



PECO ENERGY

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

August 11, 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 Section 3.2 of the Limerick Generating Station (LGS), Units 1 and 2, Environmental Protection Plans (EPPs), which stipulate that the NRC shall be notified within 30 days following the date of approval of a change to the National Pollutant Discharge Elimination System (NPDES) permit.

By letter dated August 3, 1994, the Pennsylvania Department of Environmental Resources (PA DER) approved a change to LGS NPDES Permit No. PA0051926 regarding the use of Betz PEC10, a chemical additive recently approved for usage at LGS to control algae growth in the Spray Pond. The PA DER previously approved the use of this chemical additive by letter dated June 27, 1994. However, we subsequently requested that the PA DER amend its approval for the use of this chemical based on effluent limitations for the product's ingredients. The NRC was notified of our request to amend the LGS NPDES permit regarding the use of Betz PEC10 by letter dated July 25, 1994. A copy of the PA DER letter approving this change to the LGS NPDES permit is attached.

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

Very truly yours,

G. A. Hunger, Jr.
Director - Licensing

Attachment

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

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
August 3, 1994

Southeast Regional Office

(610) 832-6130
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 July 25, 1994 letter concerning approval to use chemical additive PEC-10 at the subject facility at a usage rates of 190 lbs/day average monthly and 950 lbs/day as maximum daily. You have requested that the approval be based on effluent limitations for the product's ingredients.

As a result of our review of the information submitted, approval to use chemical additives contained in our previous approval letter of June 27, 1994 is revised subject to the following conditions:

1. The approved chemical additives with allowable usage rate and effluent limitations are as follows:

<u>Usage Rate (lbs/day)</u>		
<u>Name</u>	<u>Average Monthly</u>	<u>Maximum Daily</u>
PEC-03	400	800
PEC-10	Average effluent concentration of zinc at discharge point 001 shall be limited to 0.7mg/l.	
PEC-12	2700	5400
Betz-3625	Average effluent concentration of the whole product at discharge point 001 shall be limited to 0.2 mg/l.	
Hydrothol-191	Average effluent concentration of the whole product at discharge point shall be limited to 0.07 mg/l.	

2. The outfall 001 shall be sampled during PEC-10 use and analyzed for zinc and phosphorus. The results must be reported on the Discharge Monitoring Report (DMR) form and be submitted to the Department.
3. 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.
4. 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.
5. 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 maintained at the site and the results must be reported on the DMRs.
6. 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.

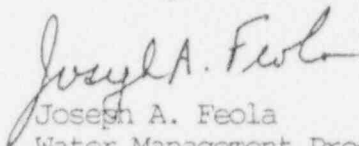
Robert M. Matty, Jr.

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August 3, 1994

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

Outfall _____
 Company Name _____
 Permit No. _____
 Month/Year _____

[illegible]