JUL 6 1977

Docket Nos. 50-361
and 50-362

Southern California Edison Company
ATTN: Mr. K. P. Baskin, Manager
Operations Engineering
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Gentlemen:

Subject: San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, Proposed Preoperational Monitoring Program

We have reviewed the proposed preoperational monitoring program for the San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, as transmitted by your letter of March 23, 1977.

Our reply has been delayed pending discussions at our recent site visit with your staff regarding our assessment of the proposed program. Although a number of our concerns have been resolved by your latest revised submittal and our direct contact with your staff, there are several deficiencies which remain to be resolved.

One major concern is the lack of a data base and/or preoperational sampling program for ichthyoplankton. During the site visit, it was learned that the Marine Review Committee (MRC), chaired by Dr. Joseph H. Connell of the University of California at Santa Barbara, would be addressing the ichthyoplankton issue. We have been informed that the Committee would be funding, as of July 1978, a study by Dr. A. Barnett of Marine Ecological Associates to assess the distribution, abundance, and entrainment of ichthyoplankton at San Onofre, Unit No. 1. We believe that the MRC ichthyoplankton study, to be conducted by Dr. Barnett, will satisfy the noted deficiency. There is no need for SCE to initiate a duplicative effort; however, if this program is not supported by the MRC, as planned, SCE should initiate a similar ichthyoplankton study.

We are enclosing specific and general comments on the program which contain conditions for its approval. These comments were discussed with your staff at the site visit.

Enclosure 1

OFFICE ➤						
SURNAME ➤						
DATE ➤						

JUL 6 1977

Your proposed program for preoperational monitoring would be acceptable if (1) an ichthyoplankton study is implemented and (2) the attached conditions indicated in the comments are integrated into the program.

Should you have any questions regarding the above, please do not hesitate to contact Oliver D. T. Lynch, Jr., Project Manager, who can be reached by telephone on (301) 492-8438.

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Enclosures:
(1) Detailed Comments on SONGS-Unit Nos. 2 and 3
(2) Proposed Preoperational Monitoring Program

Sincerely,

Original signed by
W. H. Regan

Wm. H. Regan, Jr., Chief
Environmental Projects Branch 2
Division of Site Safety and Environmental Analysis

cc: Southern California Edison Company
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AQUATIC RESOURCES SECTION (ESB)
DETAILED COMMENTS ON SONGS - UNITS 2 & 3
PROPOSED PREOPERATIONAL MONITORING PROGRAM

Specific Comments

1. Page 10 - pH Monitoring - Correct error. It is our understanding that pH is to be taken bi-monthly.

2. Page 12 - Thermal Monitoring and Page 14 - Turbidity

   Add stations to Zone OB as this is the location of the discharge from Unit Nos. 2 & 3 (see General Comments No. 1 below).

3. Page 15 - Heavy Metals - Besides Fe levels, also add Cr to the investigations. Also, assess the background levels of these metals in the immediate area of the discharge.

General Comments

1. Add sufficient offshore monitoring stations in and around Unit Nos. 2 & 3 discharge as to statistically sample the area that will be effected by the plume of Unit Nos. 2 & 3. Because of the alternating long shore currents, it is felt that a minimum of 4 - 8 stations are necessary to assess natural background levels.

2. Coordinate the collection of water quality data so that all parameters are sampled within a two day period allowing for comparisons and, possibly, explanations of cause and effect relationships.

3. The monitoring of the intertidal zone seems to be more extensive than necessary. It appears that visual inspection would be sufficient, with biological sampling and laboratory analysis initiated if needed. However, once the construction apron is removed from Unit Nos. 2 & 3, a sampling program should be initiated to assess the effect of the added sand movement in the intertidal zone. Providing the data shows no significant effects, this program should terminate after all translocation of sand has occurred or after two (2) years.

4. We suggest that Unit No. 1 operational study and Unit Nos. 2 & 3 preoperational study be integrated into a more meaningful single program. Presently, these studies appear to be two separate programs; coordination of both studies would allow a more meaningful program with an economic incentive.

5. In our review process, we had difficulties in following the present numbering scheme for sampling stations; such difficulties may be compounded by the additional monitoring for Unit Nos. 2 & 3. With this in mind, the numbering scheme may have to be re-evaluated in order to result in a system in which sampling stations and quadrats for Unit Nos. 1, 2, & 3 will be more logically and systematically numbered.