



Public Service®

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Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

October 19, 1994
Fort St. Vrain
P-94090

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

Attention: Mr. John H. Austin, Chief
Decommissioning and Regulatory
Issues Branch

Docket No. 50-267

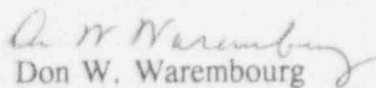
SUBJECT: NPDES Permit Non-Compliance Reports

Dear Mr. Austin:

Attached for your information are three recent non-compliance reports related to the Fort St. Vrain (FSV) National Pollutant Discharge Elimination System (NPDES) Permit. This information is provided in accordance with the FSV Non-Radiological Technical Specifications, Section 3.2.a of Appendix B to Facility Operating License No. DPR-34.

If you have any questions regarding this information, please contact Mr. M. H. Holmes at (303) 620-1701.

Sincerely,


Don W. Warembourg
Decommissioning Program Director

DWW/SWC

Attachment

cc: Regional Administrator, Region IV

Mr. Robert M. Quillin, Director
Radiation Control Division
Colorado Department of Health

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Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

DPT-94-0464
October 7, 1994

Ms. Kathleen L. Kalamen
Industrial Enforcement Engineer
Permits and Enforcement Section
Water Quality Control Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

RE: Public Service Company of Colorado (PSC) Fort St. Vrain Station CDPS
Permit No. CO-0001121

Dear Kathy:

Attached please find a non-compliance report for the PSC Fort St. Vrain Station. The non-compliance report details the maximum pH exceedance reported to you on October 5, 1994.

If you have any questions regarding this report, please feel free to contact me at 294-2814.

Sincerely,

Louise C. Meyerkord
Unit Manager
Environmental Programs

Attachments

cc: U.S. EPA, Region VIII
Steve Miller
Don Warembourg
Dave Fetterolf
Ted Borst
Terry Staley
Jesse Brungardt
Glen Reigel

NPDES DISCHARGE PERMIT NONCOMPLIANCE REPORTING FORM

Date: 10/07/94

Applicable Permit No.: CO-0001121

Discharge No.: 001A

I. GENERAL

Company: Public Service Company of Colorado

Mailing Address: P.O. Box 840 Denver, CO 80201

Plant Name: Fort St. Vrain Station

Plant Location: Near Platteville, Colorado

County: Weld

II. NONCOMPLIANCE REPORT

A. Description and Cause of Noncompliance: A sample collected at discharge point 001A at 2:00 pm on 10/4/94 exhibited a pH of 9.40 s.u. The cause of this elevated pH is biological (photoplankton) activity in the farm pond. Water discharged into the pond from the Goosequill Ditch has a pH less than 9.0 s.u.

B. Noncompliance Period:

Started:	<u>A.M.</u>	<u>2:00</u>	<u>P.M.</u>	<u>10/4/94</u>	<u>Date</u>
Ended:	<u>A.M.</u>		<u>P.M.</u>		<u>Date</u>

C. Action Taken to Reduce, Eliminate, Prevent: A year-long study was implemented on May 1993 to determine the causes of high pH in the 001A outfall from the farm pond. This study was completed on 9/30/94 and submitted to the CWQCD. The conclusion of the study was that elevation of pH across the farm pond was related to biological (photoplankton) activity. A permit amendment will be drafted for public notice in November 1994, which will delete the pH limitations for outfall 001A. (See attached 9/30/94 letter from Don Holmer, CWQCD)

D. Person Initiating Report: Louise Meyerkord

Signature: *Louise Meyerkord*

E. Water Quality Control Division Notification Requirements:

Telephone (24 hrs.):	<u>10/5/94</u>	Date	<u>Ms. Kathleen Kalamen</u>	<u>Notified 1:07 pm</u>
Written (5 days):	<u>10/7/94</u>	Date		<u>Notified</u>

SUBMIT REPORT TO:

Ms. Pat Nelson
Colorado Department of Health
Water Quality Control Division
Monitoring & Enforcement Section
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Regional Administrator
U.S. EPA
One Denver Place, Suite 500
999 18th Street XWM-C
Denver, CO 80202-2405
Attn.: Enforcement - Permit Program

In the event of non-compliance for the FSV Station, a verbal report must be made to the Nuclear Regulatory Commission by the FSV shift supervisor (620-1090) within four hours after verbally notifying the Water Quality Control Division. Contacted the FSV shift supervisor (Shaler) at 1:09 p.m. on 10/5/94

STATE OF COLORADO

Roy Romer, Governor
Patricia A. Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80222-1530
Phone (303) 692-2000

Laboratory Building
4210 E. 11th Avenue
Denver, Colorado 80220-3716
(303) 691-4700



Colorado Department
of Public Health
and Environment

September 30, 1994

Louise Meyerkord, Unit Manager, Environmental Programs,
Public Service Company of Colorado
P.O. Box 840
(1225 17th Street, Suite 2000)
Denver, CO 80201

Subject: Public Service Company of Colorado (PSC) Fort St. Vrain Station,
Discharge Permit CO-0001121, Weld County, Colorado.

Dear Louise:

This letter is a verification of our telephone conversation yesterday (September 29, 1994) with respect to the Division's determination regarding future pH limitations for outfall 001A from the Farm Pond outlet to the South Platte River, which is part of the PSC Fort St. Vrain Station Discharge Permit CO-0001121. The Division has determined at this time that a permit amendment will be drafted for the next public notice (November 1994) which will be deleting the pH limitations for outfall 001A. This decision is based upon the one year study by PSC of the conditions in the Farm Pond, outfall 001A, and outfall 001B. This report has shown that the elevated pH levels from the Farm Pond (001A) are due to algae and to the presence of nutrients in the pond throughout the year; however, there has been compliance within the range of the pH limits for outfall 001B which is prior to the inlet of the Farm Pond. The Division's decision is also based upon a consideration of the previously specified limits for outfall 001A (which has included total residual chlorine limits, temperature limits, and flow reporting) in the last three renewal permits, which did not include pH limitations at 001A.

Thus, at this time, the Division will use enforcement discretion for any violations of the pH limitation range of 6.5 to 9.0 s.u. for outfall 001A, since these limits will be deleted. Although these particular pH limits were specified as applicable beginning on October 1, 1994 on page 1c(1) of the permit, these limits are also subject to the ** footnote, which states: "These pH limitations will be further reevaluated and modified, based upon the analytical results of the one-year study and other possible considerations." Thus, this letter and the next amendment address the decision that there will be no pH limits for the 001A discharge point.

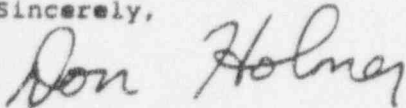
For the time being, Public Service Company should continue monitoring for pH at outfall 001A. Requirements for future pH monitoring at outfall 001A will be discussed in the upcoming permit amendment.

Received
Environmental Services
Date 10/6/94

Louise Meyerkord, Unit Manager, Environmental Programs,
Public Service Company of Colorado - Ft. St. Vrain Station
September 30, 1994 Page 2

If you have any concerns or questions regarding this letter, please contact me
at (303)+692-3601.

Sincerely,



Don A. Holmer
Industrial Permits Engineer
Permits and Enforcement Section
WATER QUALITY CONTROL DIVISION

cc: Kathleen Kalamen, Industrial Permits and Enforcement Unit, WQCD
Victor Sains, Field Support Section, WQCD
Weld County Health Department
Permits Section, Environmental Protection Agency



Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

October 10, 1994

Ms. Kathleen L. Kalamen
Industrial Enforcement Engineer
Permits and Enforcement Section
Water Quality Control Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

RE: Public Service Company of Colorado (PSC) Fort St. Vrain Station CDPS Permit
No. CO-0001121

Dear Kathy:

Attached please find a non-compliance report for the PSC Fort St. Vrain Station. The non-compliance report details the boron exceedance reported to you on October 10, 1994.

If you have any questions regarding this report, please feel free to contact me at 294-2814.

Sincerely,

Louise C. Meyerkord
Unit Manager
Environmental Programs

Attachment

cc: U.S. EPA, Region VIII
Steve Miller
Don Warembourg
Terry Staley
Dave Fetterolf
Jesse Brungardt
Mike Holmes
Ted Borst
Glen Reigel

NPDES DISCHARGE PERMIT NONCOMPLIANCE REPORTING FORM

Date: 10/10/94

Applicable Permit No.: CO-0001121

Discharge No.: 001B

I. GENERAL

Company: Public Service Company of Colorado

Mailing Address: P.O. Box 840 Denver, CO 80201

Plant Name: Fort St. Vrain Station

Plant Location: Near Platteville, Colorado

County: Weld

II. NONCOMPLIANCE REPORT

A. Description and Cause of Noncompliance: A sample collected at discharge point 001B at 8:45 am on 10/9/94 exhibited a boron concentration of 0.813 mg/l, which slightly exceeds the 0.75 mg/l boron limitation established in my 8/26/94 letter to Don Holmer. (Copy is attached.) The boron concentration at 9:00 am on 10/8/94 (the first day of this PCR/V shield water release) was 0.449 mg/l, thus allowing for higher discharge rates. Apparently, the higher discharge rate caused exceedance of the limit. The release was complete by the time the 0.813 mg/l boron analytical result was received.

B. Noncompliance Period:

Started:	<u>8:45 A.M.</u>	<u>P.M.</u>	<u>10/9/94</u>	<u>Date</u>
Ended:	<u>10:20 A.M.</u>	<u>P.M.</u>	<u>10/9/94</u>	<u>Date</u>

C. Action Taken to Reduce, Eliminate, Prevent: The discharge was complete prior to receipt of the 10/9/94 boron analytical result. More conservative margins will be utilized in future PCR/V shield water releases.

D. Person Initiating Report: Louise Meyerkord

Signature: *Louise Meyerkord*

E. Water Quality Control Division Notification Requirements:

Telephone (24 hrs.):	<u>10/10/94 Date</u>	<u>Ms. Kathleen Kalamen</u>	<u>Notified 8:30 am</u>
Written (5 days):	<u>10/10/94 Date</u>		<u>Notified</u>

SUBMIT REPORT TO:

Ms. Kathleen Kalamen
Colorado Department of Health
Water Quality Control Division
Monitoring & Enforcement Section
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Regional Administrator
U.S. EPA
One Denver Place, Suite 500
999 18th Street 8WM-C
Denver, CO 80202-2405
Attn.: Enforcement - Permit Program

In the event of non-compliance for the FSV Station, a verbal report must be made to the Nuclear Regulatory Commission by the FSV shift supervisor (620-1090) within four hours after verbally notifying the Water Quality Control Division. Contacted the FSV shift supervisor at 8:33 a.m. on 10/10/94.



Public Service

Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

August 26, 1994

Mr. Don Holmer
Industrial Permits Engineer
Permits and Enforcement Section
Water Quality Control Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

RE: Public Service Company of Colorado - Fort St. Vrain Station Permit #CO-0001121

Dear Don:

As we discussed, the Public Service Company of Colorado (PSC) Fort St. Vrain Station (FSV) will be discharging the first 38,000 gallons of shield water from the prestressed concrete reactor vessel (PCRV) through a filtering/demineralizer system and subsequently to the South Platte River via the Goosequill Ditch during the week of August 29, 1994. This discharge will be made in accordance with conditions of the FSV wastewater discharge permit and the Tritium Discharge Understanding between Public Service Company of Colorado and the Colorado Water Quality Control Division ("Tritium Understanding"), as developed in August and September 1992.

Due to the fact that tritium levels in the PCRV shield water have been much lower than predicted, very little PCRV shield water has been released to date. Accordingly, there has been an accumulation of sodium nitrite, sodium nitrate (due to the conversion of most of the nitrite in the PCRV shield water to nitrate), and sodium tetraborate; the source of these parameters is from the approved use of Calgon products as coagulant aids in the PCRV shield water. Such materials would have been released over the last year if a "feed and bleed" program had been necessary due to higher tritium concentrations being encountered.

Therefore, as we agreed, to comply with water quality standards for Segment 1 of the Middle South Platte River, FSV will utilize purposeful control of release rates of the PCRV shield water to the Goosequill Ditch, along with waters required to comply with 10 CFR 20 limits for radioactive releases. FSV will ensure that the waters discharged from the Goosequill Ditch to the South Platte River comply with all existing wastewater discharge limitations, as well as the following limitations:

- 1) 0.68 mg/l nitrite (as agreed in the "Tritium Understanding");
- 2) 10 mg/l nitrate (water quality standard for the receiving segment); and
- 3) 0.75 mg/l boron (water quality standard for the receiving segment and agricultural standard)

The potential for increased levels of nitrates entering the farm pond from the Goosequill Ditch is not expected to have a significant effect on the pH at the farm pond due to the short duration of the PCRV shield water releases.

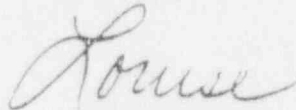
The PCRV shield water will be drained from the PCRV through demineralizers to a bladder in the Reactor Building sump, then drained from the bladder to the sump pump, which will discharge it by mixing it with the 10 CFR 20 required blowdown flow. Analysis of the bladder contents for radioactivity levels, as well as nitrite, nitrate, and boron concentrations will be performed prior to release from the bladder. Release rates to the Goosequill Ditch will be calculated to ensure compliance with the wastewater discharge permit conditions and the aforementioned nitrite, nitrate, boron, and radioactivity limits.

FSV will further ensure that such limitations are met by conducting daily sampling for these parameters at the Goosequill Ditch (outfall 001B) during the days when a release is made. Due to consistency of the water quality of this water, it is believed that this frequency will accurately reflect the concentrations of these parameters in the released water. Results of the monitoring of the nitrite, nitrate, and boron will be submitted to the CWQCD upon receipt.

It is anticipated that each 38,000 gallon release will take place in approximately a 24 hour period with at least one week between releases. Three 38,000 gallon releases and one 21,000 gallon release will be conducted in the upcoming six weeks. The next major drain of 175,000 gallons is expected to be made in February to April 1995. Draining of the remaining 40,000 gallons of PCRV shield water will be conducted as necessary to support the decommissioning program.

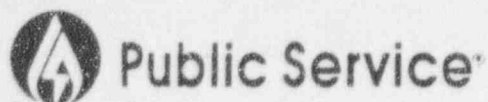
Thank you for your cooperation in this matter. If you have any questions or concerns regarding this information, please call me at 294-2814.

Sincerely,



Louise C. Meyerkord
Unit Manager
Environmental Programs

cc: A. C. Crawford D. Warembourg
D. Fetterolf G. Vonesh
J. Brungardt T. Staley
M. Niehoff G. Reigel
T. Borst B. Woodard



Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

October 12, 1994

Ms. Kathy Kalamen
Industrial Enforcement Engineer
Permits and Enforcement Section
Water Quality Control Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

RE: Public Service Company of Colorado - Fort St. Vrain Station CDPS Permit No.
CO-0001121

Dear Kathy:

Enclosed please find a non-compliance report for the Public Service Company of Colorado Fort St. Vrain (FSV) Station. The non-compliance report details the pH exceedances reported to you on October 12, 1994.

If you have any questions regarding this report, please feel free to contact me at 294-2814.

Sincerely,

Louise C. Meyerkord
Unit Manager
Environmental Programs

Attachment

cc: U.S.EPA, Region VIII
Don Holmer
Don Warembourg
Dave Fetterolf
Ted Borst

Steve Miller
Glen Reigel
Mike Holmes
Terry Staley
Jesse Brungardt

NPDES DISCHARGE PERMIT NONCOMPLIANCE REPORTING FORM

Date: 10/12/94

Applicable Permit No.: CO-0001121

Discharge No.: 001A

I. GENERAL

Company: Public Service Company of Colorado

Mailing Address: P.O. Box 840 Denver, CO 80201

Plant Name: Fort St. Vrain Station

Plant Location: Near Platteville, Colorado

County: Weld

II. NONCOMPLIANCE REPORT

A. Description and Cause of Noncompliance: A sample collected at discharge point 001A at 1:00 pm on 10/12/94 exhibited a pH of 9.34 s.u. The cause of this elevated pH is biological (photoplankton) activity in the farm pond. Water discharged into the pond from the Goosequill Ditch has a pH less than 9.0 s.u.

B. Noncompliance Period:

Started: _____ A.M. 1:00 P.M. 10/12/94 Date _____

Ended: _____ A.M. _____ P.M. _____ Date _____

C. Action Taken to Reduce, Eliminate, Prevent: A year-long study was implemented on May 1993 to determine the causes of high pH in the 001A outfall from the farm pond. This study was completed on 9/30/94 and submitted to the CWQCD. The conclusion of the study was that elevation of pH across the farm pond was related to biological (photoplankton) activity. A permit amendment will be drafted for public notice in November 1994, which will delete the pH limitations for outfall 001A.

D. Person Initiating Report: Louise Meyerkord

Signature: *Louise Meyerkord*

E. Water Quality Control Division Notification Requirements:

Telephone (24 hrs.): 10/12/94 Date Ms. Kathleen Kalamen Notified 2:30 pm

Written (5 days): 10/12/94 Date _____ Notified _____

SUBMIT REPORT TO:

Ms. Kathleen Kalamen
Colorado Department of Public Health and Environment
Water Quality Control Division
Monitoring & Enforcement Section
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Regional Administrator
U.S. EPA
1515 Denver Place, Suite 500
999 18th Street 8WM-C
Denver, CO 80202-2405
Attn.: Enforcement - Permit Program

In the event of non-compliance for the FSV Station, a verbal report must be made to the Nuclear Regulatory Commission