



PECO NUCLEAR

A Unit of PECO Energy

Robert W. Boyce
Plant Manager
Limerick Generating Station

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April 28, 1996

Steven J. O'Neil
Chief, Operations Section
Department of Environmental Resources
Bureau of Water Quality Management
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428

SUBJECT: Limerick Generating Station, Units 1 and 2
Non-Compliance of NPDES Permit No. PA-0051926

Dear Mr. O'Neil:

Description of the Non-Compliance:

At 1510 hours on March 14, 1996, while performing work activities in the vicinity of Manhole MH-07, station personnel observed sewage overflowing from MH-07 and into Storm Drain W-4. Manhole MH-07 receives input from the station's Work Management Center (WMC) restroom and directs flow into a sewage holding tank for routine removal. Prior to this incident, Storm Drain W-4 was aligned through a downstream 'Y' valve to allow flow into Outfall S-5.3, which discharges into the station's Holding Pond. While actions were being taken to isolate the flow to MH-07, sand bags and gravel were positioned around MH-07 to redirect the sewage flow away from Storm Drain W-4 and into MH-08 (i.e., manhole upstream of MH-07). An estimated 20 to 30 gallons of sewage flowed into Storm Drain W-4 before the overflow was secured at 1520 hours.

Immediate inspection and sampling of Outfall 001 (i.e., Schuylkill River discharge) and the Holding Pond revealed no detectable amounts of sewage; however, the potential exists that a non-detectable quantity of sewage may have been discharged into the Schuylkill River via the Holding Pond. Since Permit No. PA-0051926 does not allow sewage dilution via the Holding Pond or sewage discharge via Outfall 001, this incident was conservatively determined to be a non-compliance of the subject permit.

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Cause of the Non-Compliance:

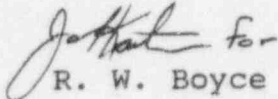
The cause of the sewage overflow was blockage of the pipe section between MH-07 and MH-08. The blockage consisted of rags, paper towels, and various debris from the WMC restroom. The WMC is utilized by contractor personnel during station outages.

Actions to Prevent Recurrence:

1. A sewer contract service pressure cleaned the sewer line downstream of MH-07. A plan is currently being developed to pressure clean the station's sewer lines on a periodic frequency. This plan is expected to be developed by April 30, 1996, and appropriate actions will be implemented as necessary.
2. An Event Bulletin, will be disseminated by June 1, 1996, to station supervision and appropriate offsite contractor management, to discuss this incident during all-hands meetings and pre-job briefings.

If there are any questions please do not hesitate to contact Mr. James L. Kantner at (610) 718-3400.

Sincerely,

 for
R. W. Boyce

DMS:cah

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cc: U.S. Nuclear Regulatory Commission
Document Control Desk
Docket Nos. 50-352/353
Washington, D.C. 20555

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Administrator, Region I, USNRC
Docket Nos. 50-352/353

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