



MIDDLE SOUTH  
UTILITIES SYSTEM

**LOUISIANA**  
POWER & LIGHT

142 DELARONDE STREET • P.O. BOX 8008  
NEW ORLEANS, LOUISIANA 70174-8008 • (504) 368-2345

June 18, 1985

W3P85-1063  
3-A25.01.02  
A4.05

Director of Nuclear Reactor Regulation  
Attention: Mr. G.W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Waterford Steam Electric Station - Unit Number 3  
Docket No. 50-382  
U.S. Environmental Protection Agency Administrative Order  
Docket No. VI-85-609  
NPDES Permit LA 0007374

REFERENCES: (1) Louisiana Power & Light Company Letter Number W3P85-1289  
from R.S. Leddick to G.W. Knighton dated May 14, 1985  
(2) Louisiana Power & Light Company Letter Number W3P85-1039  
from R.P. Barkhurst to M.O. Knudson (EPA Region VI) dated  
May 17, 1985

Dear Mr. Knighton:

Louisiana Power & Light Company (LP&L) requested in reference 1 that Technical Specification Change NPF-38-01 be granted on an emergency basis so as to provide for plant operation with discharge of steam generator blowdown to the Circulating Water System. Because this modification to plant design and operation creates a new discharge pathway for liquid effluent to be released from Waterford Steam Electric Station - Unit Number 3 (Waterford 3), it was also necessary to apply for a modification to the Waterford 3 NPDES permit to allow for this new outfall. As the permit modification process requires a longer period of time than had been anticipated to implement the plant modification, LP&L also approached the EPA for emergency authorization for this discharge. The EPA issued the attached Administrative Order on May 29, 1985. This order authorizes this discharge, within the specified effluent limitations on flow, total suspended solids and pH, until such time as the permit modification is complete.

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Mr. G.W. Knighton

Page 2

Should you have any questions regarding this matter, please contact Mr. Robert J. Murillo of our Nuclear Licensing Office at (504) 595-2838.

Very truly yours,

A handwritten signature in dark ink, appearing to read "K. W. Cook", written in a cursive style.

K. W. Cook

Nuclear Support & Licensing Manager

KWC/CDG/ch

cc: B.W. Churchill, W.M. Stevenson, R.D. Martin, D.M. Crutchfield, J. Wilson,  
L.M. Bykoski, C.W. Billups, G.V. Allen, T.A. Flippo



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET

DALLAS, TEXAS 75270

May 29, 1985

JUN - 5 1985

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (P 556 450 205)

Mr. R. P. Burkhurst  
Plant Manager - Nuclear  
Louisiana Power and Light Company  
P.O. Box 6008  
New Orleans, Louisiana 70174

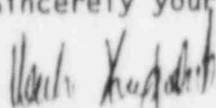
Re: Administrative Order Docket No. VI-85-609  
NPDES Permit No. LA0007374

Dear Mr. Burkhurst:

On May 17, 1985, you requested an emergency authorization to discharge steam generator blowdown to the circulation water system. The enclosed Administrative Order stipulates the requirements for such discharges.

If you have any questions concerning this Order, please contact Mr. M. S. Ramesh at the above address or telephone (214) 767-9054.

Sincerely yours,

  
Myron O. Hudson P.E.  
Director, Water Management Division, 6W

cc: Mr. Marion Fannaly  
Louisiana Department of Environmental Quality

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6

IN THE MATTER OF

LOUISIANA POWER AND LIGHT COMPANY

PROCEEDINGS UNDER SECTION 309(a)(3)  
and (a)(4), CLEAN WATER ACT,  
[33 U.S.C. 1319(a)(3) and (a)(4)],  
in RE: NPDES PERMIT NO. LA0007374

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DOCKET NO. VI-85-609

ADMINISTRATIVE ORDER

The following FINDINGS are made and ORDER issued pursuant to the authority vested in the Administrator of the Environmental Protection Agency by the above referenced statute (hereinafter the Act) and duly delegated to the Regional Administrator, Region 6, and duly redelegated to the undersigned Director, Water Management Division, Region 6.

I.

Louisiana Power and Light Company (hereinafter the Permittee) is a company doing business in the State of Louisiana and located in Killona, Louisiana, the mailing address for which is P.O. Box 6008, New Orleans, Louisiana 70174.

II.

Pursuant to the authority of Section 402(a)(1) of the Act [33 U.S.C. 1342(a)(1)], Region 6 issued National Pollutant Discharge Elimination System (NPDES) Permit No. LA0007374 to the Permittee on April 24, 1981, with an effective date of May 25, 1981. The permit authorizes the discharge of specified qualities and quantities of effluent to the 40 Arpent Canal and the Mississippi River. The permit also requires the submission of Discharge Monitoring Reports and Noncompliance Reports.

## III.

Section 301(a) of the Clean Water Act requires that except as in compliance with this Section and Sections 302, 306, 307, 318, 402 and 404 of the Act, the discharge of any pollutant by any person shall be unlawful.

## IV.

## FINDINGS OF VIOLATION

According to the Permittee's May 17, 1985 letter to this agency, the discharge of steam generator blowdown to the circulation water system has become critically important to continued operation of the plant. Since the effective NPDES permit does not cover this discharge, such discharges would be in violation of Section 301(a) of the Act. The NPDES permit is in the modification process to add this additional discharge (outfall) and this modification process generally takes up to 90 days.

## V.

## ORDER

Based on the foregoing FINDINGS OF VIOLATION and pursuant to the authority vested in the Administrator under Section 309(a)(3) of the Act [33 U.S.C. 1319(a)(3)], and duly delegated to the Regional Administrator, Region 6, and duly redelegated to the undersigned Director, Water Management Division, Region 6, it is ORDERED:

A. That the Permittee shall, beginning from the effective date of this ORDER and until the permit is modified, meet the following effluent limitations and monitoring requirements for the steam generator blowdown (outfall 01D):

Effluent Characteristic

	Discharge Limitations			
	Mass(lbs/day)		Other Units (Specify)	
	Daily avg.	Daily max.	Daily avg.	Daily max.
Flow-m <sup>3</sup> /Day(MGD)	N/A	N/A	(0.435)	(0.908)
Total Suspended Solids (TSS)	N/A	N/A	30 mg/l	100 mg/l

Effluent Characteristic

	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow-m <sup>3</sup> /Day(MGD)	Daily	Totalized
Total Suspended Solids (TSS)	1/week	Grab

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once/week by grab sample.

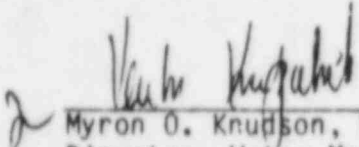
Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): Prior to mixing with the circulating cooling water.

B. That the Permittee shall submit Discharge Monitoring Reports and Noncompliance Reports in accordance with Parts I.C.2. and II.A.2. of the permit.

All the terms and conditions of the NPDES permit are unaffected by this Administrative Order and the modified permit may contain new or different limitations and monitoring requirements for this discharge.

The effective date of this ORDER shall be the date it is received by the Permittee.

DATED: This 29th day of May, 19 85.

  
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Myron O. Knudson, P.E.  
Director, Water Management Division (6W)