U. S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

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Report No.	50-2	206/79-05			• • • • • •	
Docket No.	50-2	206	License No	DPR-13	· · · · · · · · · · · · · · · · · · ·	Safeguards Group
Licensee: Southern California			dison Company			•
2244 Walnut Grove Av		nue				
• •	Rose	emead, California	91770			· · · · · · · · · · · · · · · · · · ·
-Eacility Nar	me:	San Onofre Unit	1		· · · · · · · · · · · · · · · · · · ·	
Inspection a	at:	Camp Pendleton,	California		·	
Inspection of	condu	cted: March 19-2	23, 1979		· · · ·	
Inspectors:	$\overline{\mathbf{Q}}$	P Curitis				6/1779
	J.	R. Curtis, Radiat A. Menslaw-se	// .			Date Signed
- 1	m J.	B. Baird, Radiat	ion Specialist			Date Signed
Approved By: F.A. Menslawski					Date Signed 6/1/19	
H. E. Book, Chief, Fuel Facility and Materials Safety Branch				Date Signed		
Summary:						

Inspection on March 19-23, 1979 (Report No. 50-206/79-05) Areas Inspected: Routine, unannounced inspection of the environmental monitoring and protection programs for the SONGS-1 license. The inspection included a review of the procedures, reports and QA audits related to the environmental protection and monitoring programs; a tour of sites used for environmental monitoring, observation of chemical release monitoring techniques; and discussions with licensee representatives who participate in various aspects of the program. The inspection involved 78 inspector-hours by two NRC inspectors.

<u>Results</u>: No items of noncompliance or deviations were identified.

RV Form 219 (2)

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DETAILS

Persons Contacted

- *J. Curran, Plant Manager, SONGS-1
- *R. Brunet, Superintendant, SONGS-1
- *M. Sullivan, Chemical/Radiation Protection Supervisor, SONGS-1
- *J. Mortensen, Chemical/Radiation Protection Engineer, SONGS-1
- G. Bagosian, Quality Assurance Supervisor, SCE, Rosemead
- *H. Chung, Quality Assurance Auditor, SCE, Rosemead
- R. Groves, Oceanographer, SCE, Research and Development, Rosemead
- D. Rundstrom, Marine Biologist, SCE, Research and Development, Rosemead
- R. Santusuosso, Supervisor, Instrumentation Systems, SONGS-1

C. Bostrom, Chemical/Radiation Protection Technician, SONGS-1

*Denotes those attending the exit interview.

2. Environmental Protection Program

A. Management Controls

The inspector interviewed members of the licensee's staff regarding any significant changes or proposed changes in the SONGS-1 Environmental Protection and Monitoring Program. There were no changes in the scope of the program; additional monitoring locations were being incorporated into the environmental surveillance program as a consequence of the addition of SONGS-2 and 3 preoperational requirements. These locations were associated with air sampling, thermoluminescent dosimetry (TLD) radiation monitoring and oceanographic parameter measurements.

B, Program Implementation

Responsibilities for implementation, data review and compilation, quality assurance, surveillance and corporate audits are distributed among members of the Operations staff, Chemical and Radiation Protection staff, outside contractors and the corporate quality assurance organization.

The inspectors interviewed individuals responsible for data review, contractor surveillance, and program audit, and observed individuals performing environmental monitoring duties.

Records of effluent releases, thermal discharges and reports of the radiological measurements of environmental samples were examined for completeness and consistency. The inspectors toured the offsite environmental monitoring locations. These locations are used for air sampling, soil and vegetation sampling and external radiation monitoring device (TLD) placement. At three sites, monthly and quarterly TLD packets for radiation level monitoring had been removed from their assigned locations by either unauthorized persons, animals or weather conditions. This has been a recurring problem at these locations and the licensee has initiated action to utilize a relatively tamper-proof, firmly attached, PVC container for the TLD monitors. These containers are scheduled for deployment with the next TLD exchange.

C. Procedures

Procedures for implementation of the program are incorporated into the SCE systems of Station Orders, Station Engineering Orders, and Chemical and Radiation Control Procedures. These documents are reviewed periodically; any resulting changes or revisions of the procedures are formally reviewed and approved by the Onsite Review Committee and other SCE review organizations.

The inspectors reviewed Station Orders and Procedures related to the Environmental Protection and Monitoring Program and observed licensee personnel performing duties related to these orders and procedures.

D. Audits

The inspectors discussed internal review and audits of procedural and Technical Specification requirements related to the environmental program.

A change in monitoring requirements of ETS 3.1.2.a(1)C.2 using settling plates was initiated by the licensee. The licensee has communicated with NRC Operating Reactors personnel at Bethesda HQ regarding the termination of an oceanographic study utilizing settling plates. Recently the plates used in the study have been destroyed or damaged by storms and boat traffic. Data from prior studies using these plates, designed to supplement the ETS bethnic diving and sampling program, was not considered conclusive or beneficial and as a consequence, the licensee has prepared a proposed TS change regarding this item. At the time of the inspection, it was in the final phase of in-house review prior to being submitted to NRC for action. (79-03-01 item regarding TS reporting requirement on this closed.)

The licensee maintains an extensive quality assurance program extending from the corporate management level to assessment of the quality control of contractor performance and environmental data reporting. The QA program has been applied to environmental monitoring matters and, based on inspection of audit records and discussions with licensee personnel, a thorough, sophisticated, in-house audit of the environmental protection program has been periodically conducted and continued quality assurance effort is expected.

No items of noncompliance or deviations were identified.

3. Non-Radiological Effluents

The inspectors observed sampling and measurement of chlorine concentration at the condenser outlet, discussed the applicable chemical release monitoring and control procedures and practices, examined records for effluent chemical and temperature monitoring, and discussed and examined chemical release records and reports submitted in connection with San Onofre NPDES permit. Gross chemical releases are determined on a monthly schedule based on monthly purchases and additions to the chemical inventory. The 1978 compilation of chemical releases was examined and quantities of specific chemicals released were well within the limits of the SONGS-1 Technical Specifications.

No items of noncompliance or deviations were identified.

4. Independent Inspection Effort

The inspectors toured environmental monitoring and sampling sites, including sites from which local crops and background samples are collected.

Smear samples of floor surfaces in and adjacent to the SONGS-1 radiochemistry laboratory were taken and counted for gross beta activity on the Region V NMC PC-55 proportional counters. All samples were within the backgound counting range of 18 to 32 counts per minute.

No items of noncompliance or deviations were identified.

5. Exit Interview

At the conclusion of the inspection, an exit interview was held with managerial staff and quality assurance personnel. The scope and findings of the inspection were reviewed and discussed. The licensee was informed that no items of noncompliance or deviations were identified.