

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512



May 25, 2001

Mr. Neal Parece
Project Director
Constellation Power Source Generation, Inc.
111 Marketplace, Suite 200
Baltimore, MD 21202

SUBJECT: Approval of Modification to the Requirement of High Desert Power Project Condition of Certification HAZ-5 from a Non-Enclosed Double-Walled Ammonia Tank to a Single Walled Enclosed Ammonia Tank (97-AFC-1C)

Dear Mr. Parece:

California Energy Commission staff have reviewed your request to change the requirement in condition HAZ-5 of the High Desert Power Project (HDPP) Commission Decision. The current condition requires a double-walled non-enclosed aqueous ammonia tank. It is very unusual to store aqueous ammonia in a double-walled tank. Due to the lack of availability of this type of tank for aqueous ammonia storage, you have requested to replace the design with a single-walled enclosed tank with an ammonia detection system within the enclosure. This system will be interconnected to the central control system and provide an alarm to warn operators of an ammonia leak. Energy Commission staff's analysis has determined that the new design is effectively equivalent in terms of risk reduction. This letter approves the requested change.

As directed by Governor's Executive Order D-25-01, concerning post-certification amendments, we have expedited review of this proposed project modification because statutes and implementing regulations that normally apply to review and approval of this amendment have been suspended. Energy Commission staff have concluded that this modification has no potential for adverse environmental or public health and safety impacts. Therefore, you are authorized to proceed with the project modifications as requested. A copy of this letter will be posted on the Energy's Commission website at www.energy.ca.gov, and we will file a California Environmental Quality Act Notice of Exemption with the State Clearinghouse.

The following is the revised language of Condition of Certification HAZ-5 (new wording shown double underlined, deleted wording shown with strikeout).

HAZ-5The project owner shall design the aqueous ammonia storage facility to ensure that the ammonia concentration does not exceed 75 ppm at the fence line in the event of a release by meeting the following criteria:

1. A ~~vertically mounted double-walled~~ fully enclosed single-walled ammonium hydroxide storage tank of no more than 50,000 gallons in capacity, which provides a minimum interstitial space of two-feet between the protective structure and the tank. Both the tank and enclosure building is shall be designed to UBC Seismic Zone 4 and ~~API 650 standards Section VIII, Div. 1 of the ASME Boiler and Pressure Vessel Code.~~
2. A liquid-tight diked area around the tank capable of containing the entire 50,000 gallons of aqueous ammonia plus 10%.
3. A loading area such that any aqueous ammonia spilled there will drain into an underground sump capable of containing one entire truck delivery plus 10%.

Verification: At least sixty (60) days prior to the initial delivery of aqueous ammonia, the project owner shall provide designs for the aqueous ammonia storage facility as described in this Condition of Certification to the CPM for approval.

If you have any questions, please contact Steve Munro, Compliance Project Manager, at (916) 654-3936, or by e-mail at smunro@energy.state.ca.us.

Sincerely,

ROBERT L. THERKELSEN, Deputy Director
Systems Assessment & Facilities Siting

cc: Rick Tyler