

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL



In The Matter of Compliance By The)
)
WASHINGTON PUBLIC POWER SUPPLY)
SYSTEM NUCLEAR PROJECT NO. 2)
)
With Chapters 80.50 and 90.48 RCW and)
the Rules and Regulations of the)
Energy Facility Site Evaluation Council)
.....)

ORDER REGARDING
NOTICE OF VIOLATION
EFSEC NO. 89-001

This matter came on regularly before the Energy Facility Site Evaluation Council (hereinafter Council or EFSEC) at its regular meeting of September 25, 1989. The Council issued Notice of Violation, EFSEC No. 89-001, on August 28, 1989 to the Washington Public Power Supply System (hereinafter Supply System) for an alleged discharge of circulating blowdown water at Nuclear Project (Plant) No. 2 which was not in compliance with effluent limitations for pH. Pursuant to RCW 80.50.150, the notice specified a time period in which the Supply System could appeal the notice. By letter dated September 15, 1989, the Supply System waived its right to a formal hearing.

Based upon the foregoing, the Council enters the following:

FINDINGS OF FACT

1. That Plant No. 2 holds National Pollutant Discharge Elimination System (NPDES) Permit No. WA-002515-1, issued by the Council, and has held such permit at all times material hereto.
2. That at approximately between 0500 and 0800 hours on May 29, 1989, the pH of the circulating water blowdown being discharged was above the 9.0 limit specified in the NPDES Permit.
3. That Plant No. 2 operational procedures were inadequate to cover the circumstance where the plant was in a refueling and maintenance outage and pumps were not in operation to ensure adequate mixing of the corrosion inhibitor (Calgon PCL-8125) to reduce the pH level of the discharge water.
4. That concurrent to the circulating water pumps and plant service water pumps not being in operation, the system's pH alarm was out of service.
5. That the discharge did not threaten the public health or environment.
6. That the effect of the discharge appears to have been mitigated by the small increment and duration of the excursion, the blowdown rate, the hold-up and mixing afforded by 3.5 miles of blowdown pipe and the rapid mixing which occurs in the Columbia River.
7. That the Supply System has completed revisions to relevant plant operating procedures and training of Chemistry and Operations personnel to prevent future recurrence of such an incident.
8. That Plant No. 2 has been issued only one previous violation in its six years of operation.
9. That Plant No. 2's operational record and the Supply System's corrective actions tend to mitigate the severity of the violation.
10. That the Supply System has notified the Council that they do not take issue with the findings contained in the Notice of Violation.

Based upon the foregoing Findings of Fact, the Council enters the following:

CONCLUSIONS OF LAW

That the conduct described in Findings of Fact No. 2 above constitutes a violation of Plant No. 2 NPDES Permit Conditions S1.B. Notes (3) and (4) and, pursuant to RCW 80.50.150, is grounds for the assessment of a civil monetary penalty.

Based upon the foregoing Findings of Fact and Conclusions of Law, the Council enters the following:

ORDER

IT IS HEREBY ORDERED That the Supply System is on notice that a violation has been found and that, based upon the mitigating conditions of Findings of Fact 5, 6, 7 and 8, no penalty shall be assessed.


The Council notes that any further violation of the terms of the NPDES Permit may result in an assessment of a civil monetary penalty.

The Council admonishes the Supply System to be mindful of all of the conditions of the Plant No. 2 NPDES Permit including, but not limited to, its responsibilities to perform the following:


1. Implement corrective actions, including revisions to plant operating procedures, to:
 - a. Ensure proper mixing and distribution of chemicals through the circulating water system during:
 - 1) Normal operations, and
 - 2) Refueling and maintenance outages;
 - b. Have the circulating water system pH alarm in service during blowdown; and
 - c. Meet NPDES Permit effluent limitations and monitoring requirements for discharges at all times.
2. Conduct training for plant Chemistry and Operations personnel in revised discharge procedures.

DATED at Olympia and effective this 25th day of September 1989.

WASHINGTON STATE ENERGY
FACILITY SITE EVALUATION COUNCIL

By 
Curtis Eschels
Chairman

ATTEST:

By 
William L. Fitch
Executive Secretary