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May 21, 1990

Mr. Steven Zobel
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233

Dear Mr. Zobel:

REFERENCES: (a) NYSDEC Letter Dated May 17, 1990
(b) NYSDEC Letter Dated May 18, 1990

This letter is in response to the above referenced letters concerning our plans and procedures for diverting surface drainage water away from the retention pond during heavy rainfall.

The enclosed revised procedures, EP-18 and EP-19, the drawing of the storm drain at S-7, and the photographs of the diversion point at S-7 are submitted in response to your questions contained in reference (a).

Reference (b) poses questions about how the decision will be made to divert the water and what limit will be maintained on the water level in the retention pond. The water level in the retention pond is managed according to weather conditions. During dry weather, the water is sampled for analysis of radionuclide concentration when the level in the pond reaches 25" and the pond is pumped to the 001 outfall when the assay results are known and the water is within acceptable limits. During rainy weather, the water is sampled for analysis when the level in the pond reaches 20" and the pond is pumped to the 001 outfall when the assay results are known. The actual level of the water in the pond at the time the assay result is received depends upon the precipitation rate. If precipitation is heavy, continuous pumping of the pond will be initiated at which time the level in the pond is monitored and hourly samples of the pond and S-7 are analyzed for radionuclides. If continuous pumping cannot keep up with the inflow to the retention pond and the level reaches 40", management will be notified and the water at S-7 will be diverted before the level reaches 45" on the retention pond gauge.

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These procedures, short of the S-7 diversion, have been effective to date without experiencing any adverse affect on the integrity of the dam. If we start diverting S-7 at a lower level, we believe that diversion will occur more frequently than it is necessary.

Very truly yours,

J. J. McGovern
Plant Manager

JJMcG/bjc

Enclosures
cc: Dr. Bores - NRC

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A. OBJECTIVE:

It is possible that excessive rainfall could cause the 001 drainage pipe flow capacity to be exceeded and ultimately could lead to the failure of the retention pond dam. This condition could be avoided if surface drainage water from the southern part of the property could be diverted away from the retention pond at S-7.

B. PROCEDURE:

The procedure for emergency diversion of surface drainage water from S-7 to the reservoir is as follows:

The Environmental Group of the Health, Safety and Environmental Affairs Department will monitor weather forecasts. If heavy rains are predicted (> 1" per hour), a heavy rain alert condition shall be established.

During heavy rain alerts:

1. Environmental person on duty or on call shall notify Reactor Operations and Boiler House Operator of possible heavy rain.

2. S-7 water shall be sampled and analyzed for radionuclides at 12 hour intervals.

3. When continuous pumping from retention pond is initiated, S-7 and S-12 shall be sampled and analyzed hourly in preparation for diversion of S-7 water from the retention pond.

4. The Reactor Operator shall note the level of any water in the primary water storage tank and monitor the tank level gauge every hour. (Log entries shall be made of hourly readings). If there is any unexplained change in the level it shall be considered an Unusual Event under the Emergency Plan and appropriate notifications shall be made.

5. If, while in the continuous pumping mode due to heavy rainfall, the water level in the retention pond cannot be maintained below 45" on the gauge, S-7 shall be diverted away from the retention pond. (Refer to procedure EP-19 for diverting S-7 from retention pond).

6. S-7 water shall be sampled and analyzed hourly for presence of radionuclides during the time that S-7 is diverted away from the retention pond.

7. When precipitation has abated, S-7 water will be redirected to the retention pond as soon as it is practical.

EMERGENCY PROCEDURE - S-7 EMERGENCY DIVERSION PROCEDURE EP-19

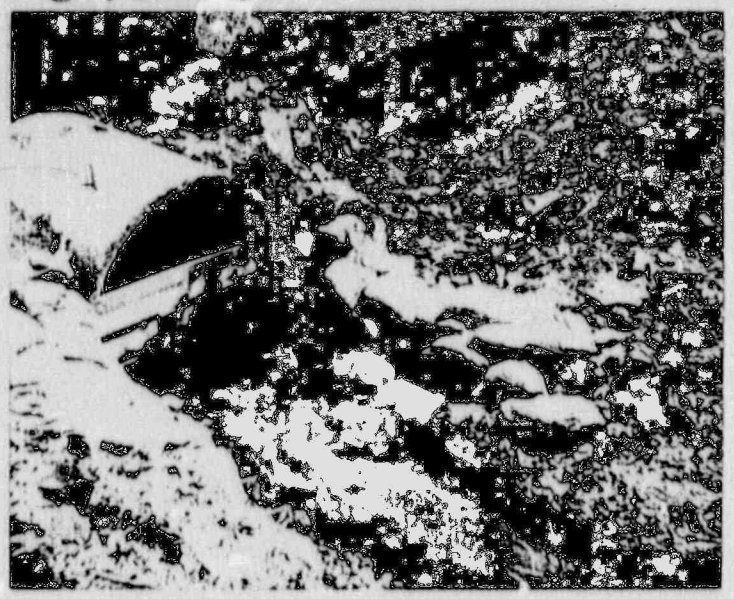
A. OBJECTIVE:

To divert a major portion of S-7 flow to the reservoir in the event that storm water flow emergency circumstances arise under which reliance on the approved method for emptying the retention pond will not enable preservation of the physical integrity of the retention pond or storm water in-flow to the retention pond exceeds 700 GPM.

B. PROCEDURE

1. Call DEC and send FAX and notify NRC within one hour after initiating the diversion of S-7.
2. Remove sand bags from diversion trench.
3. Insert wood baffle into guides.
4. Monitor the flow into pond. If the pump capacity is still exceeded, add more baffles. Continue to add baffles until the flow into the pond is manageable with the existing pumping system.
5. Monitor pond level after storm and remove baffles when pumps can maintain the water level at 20" in the retention pond. (Reverse the process in Step 4).
6. Once the water level drops below diversion trench, fill trench with sand bags.
7. Inspect diverter guides, trench and run off area to check for damage.
8. Within one hour after stopping diversion of S-7 water call and FAX DEC, call NRC.

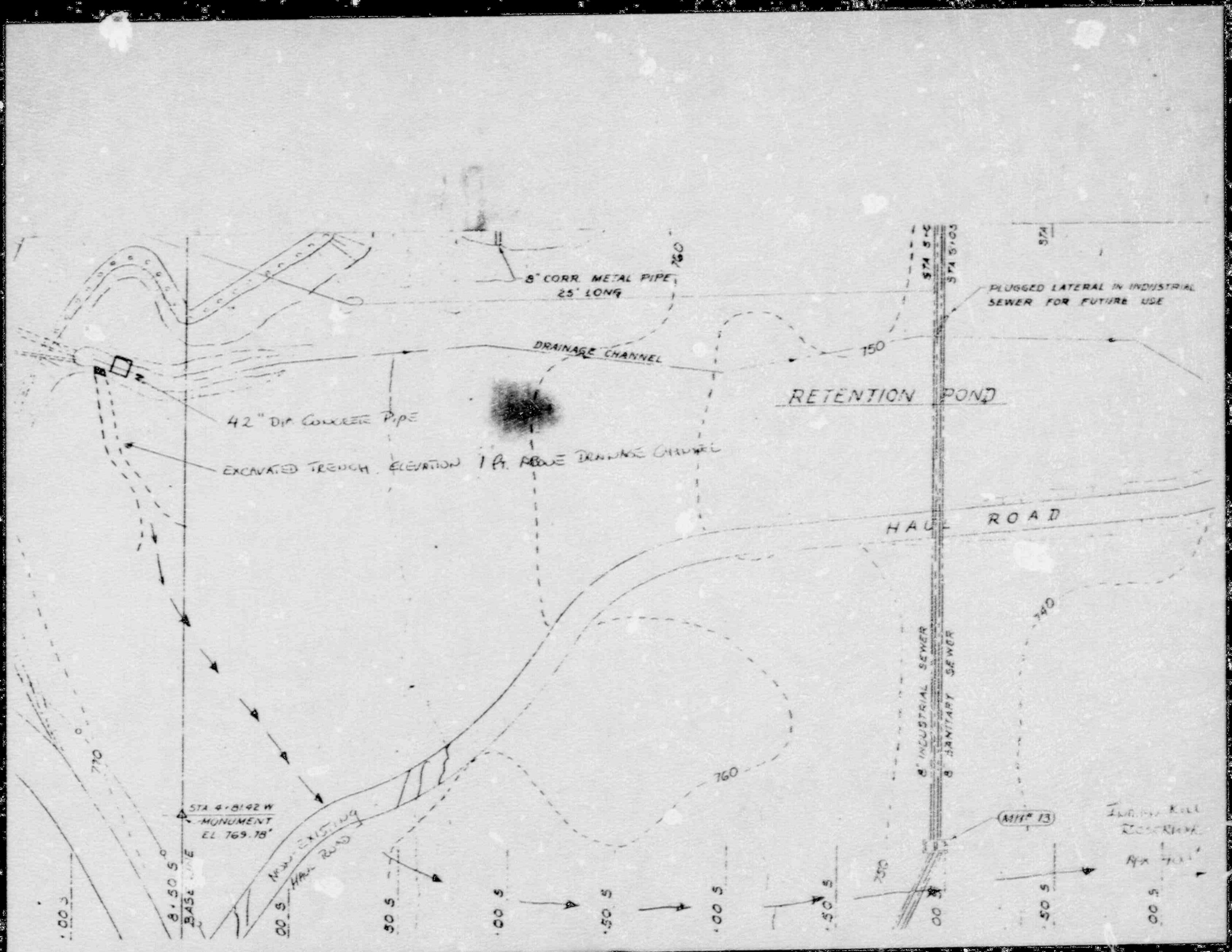
DIVERSION CONDITION

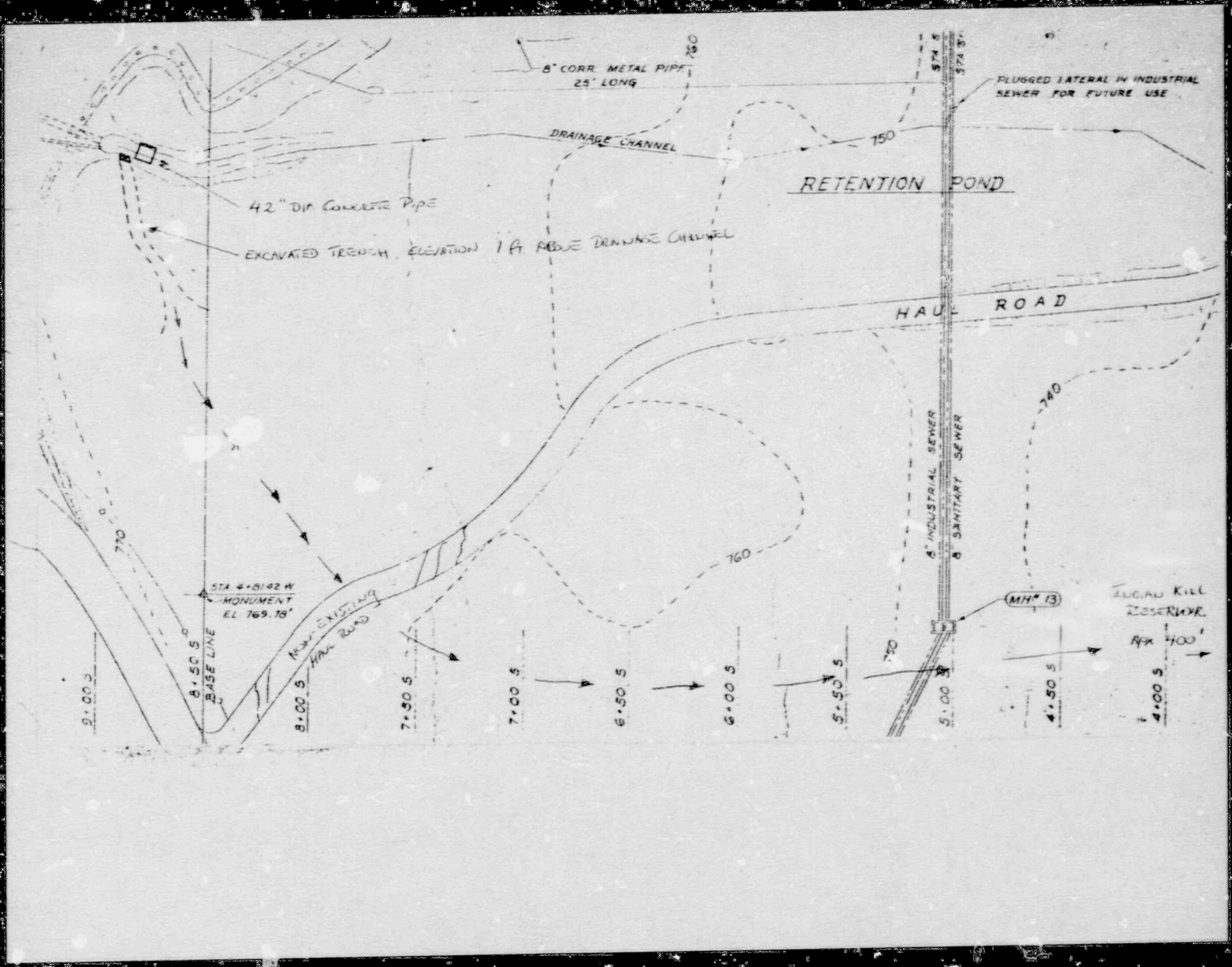


4' ϕ concrete pipe

When water is diverted, sand bags are removed from the right side of the culvert.

NORMAL CONDITIONS


8" CORR. METAL PIPE
25' LONG
PLUGGED LATERAL IN INDUSTRIAL SEWER FOR FUTURE USE
DRAINAGE CHANNEL
42" DIA. CONCRETE PIPE
EXCAVATED TRENCH. ELEVATION 1 Ft. ABOVE DRAINAGE CHANNEL
RETENTION POND
HAUL ROAD
8" INDUSTRIAL SEWER
8" SANITARY SEWER
STA 4+81.42 W
MONUMENT
EL 769.78'
BASE LINE
NEW EXISTING
HAUL ROAD
MH# 13
750
760
740
770


8" CORR. METAL PIPE 25' LONG
PLUGGED LATERAL IN INDUSTRIAL SEWER FOR FUTURE USE
DRAINAGE CHANNEL
RETENTION POND
42" DIP CONCRETE PIPE
EXCAVATED TRENCH, ELEVATION 1 FT. ABOVE DRAINAGE CHANNEL
HAUL ROAD
8" INDUSTRIAL SEWER
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EL. 769.78'
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NOW EXISTING HAUL ROAD
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INDIAN KILL RESERVOIR
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770
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