



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

June 27, 1997

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
Two Non-Compliances of NPDES Permit No. PA-0051926

Dear Mr. O'Neil:

Description of the Non-Compliances:

Non-Compliance #1

On May 12, 1997, the Unit 1 cooling tower overflowed thereby requiring sampling at Outfall 021. The required samples were collected and preserved per 40 CFR Chapter 1 Paragraph 136.3 Table II. During the transfer of data from the chain of custody (COC) sheet to the sample bottle label, the requirement to analyze the sample for Kjeldahl nitrogen was omitted. The NPDES Permit only requires this parameter to be monitored and reported, and no limitation is specified.

Non-Compliance #2

On May 21, 1997, the Net Total Suspended Solids (TSS) for the cooling towers was identified to be 82.3 ppm, thereby exceeding the NPDES permit daily limit of 60 ppm. This elevated TSS reading also caused the monthly average of 30 ppm to be exceeded.

Cause of the Non-Compliances:

Non-Compliance #1

The cause of the Kjeldahl nitrogen analysis omission was personnel error. Although the responsible station individual is knowledgeable of the NPDES Permit requirements and correctly filled out the COC sheet, the individual failed to transcribe the proper analysis requirement to the sample bottle label. A contributing factor to this non-compliance was the off-site laboratory review is limited to sample bottle accounting and the laboratory does not cross check the sample requirements of the COC sheet to the sample bottle markings. As such, the Kjeldahl nitrogen analysis requirement on the COC sheet was not identified as missing on the sample bottle.

9707030269 970627
PDR ADDCK 05000352
S PDR



IE23 1/0

June 27, 1997
Page Two

Following discovery of this incident, the sample was available at the off-site laboratory, however, the sample was not maintained after analysis at 4°C as required by 40 CFR Chapter 1 Paragraph 136.3 Table II. The sample was analyzed and reported in the May DMR with applicable remarks concerning sample storage.

Non-Compliance #2

The cause of the elevated TSS daily limit and monthly average has two causal factors. First, the Schuylkill River TSS levels had recently spiked due to transient conditions related to storm runoff. This resulted in unusually high turbidity in the cooling tower make up water. Second, the sample line had accumulated solids which were purged into the sample during its collection. An investigation revealed that the sample tubing had been in service for over 12 months and was fouled. The tube fouling was confirmed by elevated zinc concentrations which coincided with the elevated TSS results.

Actions to Prevent Recurrence:

Non-Compliance #1

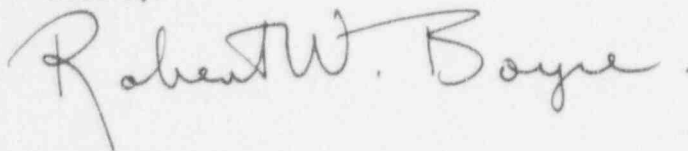
The responsible individual was counseled on the need to self check and to ensure that the COC sheet and sample bottle are in agreement before allowing the sample to be shipped to the off-site laboratory. The off-site laboratory was instructed to perform a cross check of the sample requirements of the COC sheet to the sample bottle markings. The sample bottle label has been upgraded to include a listing of analyses that are performed by the off-site laboratory so that the required analysis, in accordance with the NPDES Permit, can be circled. In addition, this non-compliance will be discussed at a Chemistry Group All Hands Meeting to emphasize the need to self check.

Non-Compliance #2

The elevated TSS resulting from weather and river conditions does not have an action that will prevent its recurrence. The sample tubing was replaced and all further analyses to date have had zero Net TSS. This tubing will be changed out semi-annually using existing plant scheduling tools.

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

Sincerely,

A handwritten signature in cursive script that reads "Robert W. Boyle". The signature is written in dark ink on a light-colored background.

June 27, 1997
Page Three

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)
Permits Enforcement Branch
Environmental Protection Agency
Water Management Division
Environmental Protection Agency
Water Permits Section
Region III
841 Chestnut Building
Philadelphia, PA 19107