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SUBJECT: Justifies mod to NUREG-0472 Items 3.b & 5 re radiological
 environ monitoring program.Arid climate curtails reliable
 groundwater & broadleaf sampling.Samples will be taken from
 well water & local vegetation.

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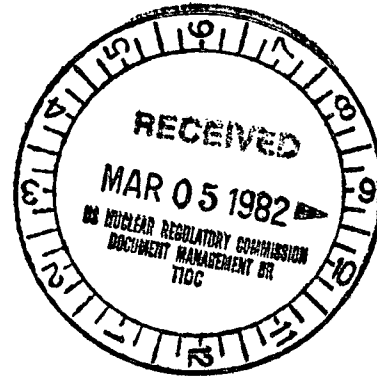


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Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station
Unit 2

Standard Radiological Effluent Technical Specifications for PWR's (NUREG-0472) requires in Table 3.12-1, Radiological Environmental Monitoring Program, that periodic sample collection and analyses be performed on "ground water," item 3.b, as well as on "broad leaf vegetation," item 5.

As incorporated into the San Onofre Unit 2, Appendix A, Technical Specifications, however, Table 3.12-1 does not contain requirements for monitoring "ground water" nor "broad leaf vegetation." Justification for modification of the standard requirements is provided as follows in response to NRC Radiological Assessment Branch (Ms. Lynn O'Reilly) request:

Item 3.b - GROUND WATER - Due to the arid climate, there is no reliable surface ground water (creek, pond, etc.) in the vicinity of the plant. The drinking water samples required by item 3.C of Table 3.12-1 of NUREG-0472 are, however, taken from wells and will therefore serve to monitor ground water as well.

Item 5 - MILK PATHWAY - BROADLEAF VEGETATION - There are no dairy animals, and due to the arid climate, negligible broadleaf vegetation in the vicinity of the plant. However, such local vegetation as exists (e.g., grasses) will be sampled and analyzed to monitor this pathway.

If you have any questions regarding the above, please contact me.

Very truly yours,

KP Baskin

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