

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



VIRGINIA POWER

August 21, 1995

Janardan R. Pandey  
Valley Regional Office  
Department of Environmental Quality  
P. O. Box 268  
Bridgewater, VA 22812

**Re: North Anna Power Station - VPDES Permit No. VA0052451  
Change in Discharge or Management of Pollutants**

Dear Dr. Pandey:

As Daniel James of my staff has discussed with you, this is to notify you of a minor change in discharge or management of pollutants at North Anna Power Station. These changes involve the use of two new discharge piping routes identified in our current permit application as Steam Generator Blowdown, Units 1 and 2, and subsequently are designated in the draft permit as Outfalls 112 and 113.

Steam generators were recently replaced at the station and improvements were made in the ancillary systems, that include steam generator blowdown, to improve the life of the steam generators. The upgrades will result in an increase in flow rates from the blowdowns and require that they be rerouted from the clarifier discharge (currently Outfall 003) to separate discharges. It was earlier anticipated that the changes would occur after the reissuance of the VPDES permit but the upgrades will be completed ahead of schedule and it will be necessary to implement operation of the new discharge routings on or about September 1, 1995.

In evaluation of the changes with respect to the requirements of Part III of the current VPDES permit, we note the following issues:

- Notification of the changes were made via the application for reissuance of the VPDES permit that is currently in process. The new discharge routes are reflected in the draft permit.

- The discharges are internal to the main station discharge to state waters and enter the cooling water flow in the same vicinity as the current internal outfall through

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which the blowdowns have previously discharged. Subsequent discharge to state waters will be via the same outfall as authorized in the current permit.

· No new pollutants will be introduced, either internally or at the ultimate discharge to state waters. No significant increases in either concentrations or volumes of contaminants previously identified will be involved.

· There will be no substantial change in volume or character of pollutants being introduced. The changes will constitute only minor alterations in internal management of flow routes and an insignificant level of increase in flow rate.

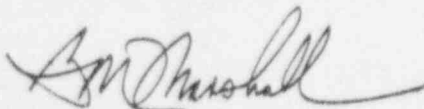
· No activities associated with these changes are expected to occur that will result in any discharge of any toxic pollutant, either limited by the permit or not.

In consideration of the above issues in interpretation of the requirements of Part III of the current permit, it would appear that the implementation of the imminent change in discharge or management of pollutants should be acceptable without modification of the current permit or other formal action. Your concurrence to clarify the issue would be appreciated.

Further, the new discharge outfall designations, as indicated in the current draft permit, are anticipated to be included in the reissued permit. To allay any concerns over the discharges until the reissuance of the permit, we propose to limit and monitor the Steam Generator Blowdown discharges in accordance with the draft requirements and report those data with the station's routine DMR submittals.

Should you desire additional information or have any questions, please contact Daniel James at (804)273-2996.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. M. Marshall".

B. M. Marshall, P.E.  
Manager  
Water Quality

DLJ/mhs

cc: U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., NW  
Suite 2900  
Atlanta, GA 30323  
Re: North Anna Units 1 & 2  
Docket Nos. 50-338/50-339  
License Nos. NPF-4/NPF-7

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555  
Re: North Anna Units 1 & 2  
Docket Nos. 50-338/50-339  
License Nos. NPF-4/NPF-7

Mr. R. D. McWhorter  
NRC Senior Resident Inspector  
North Anna Power Station