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A Edward Scherer
Manager of Nuclear
Oversight and Regulatory Affairs

April 24, 2001

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: **Docket No. 50-206**
Report of NPDES Permit Violation
San Onofre Nuclear Generating Station, Unit 2

Reference: Letter, H. W. Newton (SCE) to John Robertus (California Regional Water Quality Control Board [CRWQCB]), "NPDES Discharge Monitoring Report, Unit 2," March 29, 2001

Gentlemen:

Section 3.2, Appendix B of Operating License and Technical Specification, License No. NPF-10 for San Onofre Unit 2 requires violations of the NPDES Permit or State certification (pursuant to Section 401 of the Clean Water Act), to be reported to the NRC by submittal of copies of the reports required by the NPDES Permit or certification. This letter provides one such report.

In Reference (1), SCE reported to the CRWQCB that a sample obtained on the Unit 2 Blowdown Processing Sump (BPS) on February 5, 2001 indicated an exceedance of oil and grease. The sample for oil and grease was analyzed and the result was 27.5 mg/l which exceeded the instantaneous limit of 20 mg/l. Also, due to the low number of Unit 2 BPS samples taken during the month, the monthly average was exceeded.

Additional details can be found in the attached referenced letter.

If you require additional information, please contact Clay E. Williams at (949) 368-6707.

Sincerely,

RJ McDay
for AES

Attachment

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
L. Raghavan, NRC Project Manager, San Onofre Units 2 and 3
J. G. Kramer, NRC (Acting) Senior Resident Inspector, San Onofre Units 2 and 3

P. O. Box 128
San Clemente, CA 92674-0128
949-368-7501
Fax 949-368-6085

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March 29, 2001

Mr. John Robertus
California Regional Water Quality Control Board
San Diego Region
9771 Clairemont Mesa Boulevard, Suite B
San Diego, California 92124-1331

SUBJECT: NPDES Discharge Monitoring Report
San Onofre Nuclear Generating Station, Unit 2

Dear Mr. Robertus:

The NPDES Discharge Monitoring Report (DMR) for San Onofre Unit 2 covering the month of February is submitted in accordance with the requirements of Order No. 99-47 (NPDES Permit No. CA0108073). A summary of the generating unit's status and significant analytical results is provided below.

The unit was operational all month. All sampled water sources were found to be within permit limits with two exceptions. On the afternoon of February 3, 2001, a switchgear fire occurred at Unit 3 during the start up of the plant after a scheduled refueling outage. The loss of power to the Turbine Building caused the main condenser to fill with water. As part of the recovery from this casualty, large amounts of condensate needed to be drained from the main condenser hotwell. This water was drained to the Unit 2 Blowdown Processing Sump (BPS). Prior to the release of the BPS sump, samples were obtained for total suspended solids (TSS) and oil and grease on February 4th at 10:20 p.m. A visual check of the samples indicated low levels of TSS, oil and grease. The release of the BPS sump to the Unit 2 outfall was authorized based on visual samples. On the afternoon of February 5th, the sample for oil and grease was analyzed and the result was 27.5 mg/l. This was above the instantaneous limit of 20 mg/l. Based on the laboratory analysis, release of the BPS sump to the Unit 2 outfall was terminated. A sample obtained at 1625 that day indicated a return to limits at 12.9 mg/l. After samples from the U3 main condenser hotwell for oil and grease were verified to be within limits, the release of the U3 main condenser hotwell was restarted directly to the U2 outfall from the U3 main condenser, bypassing the U2 BPS sump. Due to the low number of Unit 2 BPS samples taken during the month, the monthly average was also exceeded.

The elevated oil and grease in the U2 BPS sump was probably caused by the fire at Unit 3 that resulted in oily water from Unit 3 flowing into the sump. Prior to sampling, the Unit 2 BPS sump is mixed to ensure a representative sample. We believe this caused the oil in the sump to become emulsified. This prevented the chemistry technician from interpreting the sample correctly during the visual check. To prevent reoccurance of this event in the future, all batch

San Onofre Nuclear Generating Station
P. O. Box 128
San Clemente, CA 92674-0128

releases where an NPDES sample is obtained will be analyzed and results obtained for oil and grease prior to that batch release commencing.

Pursuant to Order No. 99-47, Reporting Requirement 10, the following representative has prepared and is authorized to sign the reports required by this order: Robert K. Heckler, Environmental Engineer.

I certify under penalty of law that this document and all attachments were prepared under my 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,

H. W. Newton
Manager, Site Support Services

Enclosure

cc: Environmental Protection Agency, Region IX

bcc: D. Nunn
H. W. Newton/M. J. Johnson - w/o enclosure
J. Hirsch
R. Waldo
K. T. Herbinson
J. Demlow - w/o enclosure
CDM Files
IDB - NPDES/R. K. Heckler