



**LOUISIANA  
POWER & LIGHT**

142 DELARONDE STREET  
P O BOX 6008 • NEW ORLEANS, LOUISIANA 70174 • (504) 366-2345

L. V. MAURIN  
Vice President Nuclear Operations

May 6, 1983

W3P83-1376  
3-A25.01.02

Director of Nuclear Reactor Regulation  
Attention: Mr. G. W. Knighton, Chief  
Licensing Branch Number 3  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Waterford Steam Electric Station - Unit Number 3  
Docket Number 50-382  
Discharge of Water from Condenser Hotwell During Hot Functional Testing

Dear Mr. Knighton:

Louisiana Power & Light Company (LP&L) specified, both in the Waterford Steam Electric Station - Unit Number 3 (Waterford 3) Environmental Report (Section 3.6.4 and in the response to Question Number 301.4) and National Pollutant Discharge Elimination System (NPDES) permit application that condenser hotwell water, among other waste streams, would be treated in the Waterford Steam Electric Station - Units 1 and 2 (Waterford 1 and 2) waste treatment ponds to discharge through Waterford 1 and 2 outfall number 001.

March 17-19, 1983, approximately 200,000 gallons of condenser hotwell water were released from Waterford 3's NPDES outfall number 002, rather than as described above. During Hot Functional Testing it became necessary to drain the secondary system, but both the Waterford 1 and 2 waste treatment ponds and the Waterford 3 waste holding pond were full. Since a serious delay in the testing schedule would have resulted had the water been processed through the Waterford 1 and 2 waste treatment system, alternate methods for handling this wastewater were evaluated. As the water was of a very high quality, met all the effluent limitations for low volume and metal cleaning waste discharges, and outfall 002 is permitted for discharge of miscellaneous low volume wastes and "abnormal liquid discharges", it was decided to release the condenser hotwell through this outfall.

On April 5, 1983, Roy W. Prados and Chadi D. Groome of our Nuclear Licensing Subgroup telephoned the Environmental Protection Agency (EPA) - Region VI to explain Louisiana Power & Light Company's (LP&L) rationale for this discharge, and to obtain their concurrence that future similar discharges could be made in this manner. They returned our call on April 6, 1983 to apprise us that similar discharges could be made as proposed. We agreed to prepare a letter to this effect, and notify the EPA in advance of future discharges. Telephone calls were also placed to Charles W. Billups of the NRC's Environmental Engineering Branch to

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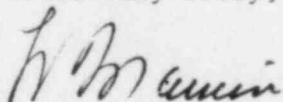
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explain the situation in light of LP&L's Environmental Report commitments, and to relate EPA's concurrence with our rationale and proposed actions.

At the time that LP&L applied for its NPDES permit for Waterford 3, we were not aware that the quality of some of the preoperational and operational wastewaters would be so high, so we specified that all preoperational and operational wastewaters would be treated and discharged through the facilities at Waterford 1 and 2. Now that the initial system flushes have been completed, and operational quality water is circulating through the plant, we find that this water, even when out of specification for operating purposes, is still of very high quality, well within any effluent limitations. LP&L is currently reviewing its philosophy regarding such discharges (the condensers will have to be emptied during each shutdown period), and may request a modification of its NPDES permit for Waterford 3 to reflect changes in this philosophy.

A copy of LP&L's letter to the EPA, which describes the details of this release is attached. Should you wish to discuss this matter further, please contact Mr. Prados at (504) 363-8773 or Ms. Groome at (504) 363-8956.

Yours very truly,



L. V. Maurin

LVM/CDG/ssd

Attachment

cc: W. M. Stevenson, E. L. Blake, J. H. Wilson (NRC)



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L. V. MAURIN  
Vice President Nuclear Operations

May 6, 1983

W3P83-1337  
3-A25.01.02

Mr. Myron O. Knudson, P.E.  
Director, Water Management Division  
Environmental Protection Agency  
Region VI  
First International Building  
1201 Elm Street  
Dallas, Texas 75270

SUBJECT: Waterford Steam Electric Station - Unit Number 3  
NPDES Permit No. LA0007374

Dear Mr. Knudson:

March 17-19, 1983, approximately 200,000 gallons of condenser hotwell water were released from NPDES outfall number 002, rather than processing the water through the Waterford Steam Electric Station - Units 1 and 2 (Waterford 1 and 2) waste treatment ponds, as specified in the Waterford Steam Electric Station - Unit Number 3 (Waterford 3) permit application (Table 2 of permit application). This water was very high purity demineralized water for circulation in the secondary side of the steam supply system, contaminated with a small quantity of iron (rust) and other suspended solids. The plant was then and is currently in the testing stages prior to fuel load. This water was generated for Hot Functional Testing, and was a preoperational process water.

Certain operational parameters necessitated evacuation of the secondary system. Both the Waterford 1 and 2 waste treatment ponds and the Waterford 3 waste holding pond were full, and release via this pathway would have forced a serious delay in the testing schedule. As this water was of the quality described above; a confirming analysis for pertinent parameters was performed (see Table 1); and outfall number 002 is permitted to handle "abnormal liquid discharges" and miscellaneous low volume wastes (see permit application), it was determined that although specified in the Waterford 3 NPDES permit application that this type of wastewater would be discharged via treatment in the Waterford 1 and 2 waste treatment system, this discharge would instead be made through outfall number 002. It is important to note that this water met the effluent guidelines for release from metal cleaning and low volume waste treatment systems without ever having been treated, so could have been released directly from Waterford 1 and 2 outfall number 001, bypassing the waste treatment system (40CFR122.60(g)(2)), had appropriate piping been available. This release through outfall number 002 was merely a rerouting which facilitated the discharge process.

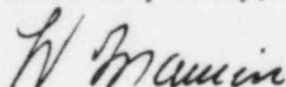
On April 5, 1983, Roy W. Prados and Chadi D. Groome of our Nuclear Licensing Subgroup telephoned Fred Humpke and Alicia Diaz of your office to explain Louisiana Power & Light Company's (LP&L) rationale for this discharge, and to obtain the EPA's concurrence that future similar discharges could be made in this manner. Ms. Diaz returned our call on April 6, 1983 to apprise us that similar discharges could be made as proposed. We agreed to prepare a letter to this effect, and notify your office in advance of future discharges.

At the time that LP&L applied for its NPDES permit for Waterford 3, we were not aware that the quality of some of the preoperational and operational wastewaters would be so high, so we specified that all preoperational and operational wastewaters would be treated and discharged through the facilities at Waterford 1 and 2. Now that the initial system flushes have been completed, and operational quality water is circulating through the plant, we find that this water, even when out of specification for operating purposes, is still of very high quality, well within any effluent limitations. LP&L is currently reviewing its philosophy regarding such discharges (the condensers will have to be emptied during each shutdown period), and may request a modification of its NPDES permit for Waterford 3 to reflect changes in this philosophy.

In addition to the standard copy to the State of Louisiana Department of Natural Resources, a copy of this letter is being forwarded to the Nuclear Regulatory Commission for their cognizance.

Should you wish to discuss this matter further, please contact Mr. Prados at (504) 363-8773 or Ms. Groome at (504) 363-8956.

Yours very truly,



L. V. Maurin

LVM/CDG/ssd

Attachment

cc: J. Dale Givens - LA DNR

Table 1

Condenser Hotwell Analysis

pH	8.6 - 8.8
TSS	8.6 ppm
Total Iron	<1.0 ppm
Total Copper	<1.0 ppm
Dissolved Oxygen	4 - 5 ppm