden Title: Supervisor Environmental Protection Date: 5/14/99

Phone #: (315) 349-4200

Fax #: (315) 349-1400

