

September 10, 2015

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: **Docket No. 50-361 and 50-362**  
**Notice of Violation of NPDES Permit**  
**San Onofre Nuclear Generating Station, Unit 2 and Unit 3**

- References: 1) Letter from Brian Metz, Southern California Edison to David Gibson, California Regional Water Quality Control Board San Diego Region, dated September 25, 2014
- 2) Letter from Ben Neill, California Regional Water Quality Control Board, San Diego Region, to Brian Metz, Southern California Edison, dated July 10, 2015

Dear Sir or Madam:

Appendix B, Section 3.2, of Operating License Nos. NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3 respectively, requires violations of the National Pollutant Discharge Elimination System (NPDES) Permit or State certification (pursuant to Section 401 of the Clean Water Act), to be reported to the NRC by submittal of copies of the reports required by the NPDES Permit or certification.

On September 15, 2014, during a review of the NPDES self-monitoring reports, SCE staff discovered that annual and semi-annual samples and required reports that were due in 2014 were not submitted on time to the San Diego Regional Water Quality Control Board. SCE verbally notified the offsite agency of the missed reports; including notification to the NRC of the offsite notification to an outside agency per 10 CFR 50.72(b)(2). A follow-up letter was sent to the California Regional Water Quality Control Board on September 25, 2014 (Reference 1) documenting the reports that were missing and the corrective actions that SCE had executed to ensure that the missed reporting noted in the letter would not occur in the future.

A Staff Enforcement Letter from the California Regional Water Quality Control Board to SCE SONGS dated July 10, 2015 (Reference 2) was received documenting the self-identified late reports (Reference 1) as a violation for submitting late reports. No response or additional action is required by SCE.

Additional details can be found in the enclosed referenced letters.

C 001  
NICK

There are no commitments in this letter or the enclosures.

If you have any questions please contact Mr. Mark Morgan at (949) 368-6745.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Morgan". The signature is fluid and cursive.

for

J. A. Kay

- Enclosures: 1) Letter from SCE to California Regional Water Quality Control Board,  
San Diego Region  
2) Letter from California Regional Water Quality Control Board,  
San Diego Region, to SCE

cc: M. L. Dapas, Regional Administrator, NRC Region IV  
M. G. Vaaler, NRC Project Manager, SONGS Units 2 and 3  
R. L. Kellar, NRC Region IV Branch Chief, Repository Spent Fuel Safety Branch  
S. Hsu, California Department of Public Health, Radiologic Health Branch

Enclosure 1

Letter from Southern California Edison to  
California Regional Water Quality Control Board,  
San Diego Region

September 25, 2014

Mr. David Gibson  
California Regional Water Quality Control Board  
San Diego Region  
2375 Northside Drive Suite 100  
San Diego, California 92108-2700  
IC: 13-0086.01

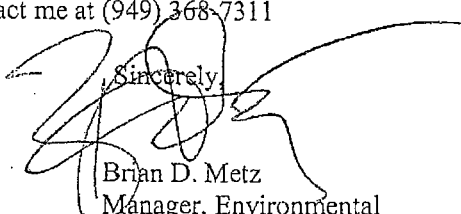
Subject: Follow-up report for the missed semi-annual (2013 second half; 2014 first half) and annual report (2013): Order No. R9-2005-0005 (NPDES Permit No. CA0108073) and Order No. R9-2005-0006 (NPDES Permit No. CA0108181).

Dear Mr. Gibson:

- On September 15, 2014, during a review of the NPDES self-monitoring reports, SCE SONGS environmental staff discovered that the following reports were not submitted and are now past due:
  - Unit 2 Semi-annual Report, 2013 second half
  - Unit 3 Semi-annual Report, 2013 second half
  - Unit 2 Annual Report, 2013
  - Unit 3 Annual Report, 2013
  - Unit 2 Semi-annual Report, 2014 first half
  - Unit 3 Semi-annual Report, 2014 first half
- The missed samples and associated reports are non-radiological in nature.
- The oversight appears to be due to the staff changes and lack of familiarization with program requirements. SCE is also performing a self-assessment to ensure that any gaps in procedure, reports and/or lack of clarity with respect to roles and responsibilities are promptly addressed.
- Interim corrective actions have been taken including the assignment of a SONGS experienced environmental manager to provide oversight and direction for compliance matters, including the NPDES monitoring and reporting requirements.
- SCE will submit the 2013 Annual Report with the summaries of the monthly and quarterly monitoring data that had been gathered for the 2013 year in both tabular and graphical format by October 16, 2014. No analytical data exists for the semi-annual reports or the annual report.
- Semi-annual and annual sampling have been completed during the week of September 25, 2014 and the results will be provided to the San Diego RWQCB upon receipt.
- SCE made verbal notification to Ben Neill on September 19, 2014.

If you have any questions please contact me at (949) 368-7311

Sincerely,

  
Brian D. Metz  
Manager, Environmental

cc: Ben Neill (SDRWQCB)  
John Brabec  
Kelli Gallion  
Paul Elliott Jr  
Paul Youngbae Ahn  
IDB - NPDES  
CDM

Enclosure 2

Letter from California Regional Water Quality Control Board,

San Diego Region

to Southern California Edison



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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## California Regional Water Quality Control Board, San Diego Region

*By Email Only*

July 10, 2015

Mr. Brian Metz  
Supervisor, Environmental Services  
Southern California Edison  
P.O. Box 128  
San Clemente, CA 92674  
[brian.metz@sce.com](mailto:brian.metz@sce.com)

In reply refer to:  
Place ID 257702:257703:Bneill

**Subject: Staff Enforcement Letter, 2013 through 2015 Self-Monitoring Reports (SMRs) for SONGS Unit 2 and 3, Order Nos. R9-2005-0005 and R9-2005-0006, NPDES Permit Nos. CA0108073 and CA0108181**

Mr. Metz:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the following self-monitoring reports (SMRs) and technical reports submitted between July 2013 and March 2015 for the aforementioned facility:

- Monthly SMRs - October 2013 through March 2015
- Quarterly SMRs - October 2013 through December 2014
- Semi-annual SMRs - July 2013 through December 2014
- Annual SMRs - 2013 through 2014

The following is a summary of the San Diego Water Board's findings:

1. **Violation – Late Report, Attachment D Section XIII.5**

a. The following reports were submitted past due:

- Monthly, August 2014
- Semi-annual, H2 2013 and H1 2014
- Annually, 2013

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HENRY AGARBANEL, CHAIR | DAVID GIBSON, EXECUTIVE OFFICER


2375 Northside Drive, Suite 100, San Diego, CA 92108-2700 | (619) 518-1990 | [www.waterboards.ca.gov/sandiego](http://www.waterboards.ca.gov/sandiego)



Please take steps to ensure that the violations noted above do not occur in the future. Pursuant to the California Water Code (CWC), the violations noted are subject to additional enforcement action(s) by the San Diego Water Board including a time schedule order, cease and desist order, cleanup and abatement order, imposition of administrative civil liability; referral to the district attorney for criminal prosecution, or referral to the attorney general. Administrative civil liability amounts that may be imposed by the San Diego Water Board under authority of CWC Section 13385 include up to \$10,000 per day, or up to \$10 per gallon for each gallon of waste discharged.

In the subject line of any response, please include the reference "Place ID 257702:257703:Bneill". For questions or concerns regarding this letter, please contact Ben Neill at 619-521-3376 or [ben.neill@waterboards.ca.gov](mailto:ben.neill@waterboards.ca.gov).

Respectfully,



Ben Neill, P.E.  
Water Resources Control Engineer  
Source Control Unit

Tech Staff Info & Use	
Order No.	R9-2005-0005
WDID	9 000000087
NPDES No.	CA0108073
Reg. Measure ID	133388 (R9-2005-0005)
Place ID	257702
Enforcement ID	402000
Violation(s)	992803; 992805; 992806; 992807

Tech Staff Info & Use	
Order No.	R9-2005-0006
WDID	9 000000088
NPDES No.	CA0108181
Reg. Measure ID	133389 (R9-2005-0006)
Place ID	257703
Enforcement ID	402000
Violation(s)	992804; 992808; 992809; 992810