



PECO NUCLEAR

A Unit of PECO Energy

Robert W. Boyce
Plant Manager
Limerick Generating Station

PECO Energy Company
Limerick Generating Station
PO Box 2300
Sanatoga, PA 19464-0920
610 718 2000

August 23, 1996

Mr. 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, Bradshaw Reservoir
Non-Compliance of NPDES Permit No. PA0052221

Dear Mr. O'Neil:

DESCRIPTION OF THE NON-COMPLIANCE

During the month of July 1996, Station personnel reported that the NPDES limit for fecal coliform concentration at the Bradshaw Reservoir pumps discharge into the east branch of the Perkiomen Creek was not met. The permit requires five consecutive grab samples each collected on different days, and the geometric mean of the five samples must be less than or equal to 200 colonies per 100 ml. An Ozone Disinfection System is utilized for treatment at the Bradshaw Reservoir Water Processing Facility.

On July 15, 1996, the geometric mean of the fecal coliform concentration was calculated to be 469 colonies per 100 ml, thereby exceeding the NPDES permit limit. Grab sampling was conducted 18 of the 31 days in July 1996. On July 29, 1996, the fecal coliform concentration reached a geometric mean of 139 colonies per 100 ml, thereby re-establishing NPDES permit compliance.

CAUSE OF THE NON-COMPLIANCE:

The cause of this non-compliance was degraded components in the Ozone Disinfection System. Physical inspection and testing of the ozone gas diffusers and associated piping was conducted on August 22, 1996. This revealed that the seals on many of the ozone diffusers were leaking. This hampered the efficient dispersion of ozone gas in the water, which resulted in inadequate disinfection performance.

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recip. T.T. Martin + N.S. PERRY

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CORRECTIVE ACTIONS TAKEN:

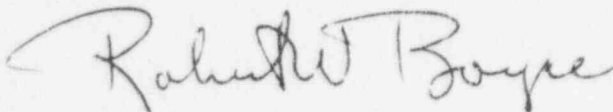
On August 22, 1996, adjustments were made to the ozone gas flow balance to improve the performance of the system until final repairs to the diffusers can be completed. Diffusers in the final contact chamber, which were severely leaking and causing the most ozone gas to be wasted, were isolated. Flow to the remaining diffusers in all three contact chambers was increased (i.e., same total system flow).

CORRECTIVE ACTIONS TAKEN TO PREVENT RECURRENCE:

Replacement seals for the Ozone Disinfection System are being procured and a second outage of the system will be performed to replace the seals on all 32 diffusers. A periodic maintenance task will be developed and implemented to detect indications of leaks in the ozone gas system piping.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert W. Boyce".

FDL/DMS

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

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

N. S. Perry
USNRC Senior Resident Inspector, LGS
Docket Nos. 50-352/353

Program Management Section (3WM52)
Permits Enforcement Branch
Environmental Protection Agency
Water Management Division
Environmental Protection Agency
Water Permits Section
Region III
841 Chestnut Building
Philadelphia, PA 19107

bcc: W. G. MacFarland	-	SMB 1-1
K. S. Kemper	-	SSB 2-1
M. P. Gallagher	-	SSB 3-1
J. L. Kantner	-	SSB 2-4
F. D. Lear	-	SSB 3-1
D. J. Cesaro	-	MO S21-2
R. M. Matty, Jr.	-	MO S21-2
G. A. Hunger, Jr.	-	CB 62A-1
Commitment Coordinator	-	CB 62A-1
PA DEP BRP Inspector	-	SSB 2-4
Correspondence Release Point	-	SMB 1-2