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Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
ENVIRONMENTAL PROTECTION PLAN
ANNUAL ENVIRONMENTAL OPERATING REPORT FOR 1992

Gentlemen:

Pursuant to Section 5.4.1 of the Environmental Protection Plan (Appendix B to CPSES Unit 1 Facility Operating License No. NPF-87), TU Electric hereby submits the CPSES Unit 1 1992 Annual Environmental Operating Report in the attachment to this letter.

If you have any questions, please contact Richard S. Berk at (214) 812-8952.

Sincerely,

William J. Cahill, Jr.

By: D. R. Woodlan
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Docket Licensing Manager

RSB/ds
Attachment

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TU ELECTRIC
COMANCHE PEAK STEAM ELECTRIC STATION
UNIT 1
1992
ANNUAL ENVIRONMENTAL OPERATING REPORT
(NON RADIOLOGICAL)

I. INTRODUCTION

This report describes implementation of the Environmental Protection Plan (EPP) for the calendar year 1992 as required by Appendix B to Unit 1 Facility Operating License NPF-87.

II. SCOPE

Section 5.4.1 of the EPP requires that Comanche Peak Steam Electric Station (CPSES) submit to the NRC an Annual Environmental Operating Report that shall address the following environmental protection activities:

- A. Summaries and analyses of the results of the environmental protection activities required by Section 4.2 of the EPP, including a comparison with related preoperational studies, operational controls (as appropriate), and previous nonradiological environmental monitoring reports, and an assessment of the observed impacts of plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, a detailed analysis of the data and a proposed course of mitigating action is required. Section 4.2 of the EPP pertains to results from:
 - 1. Groundwater levels and station water use monitoring.
 - 2. Water treatment facility outages impact assessment and reporting.
- B. The report shall also include:
 - 1. A list of EPP noncompliance and the corrective actions taken to remedy them.
 - 2. A list of all changes in station design and operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental question.
 - 3. A list of non-routine reports submitted in accordance with Subsection 5.4.2.

4. A summary list of National Pollutant Discharge Elimination System (NPDES) permit-related reports relative to matters identified in Subsection 2.1 which were sent to the EPA Region VI during the report period. Subsection 2.1 of the EPP pertains to aquatic matters that are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement (effects of intake structure on aquatic biota during operation) contained in the EPA NPDES station wastewater discharge permit.

III. RESULTS OF ACTIVITIES

- A. Summaries and analyses of the results of the environmental protection activities required by Subsection 4.2:

1. Groundwater Pumpage

As indicated in Table 1, groundwater pumpage during 1992 averaged 33.2 gals./min. (gpm) or 17,398,900 total gallons withdrawn for the year. The withdrawal rate was slightly higher (2.2%) than the 1991 average pumpage rate of 32.5 gpm.

Rates fluctuated significantly during the last five months of 1992. For example, rates increased to a yearly high of 50.6 gpm in October, then decreased to 19.2 gpm and 18.2 gpm during November and December, respectively. The sudden decrease in withdrawal rates coincided with the discovery and repair of two potable water distribution line leaks. In addition, as Unit 2 construction progressed toward completion, the resulting decrease in site population contributed to the decrease in potable water consumption.

All groundwater withdrawn during 1992 was used for potable and sanitary purposes only and no groundwater was used to supplement the station's Surface Water Treatment System.

The average annual pumpage rate of 33.2 gpm for 1992 represents approximately 26% of the predicted operational pumpage (127 gpm) identified in the Station's Environmental Report-Operating License Stage (Section 3.3) and approximately 21% of the actual average withdrawal rate (158 gpm) reported in the station's Final Environmental Statement - Operating Licensing Stage (Section 5.3.1.2) for the period 1975 to May 1979.

The combined annual rate for all recorded preoperational groundwater pumpage averaged 68.8 gpm. The average operational pumpage for the period 1990 through 1992 was 31.2 gpm. Therefore, the average operational rates were 55% lower than the groundwater pumpage during the preoperational period.

2. Groundwater Levels

As indicated in Table 2, the groundwater level (depth to water table) in the on-site observation well OB-3 (entrance to Plant Access Road) fluctuated during 1992 from a high level in April and June of 248.7 ft. to a low level in November of 256.3 ft.. Overall the water level in OB-3 during the reporting period (January through December) decreased 2.9 ft. However, as illustrated by Figure 1, the annual average water level for 1992 was greater (+ 1.7 ft.) than the 1991 average water level for OB-3.

The groundwater level in observation well OB-4 (Squaw Creek Park) fluctuated during 1992 from a high level in May, June, and August of 264.8 ft to a low level in November of 271.2 ft. Overall, the water level in OB-4 during the reporting period decreased 2.3 ft. However, the annual average water level for 1992 was 0.8 ft. greater than the 1991 average water level for OB-4 (Figure 1).

3. Surface Water Treatment System Operation

The station's Surface Water Treatment System processed 25,000,000 total gallons during 1992 for use as station make-up water. There were no outages during 1992 that required reporting in accordance with Section 4.2.2 of the EPP. As indicated in Section III.A.1., there was no treated surface water supplied to the potable water system in 1992.

B. EPP Noncompliance and Corrective Actions-Subsection 5.4.1(1)

There were no non-compliances with the requirements of the EPP during the reporting period.

C. Changes In Station Design or Operation, Tests, and Experiments Made in Accordance With Subsection 3.1 Which Involved a Potentially Significant Unreviewed Environmental Question

There were no changes in station design or operation, nor tests or experiments conducted during the reporting period that are reportable under this subsection.

- D. Non-routine Reports Submitted In Accordance With Subsection 5.4.2
- There were no non-routine reports submitted under this Subsection.

- E. NPDES Permit-Related Reports Relative To Matters Identified In Subsection 2.1

Routine monthly Discharge Monitoring Reports (DMR) for all wastewater outfalls were submitted to the EPA and Texas Water Commission (TWC) for each month during 1992. The following is a summary list of correspondence submitted to the EPA relating to these DMRs.

<u>MONTH MONITORED</u>	<u>LOG NUMBER/DATE</u>
January	TXX-92109/ 02-25-92
February	TXX-92168/ 03-25-92
March	TXX-92213/ 04-24-92
April	TXX-92259/ 05-22-92
May	TXX-92313/ 06-25-92
June	TXX-92360/ 07-24-92
July	TXX-92411/ 08-24-92
August	TXX-92461/ 09-25-92
September	TXX-92524/ 10-23-92
October	TXX-92579/ 11-25-92
November	TXX-92625/ 11-25-92
December	TXX-93047/ 01-25-93

There were six (6) wastewater permit non-compliances during 1992. These non-compliances are described below.

1. Two non-compliances were reported for Outfall 601 (Metal Cleaning Waste and/or Occasional Low Volume Wastes) in February, 1992. These non-compliances occurred when a single sample was taken when discharging from the Total Retention Pond in preparation for pond modifications. The sample exceeded the permitted iron concentrations of 1.0 mg/l, average and 1.0 mg/l, maximum. The probable source of the high iron level was corrosion of an iron coupling adjacent to the sample tap and insufficient flushing of sample tap prior to sampling. Samples taken within the pond prior to discharge revealed iron levels to be less than permitted limit. The exceedance of the maximum iron concentration required submittal of a separate report to the Texas Water Commission (TXX-92145 dated March 10, 1992).
2. In July, 1992 one non-compliance was reported for Outfall 101 (Wastewater Management System) due to a pH excursion. This non-compliance was associated with a low pH value and corrective actions were taken to re-adjust the system pH. A Root Cause Analysis (ONE Form 92-740) was performed to help prevent future similar occurrences.
3. In August, 1992, two non-compliances were reported for Outfall 401 (Unit 2 Flush Water System) during 1992. Both non-compliances resulted from "no data reported" for total suspended solids due to sample hold times being exceeded.
4. There was one non-compliance reported for Outfall 002 (Reservoir Discharge to Squaw Creek) during August, 1992. The permitted temperature limit of 93°F was exceeded by 1°F. The cause of the non-compliance resulted from the sample being collected at the surface water (above thermocline) and not at the routine location where the actual discharge is from below the thermocline. The routine sample valve was unavailable for sample collection due to mechanical problems.

No on-site spills occurred during 1992 that required reporting in accordance with the TWC's 24-hr. notification requirements. Although not required, a written notification was made at the request of the Texas Water Commission (TXX-92090 dated February 10, 1992) to report one occurrence of a sewage lift station overflow.

TABLE 1
SUMMARY OF GROUNDWATER PUMPAGE
For 1992
(Total-Gallon/Average-Gal/Min)

Month	PLANT WELL 1 TOTAL/AVG.	PLANT WELL 2 TOTAL/AVG.	NOSF WELL 1 TOTAL/AVG.	NOSF WELL 2 TOTAL/AVG.	TOTALS TOTAL/AVG.	DAYS AVG PER USE MONTH
January	1,301,800 30.13	0 0.00	122,600 2.84	91,900 2.13	1,516,300 35.10	30
February	1,293,400 29.94	0 0.00	124,100 2.87	149,500 3.46	1,567,000 36.27	30
March	1,068,900 23.94	0 0.00	189,100 4.24	145,600 3.26	1,403,600 31.44	31
April	518,900 12.01	582,000 13.47	120,100 2.78	124,600 2.89	1,345,600 31.15	30
May	539,500 12.08	603,800 13.53	119,900 2.69	119,300 2.67	1,382,500 30.97	31
June	587,000 13.59	513,400 11.88	94,600 2.19	95,500 2.21	1,290,500 29.87	30
July	749,900 15.32	751,700 15.35	101,100 2.07	116,200 2.37	1,718,900 35.11	34
August	626,300 14.99	964,600 23.10	75,800 1.82	68,600 1.64	1,735,300 41.55	29
September	768,600 15.70	946,200 19.33	67,700 1.38	82,700 1.69	1,865,200 38.10	34
October	1,130,700 28.04	765,900 19.00	65,500 1.62	78,900 1.96	2,041,000 50.62	28
November	475,600 11.79	192,100 4.76	49,000 1.21	55,600 1.39	772,300 19.15	28
December	516,100 12.36	155,000 3.71	36,700 0.88	52,900 1.27	760,700 18.22	29
TOTAL	9,576,700 18.27	5,474,700 10.45	1,166,200 2.22	1,181,300 2.25	17,398,900 33.19	364

TABLE 2
1992 SUMMARY OF GROUNDWATER
LEVELS IN OBSERVATION WELLS
(DEPTH TO WATER TABLE)

MONTH	WELL OB-3 (G-3) FT	WELL OB-4 (G-4) FT
JANUARY*	251.3	267.4
FEBRUARY*	249.8	266.5
MARCH*	248.8	265.6
APRIL*	248.7	265.2
MAY*	249.2	264.8
JUNE*	248.7	264.8
JULY*	249.9	265.1
AUGUST*	251.8	264.8
SEPTEMBER*	254.8	267.7
OCTOBER*	253.7	268.2
NOVEMBER*	256.3	271.2
DECEMBER	254.2	269.7

* Levels represent average levels based on weekly readings.

ANNUAL GROUNDWATER LEVEL CHANGE FOR 1992:

Well OB-3: 251.3 ft - 254.2 ft = (-) 2.9 ft = 0.8 m
(Loss)

Well OB-4: 267.4 ft - 269.7 ft = (-) 2.3 ft = 0.70 m
(Loss)

FIGURE 1

ANNUAL AVERAGE GROUND WATER LEVEL

