



**LOUISIANA
POWER & LIGHT**

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ROTH S. LEDDICK
Senior Vice President
Nuclear Operations

July 15, 1985

W3P85-2518
3-A25.01.02
A4.10

Ms. Ellen Caldwell
Permits Branch (6W-PS)
U.S. Environmental Protection Agency
Interfirst Two Building
1201 Elm Street
Dallas, Texas 75270

50-382

SUBJECT: Waterford Steam Electric Station
Unit Number 3
NPDES Permit Number LA0007374

Dear Ms. Caldwell:

Louisiana Power & Light Company (LP&L) has reviewed the subject draft permit issued by your office on June 21, 1985, and our comments are enclosed with this letter. In addition to our comments on the draft permit, we also noted several inconsistencies or inaccuracies in the accompanying fact sheet. However, as the fact sheet is not the binding document, unless you request otherwise, we will restrict our comments to the draft permit only.

We appreciate this opportunity to provide our comments, and trust that none of the items presented will delay issuance of the final permit. Should you wish to discuss any of our comments, please contact Ms. Chadi D. Groome of our Nuclear Licensing Office at (504) 595-2846.

Very truly yours,

R.S. Leddick
Senior Vice President
Nuclear Operations

RSL/CDG/ch

8507260245 850715
PDR ADOCK 05000382
P PDR

cc w/enclosure: J.D. Givens - LA DEQ
R.D. Martin - Region IV NRC
G.W. Knighton - NRR
M.O. Knudson
F. Humke

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LOUISIANA POWER & LIGHT COMPANY

COMMENTS ON DRAFT NPDES PERMIT NUMBER LA0007374

1. Page 2 of 33, Part I, Outfall 001:

- (a) The asterisk (*) which appears in the "Daily Avg" column for flow and temperature is undefined; a footnote should be added to define this symbol.
- (b) There is a typographical error in the units which appear in the "Daily Max" column for heat. The permit should read "BTU/hour".

2. Page 8 of 33, Part I, Outfall 01C:

The "Sample Type" for clarifying agents used indicates a grab sample. This "Sample Type" should specify "Record".

3. Page 16 of 33, Part I, Outfalls 004 and 005:

- (a) Outfall 005 does not appear in the heading for this combined page with identical effluent limitations for both outfalls, although outfall 005 is mentioned in the descriptive paragraph on this page. The heading should read "SECTION A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS - Outfalls 004 and 005".
- (b) The asterisk (*) which appears in the "Daily Avg" and "Daily Max" columns is undefined; a footnote should be added to define this symbol.

4. Page 19 of 33, Part II, Section A.3:

This section is not consistent with current federal regulations (see 40CFR 122.41(f)). The applicable standard condition does not enumerate possible causes for permit action. To be correct, the first sentence of this paragraph should end after the word "cause", and the section should resume with the second sentence, reading as follows:

"This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition."

5. Page 26 of 33, Part II, Section C.6:

This item is not consistent with current federal regulations (see 40CFR 122.41(1)(4)(ii)). To be correct, the last sentence of this paragraph should be deleted. However, LP&L would not object to this sentence if it were included as a clarifying "note" and indicated as such.

6. Page 33 of 33, Part III, Section F:

The current applicable regulation which defines "total residual chlorine", 40CFR 423.11(a), refers to 40CFR 136. 40CFR 136 references the 15th edition of Standard Methods, not the 13th edition as cited in the draft permit. For consistency, the 15th edition (or the edition specified in the most recent revision to 40CFR 136, should that change prior to permit issuance) should be specified in the final permit.