



ENTERGY

Entergy Operations, Inc.
P.O. Box 8
Kilbuck, LA 70006
Tel: 504 739-6774

R. F. Burski

Director
Nuclear Safety
Waterford 3

W3E3-91-0031

3-A1.01.04

A4.05

QA

April 23, 1991

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford Steam Electric Station - Unit Number 3
Docket Number 50-382
Operating License NPF-38
Annual Environmental Operating Report - 1990

Dear Gentlemen:

Attached is the 1990 Annual Environmental Operating Report for the subject facility. This report is submitted pursuant to Section 5.4.1 of the Environmental Protection Plan (Appendix B to the Operating License).

Should you have any questions regarding this report, please contact M. L. Layton at (504) 739-6236.

Very truly yours,

RFB/ARR/ddd

Attachments

cc:

D. L. Wigginton
R. D. Martin
M. O. Knudson, EPA
M. O'Neill, LDEQ
E. L. Blake
R. B. McGehee
M. S. Reynolds
NRC Resident Inspectors Office

9104260235 910423
PDR ADOCK 05000382
R PDR

1E25

W3E3-91-0031

Annual Environmental Operating Report - 1990

Page 2

April 23, 1991

cc Address:

M. O'Neill, Assistant Secretary
Office of Water Resources
Louisiana Department of Environmental Quality
P.O. Box 44066
Baton Rouge, LA 70804-4091

bcc: (w/Attachment)
M. L. Layton
F. W. Manhart
D. E. Baker
A. R. Roberts
J. R. McGaha
S. S. DiJohn
D. Milliner
Waterford 3 Records Center
Licensing Library

bcc: (w/o Attachment)
R. P. Barkhurst
R. E. Allen
L. W. Laughlin

1990 ANNUAL ENVIRONMENTAL OPERATING REPORT

This report describes implementation of the Environmental Protection Plan (EPP) for the calendar year 1990, and provides the information required by the EPP.

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

This section of the EPP provides protection of the two cultural resource areas on the Waterford 3 site. There were no activities which affected either the Plantation Overseer's House site or the Plantation Quarter's site, both eligible of the National Register of Historic Places, during this reporting period.

B. EPP noncompliances and the corrective actions taken to remedy them:

Louisiana Department of Environmental Quality issued compliance order No. We-C-90-0234 to Entergy Operations, Inc. on November 8, 1990, for failure to meet the effluent limitations specified by LWDPS P1410. Failure to meet the specified limitations occurred on seven different discharges between the period 7/87 - 3/90.

Corrective actions taken to remedy the noncompliances include:

1. Adding bacteria to the treatment facility during periods of under utilization.
2. Discontinuing the use of floor cleaners and wax stripping agents at the Energy Education Center.
3. A weekly maintenance and surveillance program for the sewage treatment facility.
4. The organization of all environmental responsibilities under one department.

No noncompliances have occurred since the implementation of the corrective action.

C. A discussion of changes in station design or operation, tests, or experiments made in accordance with EPP Subsection 3.1 which involved a potentially significant unreviewed environmental question:

There were no changes in station design, tests, or experiments conducted that are reportable under this section during this reporting period. However, a change in the operational responsibilities did occur during this reporting period. This change included the consolidation of responsibilities for environmental affairs under the Radiochemistry/Environmental Manager who reports directly to the Director, Operations Support and Assessments, who in turn reports to the Vice President, Operations. A copy of the reporting chart is provided as Attachment 1.

D. Nonroutine reports submitted in accordance with Subsection 5.4.2:

One nonroutine report was submitted in accordance with Subsection 5.4.2. This report was in response to the noncompliance order described in section B above. A copy of the report is included as Attachment 2.

Waterford 3 Site
Operations
Support & Assessment

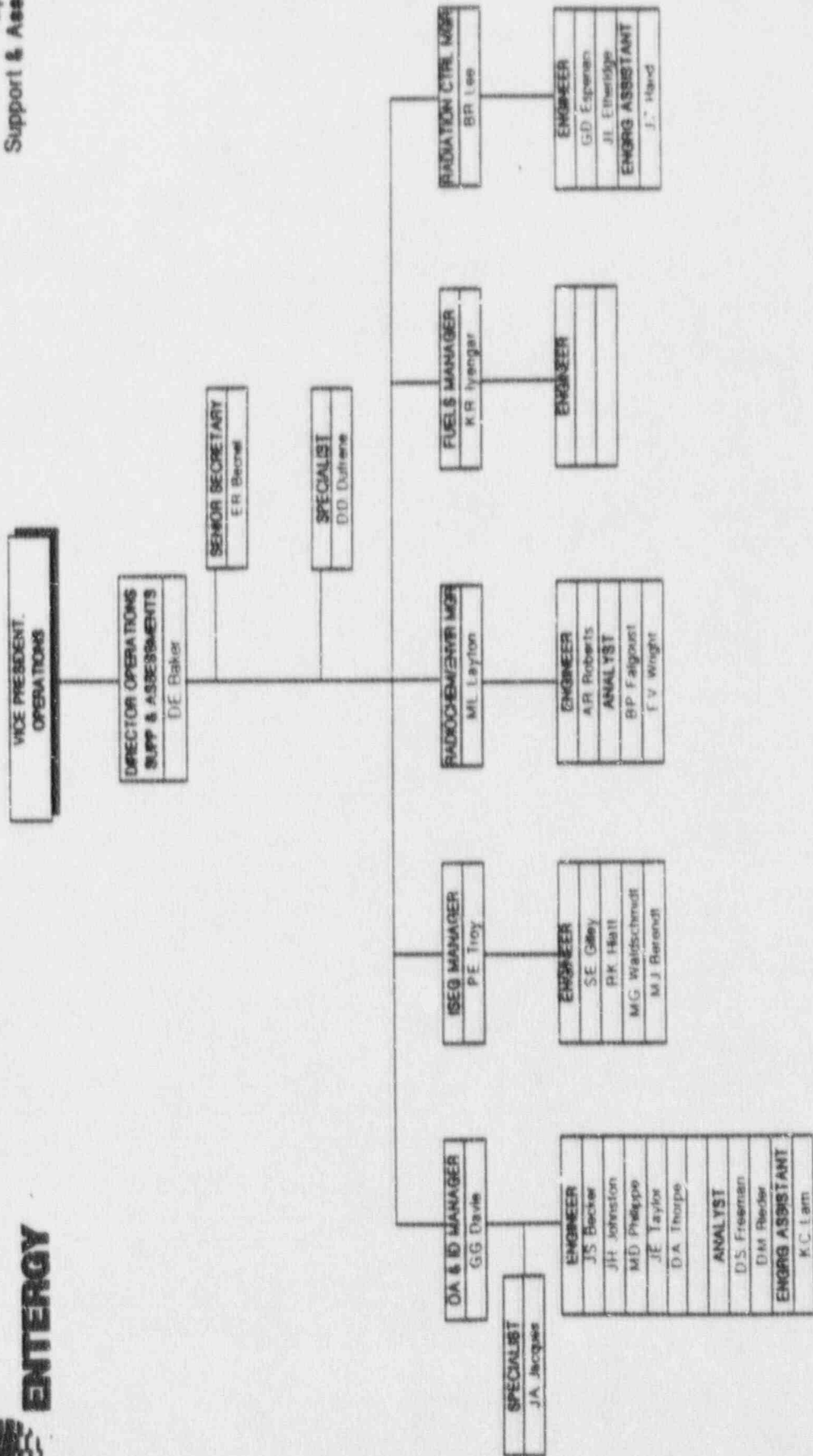
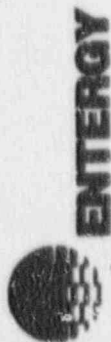


Chart and ST No. 0
Issue Date 04/04/90

Prepared By	Date	Approved By	Date
D.E.B.	10/06/90	R.P.H.	10/06/90



**Entergy
Operations**

Entergy Operations, Inc.
P.O. Box 8
Baton Rouge, LA 70804
Tel 504-739-6650

December 7, 1990

Ms. Cheryl Easley
Water Pollution Control Division
Department of Environmental Quality
P.O. Box 44091, Capitol Station
Baton Rouge, La 70804-4091

Subject: Response to DEQ Compliance Order No. WE-C-90-0234

Dear Ms. Easley:

Attached please find our response to DEQ Compliance Order No. WE-C-90-0234 issued to Entergy Operations as a result of violations of the Environmental Quality Act that occurred at our sewerage treatment facility located on Highway 3127 in Taft, Louisiana.

Should you have any questions or comments, please contact Mr. Michael L. Layton of our Radiochemistry/Environmental Section at (504) 739-6236.

Yours very truly,

D. E. Baker, P.E.
Director
Operations Support and Assessments

DEB/MLL/ddd
Attachment

cc: Mr. M.O. Knudson - EPA Region VI
Water Pollution Control Division - SE Regional Office
Mr. J.L. Blount
Mr. R. LaBauve
Mr. T. Killeen - Office of Water Resources

Response to DEQ Compliance Order No. WE-C-90-0234

Circumstances/Corrective Actions

Pursuant to your order the following is a description of the circumstances of the cited violations and the corrective actions taken:

Cited Violation Date: 7/87 - 9/87.

<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
BOD (Avg)	40 mg/l	30 mg/l
BOD (Max)	67 mg/l	45 mg/l
TSS (Avg)	43 mg/l	30 mg/l
TSS (Max)	62 mg/l	45 mg/l
FC (Avg)	64,000/100 ml	200/100 ml
FC (Max)	99,000/100 ml	400/100 ml

Description of Circumstances: The facility, a small package extended aeration unit, was underutilized in that the average daily flow was less than 1000 gallons per day with the units capacity being 10,000 gallons per day.

Corrective Actions Taken: Bacteria was added to compensate for the lack of flow and additional attention to facility operation and maintenance was undertaken.

These exceedences of WP 1410 were noted on a sample taken July 8, 1987. We became aware of them when telephoned by our laboratory on July 14, 1987. Corrective actions were taken and we notified your office by letter on July 17, 1987. We anticipated compliance at this time and verified this with a sample taken August 8, 1987.

Cited Violation Date: 1/88 - 3/88.

<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
BOD (Avg)	85 mg/l	30 mg/l
BOD (Max)	169 mg/l	45 mg/l
FC (Avg)	39,011/100 ml	200/100 ml
FC (Max)	112,600/100 ml	400/100 ml

Description of Circumstances: We attribute these exceedences to the discharge of floor cleaner to the sanitary waste system. The floor cleaner removed from the treatment system the bacteria necessary for activated sludge treatment. The discharge of floor cleaner into the system occurred shortly after a change in janitorial personnel at the Energy Education Center.

Corrective Actions Taken: The new janitorial staff was informed of the consequences of their action and instructed as to the proper handling of all cleaning materials so as to prevent future recurrences of this incident. Additional organic material was added to maintain the aerobic digestion process and the chlorine dose was increased to reduce the fecal coliform level in the effluent.

We became aware of these exceedences on January 27, 1988 and notified your office by letter on January 29, 1988. This was followed by a progress report to you on February 26, 1988. Our compliance with WP 1410 was verified by a sample taken March 23, 1988.

Cited Violation Date: 7/88 - 9/88.

<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
FC (Avg)	1204/100 ml	200/100 ml
FC (Max)	2400/100 ml	400/100 ml

Description of Circumstances: Due to a reduction in system flow, maintenance personnel had made a corresponding reduction in chlorine treatment.

Corrective Action Taken: As a result of this exceedence, the chlorine dosage was increased to the previous level to insure adequate treatment.

This exceedence was noted on sample taken on July 27, 1988. We became aware of it when telephoned by our laboratory on August 2, 1988. We notified your office by letter on August 8, 1988. Our compliance with WP 1410 was verified by a sample taken on August 6, 1988.

Cited Violation Date: 10/88 - 12/88.

<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
TSS (Avg)	59 mg/l	30 mg/l
TSS (Max)	86 mg/l	45 mg/l

Description of Circumstances: Due to recent suspected operational perturbations, the routine addition of non-sewage organic matter to augment the aerobic process was discontinued.

Corrective Action Taken: The addition of organic matter to augment the aerobic digestion process on a routine basis was reinstituted.

We became aware of this exceedence when our laboratory telephoned us on November 2, 1988. We notified your office by letter on November 7, 1988. This was followed by a progress report on November 14, 1988.

Cited Violation Date: 1/89 - 3/89.

<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
TSS (Avg)	39 mg/l	30 mg/l
TSS (Max)	61 mg/l	45 mg/l

Description of Circumstances: It appeared that there was inadequate solids settling time due to continuous aeration.

Corrective Action Taken: The aerators were placed on a timed cyclic operation and a flocculating agent was added.

We became aware of this exceedence on February 8, 1989. We notified your office by letter on February 13, 1989. Our compliance with WP 1410 was verified by a sample taken on February 21, 1989.

Cited Violation Date: 4/89 - 6/89.

<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
FC (Avg)	10,000/100 ml	200/100 ml
FC (Max)	20,000/100 ml	400/100 ml
BOD (Avg)	36 mg/l	30 mg/l
BOD (Max)	52 mg/l	45 mg/l

Description of Circumstances: We attribute these exceedences to a temporary hydraulic overload caused by construction activities effecting the tie-in of additional service to the sewage treatment facility. Prior to sampling, the tie-in was completed. This activity included flushing the lines and testing the lift station pumps and sanitary facilities which utilized a large volume of water.

Corrective Action Taken: We felt that this was an upset condition and the samples collected were not representative of the usual condition of the effluent.

We became aware of these conditions on April 24, 1989, and notified your office on April 28, 1989. Our compliance with WP 1410 was verified by a sample taken on May 2, 1989.

Cited Violation Date: 1/90 - 3/90.

<u>Parameter</u>	<u>Reported Value</u>	<u>Permit Limit</u>
TSS (Avg)	44 mg/l	30 mg/l

Description of Circumstances: This was due to a system perturbation on January 23, 1990. The resultant TSS was below the daily maximum limit of 45 mg/l.

Corrective Action Taken: We felt that this was an upset condition and was not representative of the usual condition of the effluent. Additional samples on March 10 (24 mg/l), March 17 (19 mg/l) and March 21 (24 mg/l) verified compliance with WP 1410.

We have made a continuous effort to maintain compliance with WP 1410 and will continue to do so. In addition, we have promptly informed your office of any exceedence and any corrective actions that we have taken. It is anticipated that we will continue to do so in the future.

Compliance Maintenance

Our latest samples taken indicate the facility is presently in compliance with the terms and conditions of WP 1410. To further ensure this compliance we have placed the supervision of this unit under the cognizance of our newly formed Radiochemistry/Environmental Section. This will enable us to more closely monitor and control this unit and reduce our reliance on contract personnel in operation of the unit. We are reasonably confident that this enhanced monitoring program will be successful in eliminating further non-compliances. If this cannot be done in a cost effective manner other engineered solutions will be evaluated to ensure that this effluent is disposed of in an acceptable manner.