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January 5, 1981

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
San Onofre Nuclear Generating Station
Unit 1

The Environmental Technical Specifications (ETS) for Unit 1 at San Onofre Nuclear Generating Station require the licensee to perform extensive environmental monitoring programs. These ETS environmental monitoring programs have been conducted at San Onofre for six years. During that period, comprehensive analysis of all data collected indicates no significant environmental impacts. For the calendar year 1981, these programs are estimated to cost in excess of \$900,000.00.

Three proposed changes to the ETS (Nos. 84, 86 and 94) are currently pending NRC approval. Proposed Change Nos. 84 and 86 requested deletion of certain study requirements within Sections 4.3 and 3.1. Proposed Change No. 94, which supersedes Nos. 84 and 86, would revise the ETS by deleting the Limiting Conditions for Operation (LCO's) and related Environmental Monitoring Programs, by adding a reference to the National Pollution Discharge Elimination System (NPDES) permit and by revising the Administrative Controls accordingly. Proposed Change No. 94 was submitted to the NRC by letter dated October 15, 1980.

San Onofre, Unit 1 was shutdown in April, 1980, for refueling and remains shutdown while repair of the steam generators is performed. ETS environmental monitoring programs have continued in effect throughout this shutdown period even though there has been no discharge of thermal waste to the marine environment. Unit 1 is not expected to return to service until Spring, 1981.

Because Unit 1 is not operating, it is therefore requested that the NRC grant a temporary waiver of the environmental monitoring requirements as specified in the following ETS:

- 3.1 Nonradiological Surveillance
- 4.1 Chlorine
- 4.2 Fish Impingement
- 4.3 Entrainment

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Mr. Darrell G. Eisenhut

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This waiver is requested until Unit 1 is once again returned to normal operation. Prompt and positive action on this waiver request is expected to save the licensees about \$250,000.00 in the first quarter of 1981.

In lieu of the requested waiver, prompt favorable NRC resolution of ETS Proposed Change No. 94 would be preferred and would likewise result in the savings of substantial expenditure of funds for 1981.

Please contact me if you have any questions concerning this request or require additional information.

Sincerely,

KP Bushman