



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

September 26, 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, Unit 1 and 2 Non-Compliance
of NPDES Permit No. PA-0051926

Dear Mr. O'Neil:

Description of the Non-Compliance:

On August 12, 1996, a discharge was observed from the Unit 2 cooling tower overflow to Outfall 021. In accordance with the NPDES Permit a sample of the overflow discharge was obtained at 1450 hours on August 13, 1996. All analyses of the discharge sample were found to be within their limits except for the total residual chlorine. The total residual chlorine was omitted during this sample and was not discovered until after the condition causing the cooling tower overflow discharge was corrected.

Cause of the Non-Compliance:

The cause of the non-compliance is personnel error in performing the required analysis of the cooling tower overflow discharge sample. Although the individual was knowledgeable of the NPDES Permit requirements to sample and analyze, the individual failed to recognize that the sample was collected during a cooling tower chlorine injection cycle, and required a total residual chlorine analysis.

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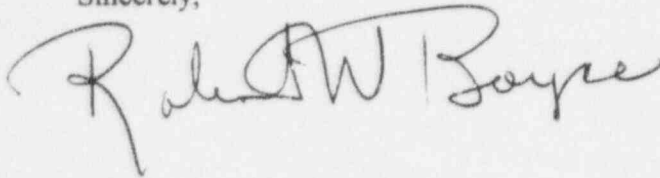
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Actions to Prevent Recurrence:

The responsible individual was counseled on the need to self check and to ensure that samples collected during the chlorine injection cycle are analyzed for total residual chlorine in accordance with the NPDES Permit requirements. In addition, this event was discussed at a Chemistry Group All Hands Meeting to emphasize the need to self check and more specifically to be cognizant of the cooling tower chlorine injection cycle. Assessment of this event is ongoing, and any significant findings or programmatic issues will be addressed as necessary.

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

Sincerely,

A handwritten signature in cursive script, reading "Robert W. Boyce". The signature is written in dark ink on a light background.

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

H. J. Miller
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)
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