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A. Edward Scherer
Manager of
Nuclear Regulatory Affairs

September 21, 2007

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

Subject: **Docket No. 50-206, 50-361 and 50-362**
Notice of Violations of NPDES Permits and Required Response
San Onofre Nuclear Generating Station, Units 1, 2 and 3

References: 1) Letter from John Robertus, California Regional Water Quality Control Board San Diego Region, to H. W. Newton, Southern California Edison, dated July 31, 2007
2) Response letter from Mary Jane Johnson, Southern California Edison, to John Robertus, California Regional Water Quality Control Board San Diego Region, dated August 29, 2007

Dear Sir or Madam:

In accordance with National Pollution Discharge Elimination System (NPDES) Order Nos. 2000-04, R9-2005-0005 and R9-2005-0006, NPDES Permits Nos. CA0001228, CA0108073 and CA0108181, for San Onofre Nuclear Generating Station (SONGS) Units 1,2, and 3, a compliance inspection was conducted on March 12, 2007 to determine the accuracy and reliability of the SONGS facility and the reporting program for the period, July 2006 through February 2007.

The California Regional Water Quality Control Board, San Diego Region, notified Southern California Edison (SCE) by letter (Reference 1) of two violations of the NPDES permits.

SONGS Unit 1 Permanently Defueled Technical Specification D6.15.2(c) of Facility Operating License (No. DPR-13) and SONGS Units 2 and 3 Facility Operating Licenses (Nos. NPF-10 and NPF-15), Appendix B, Section 3.2, require violations of the NPDES Permit reported to the NRC by submitting copies of the reports required by the NPDES Permit. Accordingly, a copy of the required SCE response (Reference 2) to the notice of violation and the accompanying report received by SCE (Reference 1) are provided as attachments to this letter.

P.O. Box 128
San Clemente, CA 92672
949-368-7501
Fax 949-368-7575

COOL

UKR

If you have any questions, please contact Mr. Clay E. Williams at (949) 368-6707.

Sincerely,

A handwritten signature in black ink, appearing to read "Clay E. Williams". The signature is fluid and cursive, with the first name "Clay" being the most prominent.

Attachments As Stated

cc: E. E. Collins, Jr., NRC Regional Administrator, Region IV
N. Kalyanam, NRC Project Manager, SONGS Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, SONGS Units 2 and 3
D. B. Spitzberg, NRC Region IV, SONGS Unit 1
J. C. Shepherd, NRC Project Manager, SONGS Unit 1
S. Y. Hsu, California Department of Health Services



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board San Diego Region

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July 31, 2007

Mr. H. W. Newton
Manager, Site Support Services
Southern California Edison
P.O. Box 128, San Clemente, CA 92674-0128

In Reply Refer to:
NCR:13-0088.01:ccheng

Dear Mr. Newton:

**SUBJECT: NOTICE OF VIOLATION AND REQUIRED TECHNICAL REPORT
NPDES COMPLIANCE INSPECTION FOR NPDES ORDER NOS.
2000-04, R9-2005-0005 and R9-2005-0006, NPDES PERMIT NOS.
CA0001228, CA0108073 and CA0108181**

**FACILITIES: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 1-3, SAN
DIEGO, CALIFORNIA**

On March 12, 2007, compliance inspections of the subject facilities were jointly conducted by PG Environmental, an USEPA contractor, and the San Diego Regional Water Quality Control Board (Regional Board). The primary purpose of the inspection was to determine the accuracy and reliability of the facility's self-monitoring and reporting programs, as well as the facility's compliance with Regional Board Order Nos. 2000-04, R9-2005-0005 and R9-2005-0006, NPDES permit Nos. CA0001228, CA0108073 and CA0108181.

Enclosed is a copy of the inspection report prepared by PG Environmental. Please review the report carefully. The report includes a summary of the inspector's findings and an evaluation of the facility's effectiveness in complying with permit requirements.

The inspection identified that the facility was out of compliance with a number of requirements specified in the NPDES permits. I request that Southern California Edison take steps to address each of the areas receiving "marginal" or "unsatisfactory" ratings as indicated in the report, as well as the violations highlighted below.

Pursuant to California Water Code Section 13267, please submit a response report to this agency by August 31, 2007 describing the steps that have been or will be taken, and the estimated time of completion of these steps.

Violations of Order No. 2000-04, NPDES Permit No. CA0001228:

1. Missing the time of analysis and the name of the analyst(s) performing the analysis on monitoring results submitted by the contract laboratory, which are required per Section D.2. of the permit.
2. The 15-minute maximum holding time for pH analysis specified in 40 CFR Part 136 is exceeded on treated sewage effluent samples.

Note that violations documented by the discharger in its DMRs were either addressed or will be addressed by Regional Board staff during the review of these DMRs.

The heading portion of this letter includes a Regional Board code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence, please include this code number in the heading or subject line portion of all correspondence and reports to the Regional Board pertaining to this matter.

If you have any questions regarding the inspection report please contact Mr. Charles Cheng at (858) 627-3930 (email: ccheng@waterboards.ca.gov).

Respectfully,



JOHN H. ROBERTUS
Executive Officer

JHR:MA:cqc

Enclosure: NPDES Compliance Evaluation Inspection (CEI) Reports, 2007, PG Environmental, LLC

CIWQS Codes:

Inspection ID: 1138602
Violation ID: 595306 (1), 595307 (2)
Enforcement ID: 328973

CC: Ken Greenberg, Water Division (WTR-7)
U. S. Environmental Protection Agency, Region 9
75 Hawthorne Street, San Francisco, CA 94105

**EPA Region IX and California Regional Water Quality Control Board
Compliance Evaluation Inspection (CEI) Checklist**

Name and Location of Facility Inspected San Onofre Nuclear Generating Station (SONGS) Units 1-3 5000 Pacific Coast Highway San Clemente, CA 92672		Entry Time/Date 8:30 am 03/12/2007	Permit Effective Date 05/21/2005
NPDES Permit Number: CA0108073	Order Number: R9-2005-0005	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor	Permit Expiration Date 05/11/2010
Name(s) of On-Site Representative(s), Title(s), Phone, and Fax Number(s) Robert Heckler (NPDES Engineer) phone: (949) 368-6816 Mary Jane Johnson (Environmental Manager) fax:		Notified of Inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Name of Responsible Official, Title, Phone and Fax Number H.W. Newton (Manager, Site Support Services) 5000 Pacific Coast Highway San Clemente, CA 92672 phone:		Contacted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Inspector(s) Lead Inspector: Carole Leong (PG Environmental, LLC) Back-up inspector: Charles Cheng (Regional Water Board)		Presented Credentials? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Weather Conditions at the Time of the inspection: Sunny			
Facility Receiving Water: Pacific Ocean			
<p align="center">Overview of Areas Evaluated During Inspection</p> <p align="center"><i>S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated</i></p> Permit: S Flow Measurement: S Operations and Maintenance: S Records and Reports: <input checked="" type="checkbox"/> U Self Monitoring Program: <input checked="" type="checkbox"/> M Solid Waste Handling and Disposal: N Facility Site Review: S Compliance Schedules: N Pretreatment (POTWs Only): N Effluent and Receiving Waters: S Laboratory: S Stormwater: N			
Prepared By: Carole Leong (PG Environmental, LLC) on 03/22/2007 Reviewed By: Craig Chomiak (PG Environmental, LLC) on 03/23/2007			

Facility Narrative

On 3/12/2007, a USEPA contractor inspected the San Onofre Nuclear Generating Station (SONGS) Units 1-3 in San Clemente, CA. The primary purpose of the inspection was to determine the accuracy and reliability of the discharger's self-monitoring and reporting program. The primary on-site facility representative was Robert Heckler (NPDES Engineer). The weather at the time of inspection was sunny.

The following report combines compliance evaluation inspections for the three permitted units of the San Onofre Nuclear Generating Station (SONGS): Unit 1 - CA0001228 (issued 2/9/2000 and expired 2/9/2005) under Order No. 2000-04 has been administratively extended pending the cessation of discharge through Outfall 001 (see below); Unit 2 - CA0108073 issued 5/11/2005 under Order No. R9-2005-0005; and Unit 3 - CA0108181 issued 5/11/2005 under Order No. R9-2005-0006. No photographs were taken during the inspection due to facility security requirements.

SONGS is a nuclear-fueled electric power generating facility located within the boundaries of Camp Pendleton, a US Marine Corp Base. The facility is operated by the Southern California Edison Company (SCE).

The facility consists of two twin generating units, Unit 2 and Unit 3, with separate cooling systems. Unit 1, which is located adjacent to Units 2 and 3, is not producing electricity and is in the process of being decommissioned. SCE also operates a domestic sewage treatment plant inside the Unit 1 premises.

Decommissioning activities are expected to continue into 2008. SONGS Unit 1 is subject to Waste Discharge Requirements (WDRs) established by Order No. 2000-04, which expired on February 9, 2005. Rather than renewing the permit, the Order is being administratively extended until the facility notifies the Regional Water Board that the use of Outfall 001 is terminated. At that time, the Regional Water Board will consider rescinding Regional Order No. 2000-04. According to the facility representative, stop gates were installed in the Unit 1 intake and outfall structures in December 2006 and the facility ceased all discharges through Outfall 001 as of January 2007. Furthermore, the facility representative stated that beginning April 2, 2007, contractors are scheduled to begin pumping concrete slurry into the structures to permanently seal them. The project is expected to be completed by April 5, 2007.

UNIT 1

Currently, cooling water withdrawn at Unit 1 is used to remove waste heat generated by the spent fuel pond and to dilute the various low-volume waste streams still generated at the facility. Order Nos. R9-2005-0005 (Unit 2) and R9-2005-0006 (Unit 3) acknowledge the impending termination of flows from Unit 1 to Outfall 001 and the routing of up to 36.6 mgd of combined discharge flows from Unit 1 to Outfalls 002 (Unit 2) or 003 (Unit 3).

UNIT 1 DOMESTIC SEWAGE TREATMENT PLANT

Integrated Performance Consultants (IPC) is under contract to operate the Unit 1 sewage treatment plant. Domestic wastewater generated at SONGS receives treatment at either the SONGS Unit 1 sewage treatment plant or at the Mesa Facility Complex Sewage Treatment Plant (Mesa Plant). The Mesa Plant serves as a collection point for sewage generated at support buildings as well as housing and campground facilities used by temporary employees during refueling operations. The Mesa Plant is permitted to treat and discharge waste directly to the Pacific Ocean but is most often used as temporary storage for sewage generated at the Mesa complex. Acting as an equalization basin, waste is stored at the Mesa Plant during the day and then pumped to the SONGS Unit 1 Sewage Treatment Plant in the evening. This mode of operation provides a constant flow to the Unit

1 Sewage Treatment Plant. The combined sanitary waste stream from the facility is permitted to discharge 0.16 million gallons per day (mgd).

The Unit 1 sewage treatment consists of grinding, flow equalization, biological treatment with activated sludge and secondary clarification. The plant consists of a north and south train. According to the facility representative, flow is normally directed to the north train. The treated effluent is routed to Outfall 002 or 003 for discharge to the Pacific Ocean.

UNITS 2 and 3

Unit 2 and Unit 3 are virtually identical and are subject to Waste Discharge Requirements established under Order No. R9-2005-0005 and Order No. R9-2005-0006, respectively.

Units 2 and 3 have a boilerplate rating of 1150 MWe each and are currently active. The two units share a similar configuration (mirror images) and operational processes. The two active units employ once-through cooling water systems, withdrawing cooling water from the Pacific Ocean and discharging it back to the ocean. Effluent from both units consists primarily of once through cooling water, with small volumes of other waste streams. The effluent from Units 2 and 3 are discharged to the Pacific Ocean through individual ocean outfalls (Outfalls 002 and 003 respectively). The main condenser cooling water systems associated with each unit are automatically chlorinated six times a day for 18-minute intervals with sodium hypochlorite solution.

A series of large pumps pass 1,219 mgd of seawater through the condenser of each plant. During this circuit, a number of in-plant waste streams are co-mingled with the cooling water flow. These include regeneration water from water purification systems, wastewater plant influent, and the waterside of an oil water separator. Other low-volume wastes are routed to the condenser cooling water system prior to discharge to the ocean outfalls. These discharges are periodic and only occur during unusual conditions such as maintenance outages. These waste streams are generated from the following operations/processes: blowdown processing, makeup demineralizer, radwaste system plant drains, steam generator blowdown, hotwell overboard, intake structure sump, concrete cutting water, and thermophilic digester.

Each unit maintains three permitted outfalls. The main outfall (identified as 002 for Unit 2; 003 for Unit 3) discharges wastewater from the once-through cooling water system and other in-plant wastestreams. The discharge points are located approximately two miles offshore at a depth of approximately 39 - 49 feet. The outfalls use extensive diffuser structures several thousand feet in length, thereby maximizing mixing upon release. The fish return outfall (identified as 004 for both units) discharges live fish and other aquatic organisms diverted from the intake screens via a discharge point located approximately 1,000 feet offshore. Discharge from this outfall is periodic and does not contain wastewater from any other facility source. The third outfall (identified as 005 for both units) is used for emergency cooling operations only. Discharge from this outfall occurs across the beach immediately in front of the facility.

In addition to the above outfalls, the orders establish effluent limitations and monitoring requirements for internal outfalls, identified with the letters A-K. (For example 001-A is Unit 1 sewage treatment plant effluent; 003-C is Unit 3 blowdown processing waste).

Discharge Monitoring Reports (DMRs) for the period July 2006 through February 2007 were reviewed as a component of this inspection. The review included a comparison of reported monitoring results versus requirements and limitations contained within the permit. No effluent exceedances were identified. The DMR evaluation also included a comparison of data points reported in the DMRs submitted to the Regional Water Board against the laboratory bench sheets documenting the actual analytical results from each Unit.

Major Findings

Records and Reports

Order No. 2000-004 (regulating discharges from the Domestic Sewage Treatment Plant) requires that records of monitoring information shall include the date and time of measurement or analysis, and the name of the individual(s) who performed the test or measurement. (Attachment C - State and Federal Standard Provisions. D.2. Standard Provisions - Records)

Neither the time of analysis nor the name of the analyst(s) performing the analyses is included on the monitoring results submitted by the contract laboratory. When informed of the permit requirements, facility representatives stated that they would work with the contract laboratory to ensure that permit requirements are met.

Laboratory

Order No. 2000-004 (regulating discharges from the Domestic Sewage Treatment Plant) requires that monitoring results be conducted according to test procedures under 40 CFR Part 136. (Appendix C – State and Federal Standard Provisions. C.2. Standard Provisions - Monitoring)

The 15-minute maximum holding time for pH analysis specified under 40 CFR Part 136 is exceeded on treated sewage effluent samples. Treatment plant effluent samples are collected by facility staff and transported to a contract laboratory for analysis. According to facility representatives the travel time to the contract laboratory is approximately one hour, and that laboratory personnel analyze the samples immediately upon receipt. There is no documentation to verify the time of analysis.

Facility representatives stated that logistically, it isn't feasible to transport a sample to the in-house laboratory within the approved holding time and that the only way to meet the holding time would be to set up a test station at the sample collection point.

PERMIT

OVERALL RATING S

INSPECTED ITEM	EVAL
1. Current copy of permit available.	S
2. Correct name and address of permittee.	S
3. Facility as described on permit.	S
4. a. Notification given to RWQCB of process/production modifications, collection system expansions, etc. that impacted quality/quantity of discharge or changes to the facility or increased discharge.	S
b. Permit modification received, if required, prior to changes.	N
5. Recent permit modifications, amendments, or compliance orders on file.	S
6. Number of discharge outfalls matches those identified in the permit.	S
7. Name of receiving waters listed correctly in the permit.	S
8. Permit status (i.e., current, expired, or extended).	Current
9. Permit renewal application submitted to the RWQCB at least 180 days prior to the expiration date.	N
<p>Notes:</p> <p><i>Unit 1 - CA0001228 (issued 2/9/2000 and expired 2/9/2005) has been administratively extended pending the cessation of discharge through Outfall 001;</i></p> <p><i>Unit 2 - CA0108073 (issued 5/11/2005 and expires 5/11/2010) under Order No. R9-2005-0005 is current; and</i></p> <p><i>Unit 3 - CA0108181 (issued 5/11/2005 and expires 5/11/2010) under Order No. R9-2005-0005 is current.</i></p>	

RECORDS AND REPORTS

OVERALL RATING U

INSPECTED ITEM	EVAL
1. NPDES records maintained for the required time period (5 years).	S
2. a. Spills and bypasses were reported and documented as required by the permit. b. Follow-up written documentation given as required by the permit (within 5 days).	N
	N
3. Discharge Monitoring Report (DMR) evaluation: a. The responsible person or designee signs and certifies the DMR. b. The facility monitors more frequently than required by the permit (Yes or No). c. All data collected are summarized on the DMR. d. Data reported on DMR is consistent with analytical results. e. Coliform concentrations calculated as required by the permit (e.g., median, geometric mean). f. Numerical values for the minimum detection limits are reported on DMR when laboratory reports "Not Detected" or "0" (e.g., if MDL=3, report "<3" on DMR). g. "Less than" values properly carried through loading calculations. h. Flow measurement period used for loadings calculations brackets the sampling period. i. Effluent loading calculated with effluent flow, if available. j. Number exceeding (N.E.) properly reported on all DMRs and annual reports.	
	S
	No
	S
	S
	S
	S
	S
	N
	S
4. Reports completed in time frame and frequency required by the permit (not all reports required for all facilities): a. Discharge Monitoring Reports b. Biosolids Monitoring Reports c. Biosolids Management Reports d. CSO and/or Inflow/Infiltration (I/I) Reports e. Compliance Schedule Reports f. Pretreatment Reports g. Other:	
	S
	S
	S
	N
	N
	N
5. Sampling and analytical records (for water and biosolids) include: a. Date, times, and location of sampling b. Names of individuals performing sampling c. Analytical methods d. Results of analyses e. Dates of analyses f. Time of analysis, as necessary, to verify holding times g. Analysts' names or initials h. Instantaneous flow at grab sample stations, if required	
	S
	Yes
	S
	S
	S
	U
	S

RECORDS AND REPORTS

OVERALL RATING U

INSPECTED ITEM	EVAL
<p><i>Compliance samples collected from the Unit 1 and Mesa Sewage Treatment Plants are analyzed by an ELAP-certified contract laboratory. The samples, which are transported to the contract laboratory by facility representatives, are normally delivered to the laboratory approximately one hour after sample collection.</i></p> <p><i>5f. The reports of analysis submitted by the contract laboratory do not include the time of analysis. The facility representative stated that the contract laboratory conducts the analysis for pH immediately upon sample receipt.</i></p> <p><i>5g. The inspectors observed that the reports of analysis submitted by the contract laboratory do not include the name of the analyst(s) performing the test.</i></p>	
<p>6. Plant records include:</p> <ul style="list-style-type: none"> a. Daily plant operational records or log book b. Equipment maintenance records and schedules c. CSO/lift station check records or log book d. Records of auxiliary power checks e. Spill Prevention Control and Countermeasure (SPCC) plan f. Pollution Prevention Plan (P3) g. Influent and effluent flow measurement records maintained for the past three years h. Other: 	<p></p> <p>S</p> <p>S</p> <p>N</p> <p>N</p> <p>N</p> <p>S</p> <p>S</p> <p>N</p>
<p>7. All required records and reports were organized and available for inspection.</p>	<p>S</p>
<p>Notes:</p> <p><i>This section is rated unsatisfactory because of Findings 5f and 5g.</i></p>	

FACILITY SITE REVIEW

OVERALL RATING S

INSPECTED ITEM	EVAL
1. All treatment units and supporting equipment are in service and mechanically functioning properly.	S
<p><i>The Unit 1 Domestic Sewage Treatment Plant is comprised of two parallel trains (North and South) which consists of the following:</i></p> <ul style="list-style-type: none"> - grinder - flow equalization basin - activated sludge basin - clarifier <p><i>Normally, the North train is used and the South train is in standby mode.</i></p> <p><i>Sewage sludge is trucked to Santa Paula, CA for processing approximately once every six weeks.</i></p>	
2. Hydraulic and organic loadings are consistent with the fact sheet and plant design criteria.	
a. Are there signs of overloading to the facility and collection system, including I&I and septage loading?	S
3. Peak flows remain within the established plant capacity.	S
a. If flows have exceeded capacity, has the RWQCB been notified?	N
4. Lift stations are properly monitored, have a back-up power source and are not subject to chronic spills and/or overflows.	N
5. Odors are adequately controlled, resulting in limited complaints.	S
6. Residual chlorine monitoring is well documented and sampling/monitoring is representative of the discharge.	S
a. If UV system is used, the dosage intensity, tubes, and alarms are adequate, maintained and documented.	N
7. Housekeeping procedures are adequate to prevent release of pollutants to the environment:	S
a. Adequate dikes and secondary containment	S
b. Spill containment and clean-up	S
c. Signs of spillage to soil, groundwater, or surface water	S
d. Stormwater and leachate management from storage piles	S
e. Leaking pipes, pumps, etc.	S
f. Drum and chemical storage areas	S
g. Minimization of pollutants entering storm water outlets	S
h. Other open dumps or debris piles	S
8. Signs of tank deterioration and/or settlement.	S
9. Safety concerns are present that may interfere with the proper operation, maintenance, and/or monitoring.	S
10. Material Safety Data Sheets are available for stored chemicals.	S

FACILITY SITE REVIEW

OVERALL RATING S

INSPECTED ITEM	EVAL
11. Equipment is available for spill clean-up and containment.	S
<i>Notes:</i>	

EFFLUENT AND RECEIVING WATERS

OVERALL RATING S

INSPECTED ITEM	EVAL
1. Recent DMR history (last 9 months) (outfall number(s) 001, 002, 003): a. Violations of discharge limits b. Spills/bypasses c. Fish kills or other receiving water impacts d. WET testing results are in accordance with permit e. If effluent violations have been identified, what actions has the facility taken to eliminate or reduce their recurrence?	S S S S S
2. DMR spot checks conducted: <u>December 2006</u> <u>January 2007</u> <u>February 2007</u> a. Internal lab sheets and contract lab results properly transferred to DMRs b. Monthly average, weekly, maximum, etc., values correctly calculated per the permit c. Influent and effluent loadings reported d. DMR is accurate and complete for each outfall	S S S S
3. Appearance of effluent during inspection: a. The effluent was viewed during the inspection b. Excessive foam, scum or sheens present c. Cloudy and/or color d. Excessive solids	No N N N
4. Appearance of receiving water(s) during inspection: a. The receiving water(s) was viewed during inspection b. Distinctly visible foam or sheens on receiving water(s) c. Biosolids beds or deposits of solids below discharge point(s) d. Distinctly visible plume from discharge(s) to receiving water(s) e. Discharge creates objectionable odor at or near receiving water(s)	No N N N N
<i>Effluent from Unit 2 and Unit 3 are discharged to the Pacific Ocean through underwater diffusers several miles offshore and at depths ranging from 39-49 ft.</i>	
Notes: 	

FLOW MEASUREMENT

OVERALL RATING S

INSPECTED ITEM	EVAL
5. Weirs: a. Approach channel is straight for at least 10 times the maximum head height. b. Flow in the approach channel is well distributed across the channel and free of turbulence, boils, or other disturbances. c. Solids accumulation in the bottom of the approach channel. d. Weir crest is located at least two times the maximum head height off the floor of the flow channel. e. The weir plate is level, plumb and without distortions. f. Weir is beveled on the downstream side if the plate is > 1/8 inch thick. g. No leakage around the weir plate. h. Measuring point located at least 3 times the maximum head height behind (upstream of) the weir. i. There is free-fall and access for air below the nappe of the weir, i.e., water doesn't cling to the weir plate. j. Weir sized properly to measure the existing range of flows. k. Proper flow tables being used; weir type and size.	 N N N N N N N N N N N
6. Secondary flow device properly installed and maintained, and operating without interference from foam, turbulence, webs, etc.	N
7. Date of last flow meter calibration: <u>05/13/2006</u> Performed by: <u>In-house technician</u>	
8. Calibration checks by plant personnel routinely performed.	S
9. Calibration records (external and internal checks) maintained.	S
Notes: 	

SELF-MONITORING PROGRAM

OVERALL RATING M

INSPECTED ITEM	EVAL
1. Sampling locations, type, methods, and frequencies conform to the NPDES permit for all required samples (including influent, effluent, biosolids, receiving water, etc.).	S
2. Sampling locations and methods provide representative samples: a. Grab samples collected during peak flow conditions, not low stress conditions. b. Composite sampling procedures comply with the permit (time vs. flow weighted).	S S
3. Automatic samplers and other sampling equipment are properly cleaned.	N
<i>Automatic composite samplers are not used at the facility.</i>	
4. Samples are preserved using methods listed in 40 CFR, Part 136 (e.g., chilled, acidified).	S
5. Sample containers are listed in 40 CFR, Part 136.	S
6. Chain-of-custody is maintained and documented.	S
<i>Chain of custody records for samples analyzed by the in-house laboratory are maintained in a computer database. The information is entered directly into the computer and no chain of custody forms are filled out. Separate chain of custody forms are filled out for samples that are sent to outside laboratories for analysis.</i>	
7. Samples are taken using the approved protocols: a. Coliform sample taken directly into sterilized container. b. BOD samples taken prior to disinfection or reseeded. c. Oil and grease collected directly into a glass container.	N N S
8. pH and/or residual chlorine measured in situ or within 15 minutes of sample collection.	U
<i>Samples for pH analysis on the Unit 1 Domestic Sewage Treatment Plant effluent are analyzed by an outside contract laboratory. According to the facility representatives, the travel time from SONGS to the contract laboratory is approximately one hour.</i>	
<i>Notes: This section is rated marginal because the inspector does not believe that Finding No. 8 is significant enough to downgrade the entire section to unsatisfactory.</i>	

LABORATORY

OVERALL RATING S

INSPECTED ITEM	EVAL
8. Contract laboratory used for NPDES compliance analyses? Laboratory Name: <u>Nautilus Environmental, LLC</u> Visited: No Address: <u>5550 Morehouse Dr Suite 150, San Diego, CA, 92121</u> Phone: <u>(858) 587-7008</u> Parameters: <u>Toxicity</u>	S
<i>Sierra Analytical Laboratory 26052 Merit Circle Suite 105 Laguna Hills, CA Parameters: pH, TSS, Turbidity, O&G (Treated wastewater from Unit 1 sewage treatment plant); Priority Pollutants</i>	
9. EPA-approved analytical procedures are identified on contract lab report.	S
10. Holding times met by contract laboratory.	U
<i>The holding time for pH analysis on treated wastewater effluent exceeds 15 minutes. See Self Monitoring Program Section and Major Findings for additional information.</i>	
<i>Notes: This section is rated satisfactory because the issue of holding time was already addressed in the self monitoring section.</i>	

OPERATIONS AND MAINTENANCE

OVERALL RATING S

INSPECTED ITEM	EVAL
1. Preliminary treatment units (bar screens, comminuters, grit channels, etc.) properly maintained with wastes properly disposed.	S
2. Adequate oxygen maintained in aerated treatment systems.	N
3. No operational problems caused by hydraulic "short-circuiting" in treatment units.	S
4. Biosolids wasting/return rates adequate to maintain system equilibrium.	S
5. Operations and maintenance manual and supporting information organized and maintained for use: a. Plant operations and maintenance manual b. Equipment manuals c. Plant engineering drawings d. Collection system drawings available or in development e. Maintenance records/costs	S N N N S
6. Routine and preventative maintenance items are scheduled and performed on time.	S
7. The amount of maintenance activities and parts in back-log is acceptable.	S
8. Operational problems contributing to plant upset, excessive odors, effluent violations, etc.	S
9. Level of operator certification as required by the permit and staffing level as specified in the operations and maintenance manual.	S
<i>An outside contractor, Integrated Performance Consultants (IPC) operates the Unit 1 sewage treatment plant with 2 operators. The facility is staffed intermittently. No representatives from IPC were present during the inspection.</i>	
10. Auxiliary power available as required by the permit and operates the necessary treatment units.	N
11. Alarm systems for power and equipment failure.	S
<i>The facility is alarmed only with respect to high water levels.</i>	
12. Treatment control procedures are established for emergencies.	S
13. Hydraulic surges are handled without excessive solids wash-out or bypasses.	S
14. Spare pumps and parts are readily available.	S
15. Facility appears to be well operated and maintained.	S
Notes:	



AUG 29 2007

Mr. John Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Ct, Suite 100
San Diego, California 92123
NCR: 13-0088.01:ccheng

SUBJECT: Closure request for July 31, 2007 Notice of Violation and Required Technical Report NPDES Compliance Inspection for NPDES Order Numbers 2000-04, R9-2005-0005 and R9-2005-0006, NPDES Permit Numbers CA0001228, CA0108073, and CA0108181 for the San Onofre Nuclear Generating Station

Dear Mr. Robertus:

San Onofre is requesting closure of the above violations because SONGS is in full compliance as detailed below:

Violation 1. Missing the time of analysis and the name of the analyst(s) performing the analysis on monitoring results submitted by the contract laboratory, which are required per section D.2. of the permit.

Corrective Action: The purchase order with our contract laboratory, Sierra Analytical Laboratories, was changed to require that all lab reports submitted to us by the laboratory include the analysts name and time of analysis.

Violation 2. The 15-minute maximum holding time for pH analysis specified in 40 C CRF Part 136 is exceeded on sewage effluent samples.

Corrective Action: The station will no longer be sending pH samples to an offsite lab for analysis. The station is now analyzing pH using a pH meter nearby within the required 15 minute time frame as required by 40 CFR Part 136.

If you have any questions about these issues, you can contact Robert Heckler at (949)-368-6816.

Sincerely,


Mary Jane Johnson
Manager, Site Support Services

cc: J. Reilly
M. J. Johnson
O. Flores
D. W. Kay
R. Tom
P. Tennant
R. K. Heckler
IDB NPDES