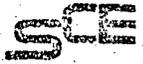


Southern California Edison Company



P. O. BOX 800

2. WALNUT GROVE AVENUE

CALIFORNIA 9

J. T. HEAD, JR.
VICE PRESIDENT

TELEPHONE
213-572-1472

April 19, 1979

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94596

Attention: Mr. R. H. Engelken, Director

Docket No. 50-206
San Onofre Unit 1

Dear Sir:

The purpose of this letter is to advise you that on two separate occasions in 1978 thirty-day written reports were not submitted to report the loss of quarterly benthic survey data. Environmental Technical Specification 5.6.3.b(3) of Appendix B to Provisional Operating License No. DPR-13 requires that we report within thirty days of occurrence of the event the loss of quarterly data (i.e., the loss of one sample per year).

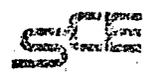
During the first and second quarterly benthic surveys in 1978, data could only be collected from one of eleven and five of eleven benthic stations, respectively, in accordance with Environmental Technical Specification 3.1.2.a(1). However, it was determined during the current annual audit of the activities required by the Appendix B Environmental Technical Specifications that this loss of data was not reported to the NRC.

Based on a review of the activities surrounding the loss of the subject quarterly benthic data, the data loss was generally due to unusually severe winter conditions existing from December 1977 to May 1978. Small craft or storm warnings persisted for several weeks at a time preventing sampling craft from leaving nearby harbors. During the intervals when storm warnings were down, visibility was too low to make visual assessments due to the previous intense land runoff and resuspension of sediments by high energy ground swells. The situation was further aggravated by the destruction of several sampling stations by the intense storms. Buoy marking systems were torn loose and lost, and permanently delineated hard bottom communities were buried by storm transported sediment. The data loss was not significant enough, however, to prevent assessment of the hard benthos for 1978. The occurrence actually serves to illustrate natural catastrophic phenomena which oftentimes greatly overshadows potential generating station effects.

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For instance, several hard bottom communities within the station transects had been studied in place over a three year period for changes in composition and distribution due to station operation. These communities had tended to remain relatively stable with only minor changes in composition due to seasonal oceanographic fluctuations. Some of these entire communities were then completely buried by longshore sediment transport during the abnormally severe conditions. This burial has also occurred to some extent during "normal" years. These events substantiate the fact that a large portion of the communities occurring on the rock/cobble bottom at San Onofre is ephemeral in nature and that a primary factor governing benthic organism distribution is natural sediment transport. This correlation will be discussed in detail in the 1978 Biological Analysis Report to be submitted to the NRC in July 1979.

Corrective action has included replacement of the buoy systems which permanently mark the sampling sites with stronger component systems in order to withstand continuous storms of the magnitude of those experienced during early 1978. The reportability of the loss of data has also been reviewed with cognizant organizations responsible for implementing the environmental monitoring programs.

Should you require additional information on this matter, please let me know.

Sincerely,

Attachment: Licensee Event Report 79-004

cc: Director, Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement (20)
✓ Director, Office of Management Information & Program Control (2)