

May 12, 1997
Linda Levy
Assistant Secretary
Office of Water Resources
Attention: Enforcement Section
Louisiana Department of Environmental Quality
PO Box 82215
Baton Rouge, LA 70884-2215

Subject: Unanticipated Bypasses on May 6 and 7, 1997
Reference: Water Discharge Permit No. LDWDPS WP0409 and NPDES
LA0042731
File No.: G1.11.2

RBG - 43,933

Dear Ms. Levy:

This letter is a written follow-up for a 24 hour notification of several unanticipated bypasses of our station Circulating Water System (CWS) which occurred at River Bend Station (RBS) on May 6 and 7, 1997.

At 0903 on May 6, 1997 RBS experienced a manual shutdown of the station. As a result of the shutdown, the CWS overflowed via the pump structure which feeds the main cooling tower flume. This transient occurred due to the reduced heat load, experienced during a shutdown, and the resulting increase in flume level. Following the shut down the makeup system to the circulating water system was secured by operations to compensate for the decrease demand for makeup water. However, the line which feeds the CWS pumps continued to drain causing an overflow at the circulating pump structure. The source of this makeup water is clarified Mississippi River water. The bypass occurred at approximately 0910 and was secured at approximately 1245 resulting in a total volume of approximately 20,500 gallons overflowing into a storm drain which provides drainage from the east side of the plant. This drainage is permitted storm water Outfall 006 which drains into East Creek and eventually the Mississippi River via Grants Bayou and Thompson Creek. The observed flow rate of water entering the storm drain at the time of the event was

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approximately 100 gal/min. The CWS water is treated with 93% sulfuric acid for pH control, sodium hypochlorite/bromine to control biological growth and a scale inhibitor for system component corrosion control. This system supplies water to the station main condenser system and is cooled by four induced draft mechanical cooling towers.

Immediate actions were taken to secure makeup to the CWS system by operations following the shutdown, and environmental staff personnel responded by obtaining a representative sample of the water at the Outfall 006 sample station. The following tests were performed and results are as follows:

<u>Parameter</u>	<u>Concentration</u>
Oil and Grease	0.00 mg/l
Total Organic Carbon	10.98 mg/l
pH	7.4 SU
Free Available Chlorine	0.0 ppm

All results were within the limits specified in both the federal and state water discharge permits. Telephone notification was made to LADEQ's Ms. Lois Edmonds at 1628 on May 6, 1997.

At approximately 0220 on May 7, 1997 operations personnel discovered CWS water overflowing from cooling tower 1A. The unanticipated bypass was secured after ten minutes and resulted in a discharge of approximately 10,000 gallons. Environmental samples were taken and analyses results are as follows:

<u>Parameter</u>	<u>Concentration</u>
Oil and Grease	2.20 mg/l
Total Organic Carbon	3.22 mg/l
pH	7.27 SU
Free Available Chlorine	0.0 ppm

All results were within the limits specified in both the federal and state water discharge permits. Telephone notification was made to LADEQ's Ms. Carol Jones at 1526 on May 7, 1997.

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Again, at approximately 1615 on May 7, 1997 operations personnel discovered CWS water overflowing from cooling tower 1A. The unanticipated bypass was secured at 1655 and resulted in a discharge of approximately 8,000 gallons. Environmental samples were taken and analyses results are as follows:

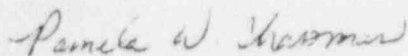
<u>Parameter</u>	<u>Concentration</u>
Oil and Grease	0.00 mg/l
Total Organic Carbon	17.24 mg/l
pH	8.28 SU
Free Available Chlorine	0.0 ppm

All results were within the limits specified in both the federal and state water discharge permits. Telephone notification was made to LADEQ's Ms. Jan Nolan at 1508 on May 8, 1997.

The latter two bypasses were due to changing system flow conditions which caused debris to break loose from various areas of the cooling tower and plug the outfall screen. The resulting high pressure across the screen caused the tower to overflow. In each instance, maintenance personnel removed and cleaned the screen and the water level in the tower returned to normal. The cooling tower outfall screens continue to be monitored and will be cleaned as required.

I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Pamela W. Chapman
Coordinator-Environmental

PWC/pwc

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