

SEP 24 1975

Docket Nos.: 50-275  
and 50-323 ✓

Pacific Gas and Electric Company  
ATTN: Frederick T. Searls  
Vice President and General  
Counsel

77 Beale Street  
San Francisco, California 94106

Gentlemen:

The NRC staff is currently reviewing the Proposed Draft Environmental Technical Specification (ETS) for the Diablo Canyon Nuclear Power Plant. At the end of this review, we would like to meet with the appropriate personnel from PG&E to work out any disagreements in viewpoints. It now appears that such a meeting can be held in November of this year.

In order to maintain an orderly and timely schedule for this review, I believe it is advisable to alert you to some areas of these ETS's that already have been identified as requiring more than minor modification. These are as follows:

Section 2.1.1 Maximum Temperature Difference Across Condenser

The staff is not prepared to make judgments on this limiting condition for a  $\Delta T$  higher than 190°F until additional information is furnished regarding justification and potential impact on the receiving waters.

Section 2.1.2 Maximum Discharge Temperature

The staff is not prepared to void the need for such a specification until we have more information relating to recirculation of the discharge plume into the intake system.

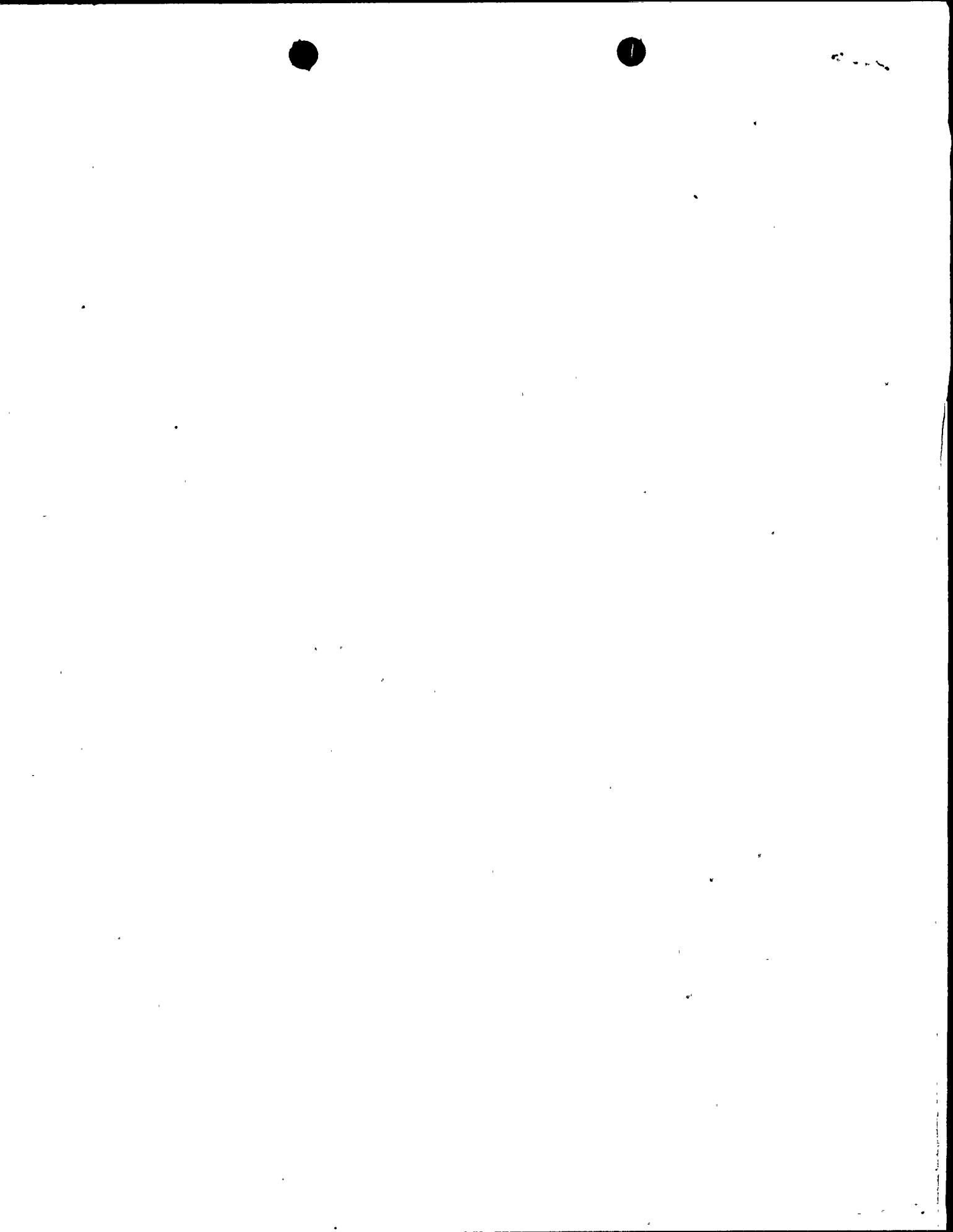
Section 2.1.5 Heat Treatment of Circulating Water System

The proposed ETS fail to distinguish between the need to use a  $\Delta T$  of 40° or 50°F or to prove that water quality criteria can be met if only one cooling-water system is operational.

*FS*

*FS-2*

OFFICE >	<i>FS</i>					
SURNAME >						
DATE >						



Section 2.2 Hydraulic

Since most of the background information for this limiting condition will not be available until testing of the cooling-water system can be resumed, the staff is not ready to void the need for this specification.

Section 2.3.1 Biocides

Although the staff recognizes that the proposed limiting condition conforms to the regulations of the State of California, the staff has stated, in its Final Environmental Statement, its position relating to the desirability of monitoring "total residual chlorine" rather than "free chlorine" alone.

Section 3.1.1(a)(1) Water Quality Surveys and  
Section 4.1 Thermal Plume Mapping

One of the staff's major concerns relating to the operation of this plant remains the difficulty in predicting the impact of the thermal discharge on the biota of Diablo Cove and the adjacent ocean environs. The staff believes these sections of the ETS must be written with sufficient detail to insure the plant's operation does not cause an unacceptable impact on the aquatic ecosystem.

Section 5

The staff has not received this section of the proposed ETS and, therefore has not had an opportunity to review your position on the matters involved.

The staff expects to receive, soon after October 1, 1975, the results of the thermal discharge tests that you performed with the physical model in Richmond, California. Although the overall validity and value of these results may be debatable, the staff expects this information to give further guidance on how we can achieve an accurate estimate of thermal impacts. Consequently, after the staff has had an opportunity to review these new data, I propose that representatives of PG&E and the NRC staff meet to develop further the criteria for an effective postoperational thermal monitoring program. At the same time, we can discuss any additional information you may wish to submit in relation to the various thermal limiting conditions (Sections 2.1.1, 2.1.2, 2.1.5).

OFFICE >						
SURNAME >						
DATE >						



1-1-1

Subsequently, we can meet again to discuss the acceptability of the entire Environmental Technical Specifications with the view of having this portion of the licensing process completed prior to the operating license hearing.

Sincerely,

Original signed by  
Gordon K. Dicker

Gordon K. Dicker, Chief  
Environmental Projects Branch 2  
Division of Reactor Licensing

cc: Mr. Philip A. Crane, Jr.  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, California 94106

Ms. Raye Fleming  
1746 Chorro Street  
San Luis Obispo, California 93401

Mr. W. J. Linblad, Project Engineer  
Pacific Gas and Electric Co.  
77 Beale Street  
San Francisco, California 94106

Mr. William P. Cornwell  
P. O. Box 453  
Morro Bay, California 93442

Andrew J. Skaff, Esq.  
California Public Utilities  
Commission  
350 McAllister Street  
San Francisco, California 94102

Mr. Gordon Silver  
322 S. Plymouth Boulevard  
Los Angeles, California 90020

Mr. Frederick Eissler, President  
Scenic Shoreline Preservation  
Conference, Inc.  
4623 More Mesa Drive  
Santa Barbara, California 93105

- DIST:  
✓ DOCKET FILES (ENVIRON)  
NRR Reading  
EP-2 Reading  
WRoss  
GDicker  
PKreutzer  
DMuller  
PSeiffert  
LHulman  
RBallard  
DAllison  
NRC-PDR  
LOCAL-PDR

Ms. Elizabeth E. Apfelberg  
1415 Cazadero  
San Luis Obispo, California 94301

Ms. Sandra A. Silver  
1315 Cecelia Court  
San Luis Obispo, California 93401

Mr. John Forster  
985 Palm Street  
San Luis Obispo, California 93401

OFFICE >	RL:EP-2	RL:EP-2				
SURNAME >	WROSS/WJR	GDicker				
DATE >	9/23/75	9/24/75				

