Northeast
Utilities System

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Northeast Utilities Service Company
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Hartford, CT 06141-0270
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November 5, 1996
SES-96-GN042

D10459

VIA FACSIMILE AND U. S. MAIL

Mr. James Grier
Water Compliance Unit
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Dear Mr. Grier:

Millstone Station
Request to Discharge

On November 1, 1996, Northeast Nuclear Energy Company (NNECO) discussed with you the appropriateness of processing and discharging via DSN 001C-2 certain waters from the Unit 3 Reactor Plant Closed Cooling Water System (RPCCW) containing small amounts of hydrazine. Under normal conditions, RPCCW wastewaters are discharged through DSN 001C-9. As you requested NNECO is hereby notifying DEP of this situation in writing and is providing a description of the events relating to this proposed discharge.

Background

On October 30, 1996, at approximately 2100 hrs., plant personnel identified a spill of about 200 gallons of RPCCW water, which flowed into a floor drain leading to the Auxiliary Building sump. The spill occurred when a fitting failed on a jumper hose, which had been put in place as a temporary bypass around the pipe connecting the RPCCW to a surge tank. The jumper hose was installed to isolate the pipe for maintenance.

Once in the Auxiliary Building sump, the spilled RPCCW wastewaters were automatically pumped along with other waters in the sump into the radioactive wastewater treatment system and directed into the High Level Radiation Waste Drain Tank B ("Tank B"), which is part of DSN 001C-2.

Once in the Tank B, the RPCCW wastewater mixed with about 12,000 gallons of water from other sources authorized by the NPDES permit for this system. Chemical analysis of the Tank B wastewater indicated a hydrazine concentration of approximately 1.5 ppm. As a result, this tank was isolated to prevent discharge prior to DEP notification as well as to prevent any additional wastewater from entering the tank.

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As discussed with you, our intent is to process the waters now isolated in Tank B through the filter and demineralizers associated with this system (and described in the permit renewal application submitted, dated August 8, 1991, "Revised Form 2s") until hydrazine concentrations are at or below detection limits (~5 ppb). Because this water contains some level of radioactivity by virtue of having been mixed with wastewater within the Tank B, it must be released through a radiation monitored discharge point. No other discharge point currently used for radioactive waste discharges has both a limit for hydrazine and is monitored for radioactivity. (Two other discharge locations, DSN-001C-1a and DSN-001C-6 have both a limit for hydrazine and are monitored for radioactivity, but are currently free of radioactivity.)

NNECO believes the option proposed above for processing and discharging the spilled RPCCW water is a desirable alternative from an environmental and plant operational perspective. Moreover, the NPDES Permit for DSN 001C - 2 requires that adequate condenser circulating or service water be available in DSN 001C at the time of discharge. It is proposed that, upon discharge, monitoring requirements for DSN 001C - 2 and DSN 001C - 9 will both be met.

Given the accumulation of normal process water in the High Level Radiation Waste Drain Tank A, we believe it may be necessary as soon as Thursday, November 7, 1996, to place Tank B back in service while Tank A is isolated and discharged.

Should you require additional information regarding the above matter, please call Mr. Paul Jacobson at (860) 665-3617.

Very truly yours,

Stephen E. Scace
Acting Director - Nuclear Engineering Programs

cc: Mr. Michael J. Harder
Mr. Robert Smith
Mr. Kevin McCarthy
U.S. NRC - Document Control Desk.