PECO ENERGY

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February 2, 1995

Mr. Sohan Garg
Department of Environmental Resources
Bureau of Water Quality Management
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

Dear Mr. Garg:

Subject: Limerick Generating Station NPDES Permit No. PA0051926

As per our telephone conversation, we are requesting that the subject permit be amended to reflect the following changes:

1) Outfalls 003, 005, and 023 are currently required to have flow measured when discharging cooling tower water. We are requesting that this requirement be changed to an estimate as defined in Part A of the permit. Due to the remote location of the outfalls, installation of flow monitoring equipment is not practical. In addition, the number of occurrences where cooling tower water is discharged through the subject outfalls is minimal. Therefore, we feel that an estimate of the flow is appropriate.

2) Monitoring Point 201, Holding Pond Discharge, is currently required to have flow measured. We are requesting that this requirement also be changed to an estimate. Based on the design capacity of the pond, monitoring of the pond level, and monitoring of the duration of the discharge from the pond, the flow rate can be reliably estimated as per the definition in Part A of the permit. Therefore, based on this information, we feel that an estimate of the flow is appropriate.

3) Attached is a proposed revised Net TSS Worksheet. Step 1 of the worksheet requires that a grab sample from the Schuylkill River be taken on four (4) consecutive days. Presently, station operating procedures require that each of the subject grab samples be analyzed for silica. We are requesting that the worksheet be amended to allow for the average of the four silica values be used in determining the concentration factor in Step 6 (versus requiring the composite of the four (40 samples be analyzed for silica). The proposed change will have no significant effect

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on the concentration factor calculation and will help improve efficiency at the station by eliminating redundant analyses.

A copy of this letter (including any attachments or enclosures) is being sent to the U.S. Nuclear Regulatory Commission (USNRC) in accordance with the Limerick Generating Station, Units 1 and 2, Environmental Protection Plan, Section 3.2, which stipulates that USNRC shall receive a copy of any proposed changes to the NPDES permit at the same time that the permitting agency is notified.

If you have any questions or require additional information, please contact me at (215) 841-5177.

Sincerely,

Robert M. Matty, Jr.
Engineer
Environmental Affairs

Attachment

cc: U.S. Nuclear Regulatory Commission, Document Control Desk
(Docket Nos. 50-352 and 50-353 & License Nos. NPF-39 and NPF-85)
T. T. Martin, Administrator, USNRC, Region 1
N. S. Perry, USNRC Senior Resident Inspector, LGS

DETERMINATION OF NET TSS WORKSHEET

1. Obtain a grab sample from Schuylkill River on four (4) consecutive days and composite.

2. On third day, initiate 24-hour composite sampling of Outfall 001.

3. On fourth day, retrieve 001 composite sample.

4. Determine the average Schuylkill River silica value for the four (4) day composite period.

   _____ mg/l

5. Analyze 001 composite for silica.

   _____ mg/l

6. Determine concentration factor:

   $\frac{\text{001 Silica}}{\text{River Silica}} = $ _____

7. Analyze River composite for TSS.

   _____ mg/l

8. Determine background TSS.

   (River composite TSS) x (Concentration factor) = _____ mg/l

9. Analyze 001 composite for TSS.

   _____ mg/l

10. Determine Net TSS.

    001 Composite TSS - Background TSS = _____ mg/l

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