

**WASHINGTON STATE
ENERGY FACILITY SITE EVALUATION COUNCIL**

RESOLUTION 286

WHEREAS, On October 9, 1995, the Energy Facility Site Evaluation Council (Council) issued a National Pollutant Discharge Elimination System (NPDES) Permit No. WA-002515-1 to the Washington Public Power Supply System (Supply System) for wastewater discharges at the Supply System's Nuclear Plant No. 2 (WNP-2); and

WHEREAS, The authority for enforcement of compliance with NPDES permits and for the assessment of penalties is vested in the Council by RCW 80.50.040 and 80.50.150; and

WHEREAS, In accordance with NPDES General Condition G4, the Supply System informed the Council by telephone and by letter dated July 31, 1996, that NPDES Permit condition S1.A was violated on July 24/25, 1996, and again on July 26/27, 1996; and

WHEREAS, The permit violations resulted from the inadvertent leakage of chlorinated cooling water through faulty bypass valve CBD-V-3 which caused the quantity of chlorine in the blowdown pipe to exceed the permitted concentration for approximately 13 hours; and

WHEREAS, The Council issued to the Supply System a Notice of Incident and Request for Assurance of Compliance (NOI) by letter dated August 13, 1996; and

WHEREAS, The Supply System provided the required assurance of compliance by letter dated September 13, 1996; and

WHEREAS, In a letter to EFSEC dated August 13, 1997, the Department of Ecology concluded that formal enforcement action is not recommended for this incident; and

WHEREAS, The effect of the discharges appears to have had no environmental impact due to the delay and mixing afforded during the approximately 8 hours required for the water to travel through the 3.5 miles of blowdown line to the river, as well as the in-river mixing that occurs in the Columbia River that, taken together, provides reasonable assurance that the water quality standards for total residual chlorine were not exceeded at the mixing zone boundary; and

WHEREAS, On July 28, 1996, the Supply System permanently disabled the bypass line by installing a blocking plate on the downstream face of bypass valve CBD-V-3 to prevent the recurrence of bypass line leakage regardless of valve position; and

WHEREAS, A high level of assurance against inadvertent leakage is provided on the remaining discharge flow path by the presence of three (3) valves in series; and

WHEREAS, More than a year has passed without further incidents;

NOW, THEREFORE, BE IT RESOLVED, That the Energy Facility Site Evaluation Council hereby closes the Notice of Incident and Request for Assurance of Compliance dated August 12, 1996, subject to the verbal assurance that the following actions have been satisfactorily addressed; and hereby admonishes the Supply System to be mindful of all conditions of the WNP-2 NPDES permit including the requirement to take immediate corrective actions for any non-compliant condition.

1. Confirmed that the blank flange is in place and that appropriate procedural changes have been made to prevent the use of the bypass valve in plant operations.
2. Verified that the existing flow meter is on a regular recalibration schedule.
3. Identified the preventative maintenance schedule for valves in the biofouling system.
4. Revised plant procedures and/or notification schedules to identify the Ecology Kennewick office as a contact for NPDES noncompliance notifications.

Dated this 8th day of September 1997.

Washington State Energy Facility Site Evaluation Council

By:

C. Robert Wallis, Acting EFSEC Chair

Attest:

Jason J. Zeller, EFSEC Manager