

**LOUISIANA**  
POWER & LIGHT

WATERFORD 3 SES • P.O. BOX 8 • KILLONA, LA 70066

February 12, 1985

W3P85-0364  
3-A25.01.02  
A4.10

Mr. Myron O. Knudson, P.E.  
Director, Water Management Division  
Environmental Protection Agency  
Region IV  
First International Building  
1201 Elm Street  
Dallas, Texas 75720

SUBJECT: Waterford Steam Electric Station  
Unit Number 3  
NPDES Permit No. LA 0007374

Dear Mr. Knudson:

On January 30, 1985, the BOD<sub>5</sub> concentration at outfall 005 was 53 mg/l, which exceeded our permit limitation of 45 mg/l. We became aware of this non-compliance when telephoned by our contract laboratory on February 6, 1985. We attribute this noncompliance to cold weather slowing the biological process in the sewage treatment plant. To alleviate this condition, bacteria were added to the plant on February 6, 1985, providing more organisms to compensate for the decrease in activity level. This should return the plant to within compliance levels if the plant had not already adjusted on its own.

Also on January 30, 1985, the oil and grease concentration at outfall 002 was 38 mg/l, which exceeded our permit limitation of 20 mg/l, and the TSS concentration was determined to be 238 mg/l, which exceeded our permit limitation of 100 mg/l. We were notified of these noncompliances at the same time we were notified of the BOD<sub>5</sub> noncompliance discussed in the preceding paragraph. We attribute the TSS noncompliance not to the amount of solids in the sample, but rather to the oil and grease present. When discussing this noncompliance with the technician who collected the sample, he indicated that the sample was relatively clear, although oily. A reanalysis for TSS, using a solvent wash, indicated a significantly reduced final weight, within compliance levels. We feel that in addition to the added weight of the oil, the oil in the sample trapped moisture in both the filter and sample which could not completely evaporate, which also contributed to the final sample weight.

The oil and grease concentration appears to be an effect of maintenance operations in the Turbine Building. The floor drains in the Turbine Building are tied in to this oil/water separator. It appeared that the oil in the

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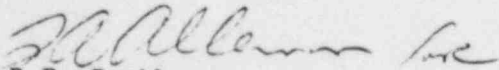
Mr. M.O. Knudson

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sample was a light oil, which would tend to pass through the separator more readily than heavier oils. The separator, drains, and practices are being checked to determine the best way to reduce the potential for future non-compliances. The sample collected on February 6, 1985 indicated that both the TSS and oil and grease concentrations were within compliance levels at that time.

Should you wish to discuss this matter further, please contact Chadi Groome of our Nuclear Licensing Office at (504) 595-2846.

Very truly yours,



R.P. Barkhurst

Plant Manager - Nuclear

RPB/CDG:dc

cc: J. Dale Givens - LA DEQ

US NRC: R.D. Martin - Region IV

**G.W. Knighton** - NRR

L.M. Bydoski - NRR

C.W. Billups - NRR