BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON )
COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY )
for a Class 104(b) License to Acquire, )
Possess, and Use a Utilization Facility as )
Part of Unit No. 1 of the San Onofre Nuclear )
Generating Station

DOCKET NO. 50-206

Amendment No. 79

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment No. 79.

This amendment consists of Proposed Change No. 78 to the Technical Specifications incorporated in Provisional Operating License No. DPR-13 as Appendices A and B. Proposed Change No. 78 is a request to delete Environmental Technical Specification 3.1.2a (1) C.2, "SETTLING PLATES."

In the event of conflict, the information in this

Amendment No. 79 supersedes the information previously submit
ted.

In our opinion, the Proposed Change does not result in a condition which significantly alters the impact of San Onofre Unit 1 or the environment, and there is reasonable assurance that the health and safety of the public will not be endangered by the Proposed Change.

Pursuant to 10 CFR 170.22, Proposed Change No. 78, submitted as Amendment No. 79, is determined to be a Class III change. The basis for this determination is that the change addresses a single environmental issue and is deemed not to involve a significant environmental consideration.

Accordingly, the fee of \$4,000.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this 4th day of May , 1979

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

Βy

J. H. Drake Vice President

Subscribed and sworn to before me this

4th day of

of <u>may 1979 V</u>

Notary Public in and for the County of Los Angeles, State of California

Agnes Crabtree

OFFICIAL SEAL

AGNES CRABTREE

NOTARY PUBLIC - CALIFORNIA
PRINCIPAL OFFICE IN
LOS ANGELES COUNTY

My Commission Exp. Aug. 27, 1982

Charles R. Kocher James A. Beoletto Attorneys for Southern California Edison Company

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. A. Beoletto

Subscribed	on	this	 day	of	April	1979	•

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

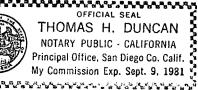
Mack E. Thomas Vice President Electric Division

David R. Pigott Samuel B. Casey Chickering & Gregory Attorneys for San Diego Gas & Electric Company

Subscribed and sworn to before me this

30th day of April

Notary Public in and for the County of San Diego, State of California Thomas H. Duncan



# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN )
CALIFORNIA EDISON COMPANY )
and SAN DIEGO GAS & ELECTRIC )
COMPANY (San Onofre Nuclear )
Generating Station Unit No. 1)

Docket No. 50-206

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of Amendment No. 79 was served on the following by deposit in the United States Mail, postage prepaid, on the  $\frac{7\text{th}}{2}$  day of  $\frac{1979}{2}$ .

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DESCRIPTION OF PROPOSED CHANGE AND ENVIRONMENTAL ANALYSIS PROPOSED CHANGED NO. 78 TO THE TECHNICAL SPECIFICATIONS PROVISIONAL OPERATING LICENSE DPR-13

This is a request to delete Technical Specification 3.1.2a(1)C.2, "Settling Plates" from the Appendix B Technical Specifications for San Onofre Unit 1.

## REASON FOR PROPOSED CHANGE

The purpose of the settling plate program is to supplement data obtained via the ETS benthic diving sampling program. That purpose has not been accomplished due to uncontrollable intermittent damage to the settling plate equipment over four years of the study despite the use of back-up systems. Little useful information has been gained due to data loss or reduction in data quality as a result of the damage. Accordingly, the technical specifications requiring performance of this study should be deleted.

#### EXISTING SPECIFICATIONS

Environmental Technical Specification 3.1.2a(1)C.2 "Settling Plates" currently reads as follows:

The benthic diving stations will be supplemented by settling plate data. At least 2 stations will have settling plates installed near the bottom. Settling plates will be placed at representative substrates near the area of influence of the thermal discharge and at a control station in Zone 6. Diving reconnaissance surveys will be conducted to establish the exact location of each station.

There are to be separate settling plates at each of the stations. Each plate will remain in place for a different length of time before being removed for study and replaced with a fresh plate. Three, 6, 9, and 12 month settling plates will be analyzed each year. Plates will be removed in sequential order. The benthic communities attached to the plates will be analyzed for species composition and diversity. For each station, a backup settling plate station within 25 feet will be provided to guard against loss of data due to vandalism or other means.

# PROPOSED SPECIFICATION

Environmental Technical Specification 3.1.2a(1)C.2 would appear as DELETED.

- 2 -EVALUATION AND BASIS FOR ENVIRONMENTAL FINDING The settling plate study is not a primary biological program element (1.e., fish, plankton, benthic) but was included to supplement the benthic diving survey. The study, in concept, provides information on the early life stages of benthic invertebrates and allows the collection of benthic data in areas and during periods of high turbidity where visual assessments of naturally occurring benthic communities are difficult. Experience at San Onofre during the past 4 years and as reported in the 1977 Annual Analysis Report has shown that competent assessments of the natural cobble/sand benthos can be made using the visual methods employed in the benthic diving survey. Little useful information on settling or development of organisms has been gained from the study despite the effort expended due to loss of data or data of questionable quality. The data loss stems from equipment damage which has been repetitive over a four-year study period and is probably related to the increase in activities near the Unit 1 discharge in the form of marine studies, sport and commercial fishing. The following is a chronology detailing the damage, loss and replacement of settling plates and racks over the four-year study period. First One-Year Study (May 1975 - May 1976) 6 months retrieval - October 16, 1975 -Prior to the scheduled retrieval period, damage was found to both racks holding the settling plates in Zone OA near the discharge. Most plates appeared undamaged but had been oriented at an abnormal angle and had been dangling near the bottom substrate for an unknown amount of time. No damage occurred in reference Zone 6. October 21, 1975 -Zone OA racks were repaired or replaced and "apparently" undamaged plates installed on new racks.

### Second One-Year Study (1976-77)

No damage

## Third One-Year Study (1977-78)

12 month retrieval - April 6, 1978 -

Prior to the scheduled plate collection interval, one Zone 6 rack was found to be destroyed.

April 25, 1978 -

One completely destroyed Zone OA rack was located; second rack not found.

June 5, 1978 -

The remains of two destroyed racks in Zone OA were located. In Zone 6 one intact rack was located from which two plates were retrieved.

June 6, 1978 -

Replaced both racks and all plates in Zone OA and one rack and all plates in Zone 6.

# Fourth One-Year Study (1978-79)

3 month retrieval - September 13, 1978 -

At the normal plate retrieval interval, only the remains of both Zone OA racks were found with a few damaged plates remaining. Both racks in Zone 6 were intact and plates were retrieved as usual.

The settling plate study has not accomplished its intended objectives.

The benthic diving study provides an adequate assessment of the natural cobble/sand benthos. Repeated data loss due to uncontrollable circumstances has prevented acquisition of useful information regarding settling and colonization of benthic organisms. Therefore, the settling plate program is not needed and should be discontinued.

NRC approval has previously been given to delete the preoperational settling plate study based upon the Unit 1 experience. The preoperational document, approved on July 6, 1978, indicated that this formal deletion request would be forthcoming from the Unit 1 program.

#### ENVIRONMENTAL FINDING

This action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

#### COST-BENEFIT ANALYSIS

have greatly exceeded the benefits gained. Discontinuation of the study will not create any environmental impacts or result in any significant loss of environmental data. Cost associated with the implementation of the study are estimated to be approximately \$18,000 per year. Deletion of the study will result in a savings of at least \$18,000 per year with no resultant cost or impact to the environment.

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