

July 31, 2007

Mr. Mark Rauscher
Assistant Environmental Manager
Surfrider Foundation
P.O. Box 6010
San Clemente, California 92674-6010

SUBJECT: RESPONSE TO YOUR LETTER

Dear Mr. Rauscher:

This is in response to your letter to Mr. Stuart Richards, dated March 1, 2007, in which you expressed concern with the tritium (Hydrogen-3) contaminated groundwater identified in the soil underneath portions of the San Onofre Nuclear Generating Station Unit 1 (SONGS-1) site which is undergoing decommissioning. We apologize for the delay in responding to your letter.

The first concern stated in your letter is that Southern California Edison (SCE or the licensee) has been unable to quantify the size, nature and source of the tritium in the ground water on the SONGS-1 site. Tritium from past operations was identified in the soil and groundwater underneath portions of the SONGS-1 containment sphere in the summer of 2006 as it was being prepared for dismantlement. Although required reporting levels were not reached, the license informed both the Nuclear Regulatory Commission (NRC) and the State of California about this contamination and began investigations to identify the extent and source of the contamination. Among other things, this investigation involved the drilling of a number of additional sampling and dewatering wells around the footprint of the Unit 1 reactor building to assess the extent and any potential migration of the contamination. NRC Inspection Report 050-00206/06-015, dated November 20, 2006, contains a detailed description of the NRC's followup to the licensee's discovery of the tritium. This report is available electronically in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html/>. The NRC's inspection included confirmatory groundwater sampling performed by the NRC. The licensee's investigation identified three possible sources for the tritium as described in the aforementioned NRC Inspection Report 050-00206/06-015. All potential sources of the contamination have been or will be removed as part of site decommissioning.

Your second concern is that SCE continues to discharge contaminated liquids into the ocean. All commercial nuclear power plants are allowed to discharge liquid effluents containing small amounts of tritium. Such discharges are regulated by the NRC and are permitted under the Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES), which, in most cases, is administered by authorized States. The NRC requires that licensees control, monitor, and report the types and total amount of liquid effluents released to ensure that potential impacts are detected and investigated. Licensees accomplish this, in part, through the implementation of their Radiological Environmental Monitoring Program (REMP).

Your third concern is that testing off-site drinking water wells is not satisfactory and on-site monitoring should be mandatory, not voluntary. In addition to monitoring the liquid and gaseous effluent pathways, the REMP requires off-site sampling of the site environs at specified intervals. REMP requirements include reporting the levels of radioactive constituents such as tritium in ground water that may be used for drinking water. Reports submitted in accordance with the REMP cover planned and unplanned releases and are available to the public through ADAMS. NRC routinely reviews, through the inspection program, the licensee's control, monitoring, and reporting of radiological discharges. All discharges from the SONGS site are in compliance with the site NPDES permit and NRC regulations at 10 CFR 20.1301- 20.1302 and Appendix B.

Your letter also includes three requests. Your first request is cessation of all tritium discharges to the ocean (by SCE) and a full report on the nature and extent of the contaminated ground water found at SONGS Unit 1. All NRC licensees, including SCE, are authorized to discharge limited amounts of radioactive material in accordance with NRC and EPA regulations. The NRC limits are presented in Table 2 to Appendix B to 10 CFR 20. This regulation can be viewed at <http://www.nrc.gov/reading-rm/doc-collections/cfr/part020/>. A description of the tritium release and migration, and the SCE actions to effect remediation are available in the previously mentioned NRC Inspection Report, as well as future reports.

Your second request is for expanded ground water testing throughout the SONGS site. As you are aware, SCE is implementing the Nuclear Energy Institute (NEI) Groundwater Protection Initiative. This initiative identifies and schedules implementation of actions to assure timely detection and effective response to inadvertent radiological releases in groundwater. More information on this initiative are available on the NEI website (www.nei.org). NRC will review the site specific plans developed under this initiative as part of our routine inspection program, to ensure that it is adequate to detect and respond to inadvertent releases in a timely manner.

Your last request is for expanded testing of the beach and near-shore water around Unit 1 and south of Units 2 and 3. As mentioned above, SONGS is required to implement the NRC approved REMP for the entire site, which monitors discharge pathways. This REMP specifies other off-site sampling locations to ensure protection of the environment, including the beach around Units 2 and 3. The NRC believes the current environmental sampling program required of SONGS is appropriate to ensure that unidentified offsite releases will be detected. With respect to the previously identified tritium contamination at Songs-1, there is no evidence that this contamination has migrated offsite.

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The NRC will continue to inspect and monitor the decommissioning activities at SONGS Unit 1. We invite you to read the inspection reports listed on our website, and those we will publish in the future. Should you have any additional questions, please contact Mr. J. C. Shepherd of my staff at 301-415-6712 or jcs2@nrc.gov.

Sincerely,

/RA/ B.VonTill for

Keith I. McConnell, Deputy Director
Decommissioning and Uranium Recovery
Licensing Directorate
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

Docket No.: 50-206

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OFC	FSME/DWMEP	FSME/DWMEP	RIV	FSME/DWMEP	FSME/DWMEP
NAME	J.Shepherd	T.Mixon	B.Spitzberg	B.Watson	K.McConnell
DATE	7 /17 /07	/ /07	7/17/07	7/23/07	7/31/07

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