

# PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

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J. DOERING, JR.  
PLANT MANAGER  
LIMERICK GENERATING STATION

June 26, 1992

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

Subject: Limerick Generating Station;  
Noncompliance with NPDES Permit No. PA-0051926; Sewage  
Line Cleanout Leak Seeping into Possum Hollow Creek

Dear Mr. Bauer:

## DESCRIPTION OF THE EVENT

On May 4, 1992, at 1000 hours during a routine walkdown of the sanitary sewer system by the facilities engineer, a crack was discovered on an above ground cleanout for the sewage line leading from the Limerick Training Center to the Limerick Generating Station (LGS) sewage system holding tanks. A mist of sewage was spraying from the crack onto the ground in a circular pattern of approximately 5 feet in diameter, within 5 feet of the Possum Hollow Creek. Site Chemistry personnel were then notified of the condition and performed sampling upstream and downstream of the leaking cleanout to determine whether sewage had entered the creek. Fecal coliform analysis results indicated that sewage was seeping through the soil and surface rock and entering Possum Hollow Creek. Analysis of the samples indicated that the fecal coliform concentration decreased to below the background level in the creek at approximately 250 feet downstream of the leaking cleanout prior to reaching the Schuylkill River. This event was a non-compliance of the LGS NPDES permit which exceeded effluent limitations specified in the permit and did not endanger health or the environment.

The leak was stopped on May 4, 1992, and additional samples were taken on May 7, 1992, after it had rained. These results indicated that fecal coliform concentration had decreased to less than the background at 10 feet downstream of the cleanout.

## DURATION OF THE NONCOMPLIANCE

Since the crack in the above ground cleanout was discovered during a sanitary sewer system walkdown, and no prior system walkdowns had been performed, the date that the discharge started could not be determined. Therefore, the total seepage into the creek and the

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duration of the noncompliance could not be determined. The sewage line leading from the Limerick Training Center to LGS was installed in November, 1991. It is believed that the crack occurred during the past winter freezing cycle, possibly in February, 1992. However, due to the small ground area which was affected by the spray, the low flow from the crack in the cleanout, and the short stretch of the creek affected, the overall effect on the environment was minimal.

#### CAUSE OF THE NONCOMPLIANCE

The cause of the noncompliance was a cracked above ground cleanout resulting from a failure to consider the environment in which the cleanout pipe was installed during design of the system. A portion of the cleanout line at the low point of the sewage piping from the Training Center was installed above ground level without the use of heat trace. This resulted in expansion of the sewage filled line during the winter months, resulting in a cracked pipe, allowing sewage under pressure to spray out.

#### CORRECTIVE ACTION

The leak was stopped by 1400 hours on May 4, 1992, by the installation of packing gland material and clamps.

#### PREVENTION OF FUTURE OCCURRENCES

The following actions were implemented to prevent the recurrence of a similar event.

1. The above ground cleanouts at the location of the leak and at an additional location about 100 feet south of the leak were re-located below the frost-line.
2. A thorough walkdown of the sewage system was performed to verify that there were no similar problems in other locations. No additional problems were identified.

Sincerely,

*L. A. Dolphin for JD*

KOS:can

cc: U.S. Nuclear Regulatory Commission  
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Docket Nos. 50-352/50-353  
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Administrator, Region I, USNRC  
Docket Nos. 50-352/50-353

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USNRC Senior Resident Inspector, LGS  
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