



PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

July 8, 1994

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

NPDES Permit No. PA0051926

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

Subject: Limerick Generating Station, Units 1 and 2
Changes to National Pollutant Discharge
Elimination System Permit

Gentlemen:

This letter is being submitted, in accordance with the requirements of the Limerick Generating Station (LGS), Units 1 and 2, Environmental Protection Plan (EPP), to inform the NRC that the Pennsylvania Department of Environmental Resources (PA DER) has recently approved two (2) changes to the LGS, Units 1 and 2, National Pollutant Discharge Elimination System (NPDES) Permit No. PA0051926. Section 3.2 of the LGS EPP stipulates that the NRC shall be notified within 30 days following the date of approval of a change to the NPDES permit.

By letter dated June 24, 1994, the PA DER approved PECO Energy Company's request to revise LGS NPDES Permit No. PA0051926 to permit the use of a chemical additive (i.e., Betz Bio-Trol 107) to kill methane producing bacteria in order to facilitate the processing of 1500 gallons of radioactive spent resin and sludge waste material at LGS.

In addition, by letter dated June 27, 1994, the PA DER approved a change to LGS NPDES Permit No. PA0051926 to permit the use of chemical additives Betz 3625, Hydrothol 191, PECO 3, PEC 10, and PEC 12. These chemical additives will be used to control algae growth in the Spray Pond, and for corrosion and deposition control in the secondary cooling water system.

Copies of the PA DER letters approving these changes to the LGS NPDES permit are attached. The NRC was previously notified that PECO Energy requested these changes to the LGS NPDES permit by letters dated March 30, 1994, May 11, 1994, and May 24, 1994.

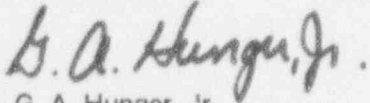
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If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, reading "G. A. Hunger, Jr." in a cursive style.

G. A. Hunger, Jr.
Director - Licensing

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/ attachments)
N. S. Perry, USNRC Senior Resident Inspector, LGS, (w/ attachments)



RECEIVED

COMMONWEALTH OF PENNSYLVANIA JUN 29 1994
DEPARTMENT OF ENVIRONMENTAL RESOURCES R. M. MATTY, JR.

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
June 24, 1994

Southeast Regional Office

(610) 832-6131
FAX: (610) 832-6259

Robert M. Matty, Jr.
Engineer-Environmental Affairs
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699

Re: Industrial Waste
NPDES Permit No. PA0051926
Limerick Generating Station
Limerick Township
Montgomery County

Dear Mr. Matty:

This is in response to your May 24, 1994, letter requesting temporary approval to use Betz biocide BIO-Trol 107 for the treatment of 1500 gallons of radioactive spent resin and sludge waste material to kill methane producing bacteria at the subject facility.

You indicated that two liters of the product will be mixed with 1500 gallons of waste material. After the bacteria kill, the wastewater will be decanted off. This will be neutralized, filtered and demineralized prior to discharge through monitoring point 301, which eventually discharges to Outfall 001. The approval of your request for a one time only discharge of approximately 1500 gallons of treated wastewater is granted, subject to the following conditions:

1. During discharge of the treated wastewater at MP 301, Outfall 001 must be sampled and analyzed for total suspended solids, copper, zinc, oil and grease and pH. The following effluent limitations must be met:

<u>Pollutant</u>	<u>Maximum Daily (mg/l)</u>
Total Suspended Solids	100
Copper, Total	0.28
Zinc, Total	1.4
Oil and Grease	20
pH	6.0 - 9.0 Standards Units at all times



Robert M. Matty, Jr.

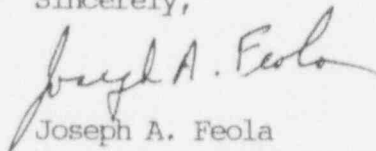
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June 24, 1994

2. All monitoring results must be submitted to the Department within 28 days of completion of the test.
3. Our Operations Section shall be notified 24 hours prior to the discharge.

If you have any questions, please contact Sohan Garg, of our staff, at the above number.

Sincerely,



Joseph A. Feola
Water Management Program Manager

cc: Limerick Township
Mr. O'Neil
Mr. Newbold
Re 30 (TE)167.1

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JUL 05 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

R. M. MATTY, JR.

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
June 27, 1994

Southeast Regional Office

(610) 832-6131

FAX: (610) 832-6259

Robert M. Matty, Jr.
Engineer, Environmental Affairs
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699

Re: WQ/IW/Correspondence
NPDES Permit No. PA0051926
Limerick Generating Station
Limerick Township
Montgomery County

Dear Mr. Matty:

This is in response to your March 30, 1994 and May 11, 1994 letters regarding approval to use Betz 3625, Hydrothol 191, PECO 3, PECO 10, and PECO 12 chemical additives at the subject facility to control algae growth in the spray pond and corrosion & deposition in the cooling water system.

Based on our review of the information submitted, we hereby approve your requests subject to the following conditions.

1. The approved chemical additives with allowable usage rates and effluent limitations are:

USAGE RATES (LBS/DAY)

NAME	AVERAGE MONTHLY	MAXIMUM DAILY
PECO 3	400	800
PECO 10	190	950
PECO 12	2700	5400
Betz 3625	Average effluent concentration of whole product at discharge point 001 shall be limited to 0.2 mg/l	
Hydrothol 191	Average effluent concentration of whole product at discharge point 001 shall be limited to 0.07 mg/l	

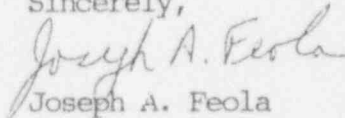
June 27, 1994

2. Accurate usage records (name of additive, quantity added, date added) of approved chemical additives and blowdown discharge volume must be maintained on the Chemical Additive Reporting Form (copy enclosed) and kept on site by the Company.
3. Outfall 001 shall be sampled and analyzed for Betz 3625 on a weekly basis, with daily monitoring during use of the product. Spectrophotometer/calorimeter method shall be used for Betz 3625 with a detection level of 0.052 mg/l. It is our understanding that test methods are available to analyze Betz 3625 and the active ingredients of Hydrothol 191.
4. Outfall 001 shall be sampled and analyzed for the active ingredients of Hydrothol 191 during the use of the product in the spray pond, and during which time the discharge from the spray pond may contain the product. The results obtained shall be used to calculate the concentration of the whole product Hydrothol 191 at Outfall 001. Gas Chromatograph Method shall be used for the analysis of the active ingredients. The calculations demonstrating compliance of the whole product with the effluent limitation of 0.07 mg/l shall be attached to the Discharge Monitoring Report and be submitted to the Department.
5. Chemical additives to control corrosion, scaling, algae, slime, fouling or oxygen, etc., and blowdown discharge rates shall be managed by the Company to ensure that toxic effects in the receiving stream are prevented. Usage rates shall be consistent with the quantities and rates approved and shall be limited to the minimum amount necessary to accomplish the intended purposes of the chemical additive.

The existing NPDES permit will be revised to include this approval upon completion of our review of the pending NPDES permit application.

If you have any questions, please contact Sohan Garg, of our staff.

Sincerely,



Joseph A. Feola
Water Management Program Manager

Enclosure: Chemical Additive Reporting Form

cc: Mr. Newbold
Mr. O'Neil
EPA (3WM51)
Limerick Township
Permits and Compliance
Re 30 (GJC)171.8

