



PECO ENERGY

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July 27, 1994

Robert Bauer, Jr.  
Department of Environmental Resources  
Bureau of Water Quality Management  
Suite 6010, Lee Park  
555 North Lane  
Conshohocken, PA 19428

SUBJECT: Limerick Generating Station, Units 1 and 2  
Noncompliance of NPDES Permit No. PA-0051926,  
Discharge 001 Total Zinc Concentration in  
Excess of Maximum Daily Limitations

Dear Mr. Bauer:

Description of the Event:

On Thursday morning, June 9, 1994, routine chemical analyses were performed on both cooling towers for the purpose of assessing the daily water chemistry. The zinc analyses, which are performed with an administrative non-EPA approved method, indicated total zinc levels above 1.0 mg/l in both cooling towers. Discharge 001 was the sampled and analyzed using an EPA approved method. A result of 1.2 mg/l was obtained, exceeding the daily maximum discharge limit of 1.0 mg/l. Based on additional monitoring using the administrative method, total zinc levels were within limitations by the end of the day. Since good agreement existed between the two analytical methods on that day, and based on the immediate corrective actions taken, we estimate the total duration of noncompliance to be 24 hours.

Immediate Corrective Actions

Upon receipt of the initial analytical results, the chemistry of both cooling towers was adjusted to lower the zinc concentration by reducing the zinc addition rates.

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#### Cause of the Non-Compliance

A review of the cooling tower chemistry trends, and operating conditions for the week of June 6, 1994, to June 10, 1994, did not indicate any system changes that could have caused an increase in zinc levels. In fact, zinc was monitored at Discharge 001 on the previous day, June 8, and the results were well within permit limits. While the usage rates for the zinc based chemical, PECO 4, were relatively elevated, they were within both NPDES permit usage limits and station administrative usage limits. The quality and concentration of zinc in the PECO 4 product has also been verified to be acceptable.

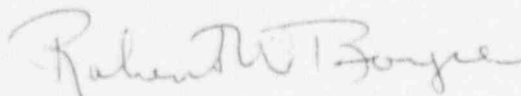
Based on the available information, we believe that the sample taken on June 9, 1994, was not affected by excess suspended solids in the sample line, and was representative of Discharge 001 effluent. At this time, no clear cause for this event can be concluded.

#### Actions to Prevent Recurrence

A multi-discipline task team has been assembled to re-evaluate our current program for controlling the addition, sampling, and analysis of zinc. The conclusions of this team will be reported in an August, 1994 report to the DER. In the interim, our daily zinc control limits will be administratively maintained lower than currently practiced.

If you have any questions please contact Jim Kantner at 327-1200, extension 3400.

Sincerely,



SCD:cah

cc: U.S. Nuclear Regulatory Commission  
Document Control Desk  
Docket Nos. 50-352/353  
Washington, D.C. 20555

T. T. Martin  
Administrator, Region I, USNRC  
Docket Nos. 50-352/353

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N. S. Perry  
USNRC Senior Resident Inspector, LGS  
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