

June 2, 1993

California Regional Water Quality Control Board  
San Diego Region  
9771 Clairemont Mesa Boulevard, Suite B  
San Diego, California 92124-1331

Attention: Mr. Arthur L. Coe

Dear Mr. Coe:

Subject: NPDES Monitoring Report  
San Onofre Nuclear Generating Station, Unit 2

The NPDES Discharge Monitoring Report (DMR) for San Onofre Unit 2 covering the month of April is submitted in accordance with the requirements of Order No. 85-11 (NPDES Permit No. CA0108073). A summary of the generating unit's status and significant analytical results is provided below.

The unit was in operation all month and all sampled water sources were found to be within permit limits.

An investigation was recently conducted in which a discrepancy in analytical technique was found. The current method used to determine total residual chlorine concentration per 40 CFR part 136 is the Environmental Protection Agency (EPA)-approved Hach N-diethyl-p-phenylenediamine (DPD) colorimetric test. During the investigation it was noted that 40 CFR 432.11 Steam Electric Power Generating Point Source Category requires a different EPA-approved method, stating:

"The term total residual chlorine (or total residual oxidants for intake water with bromides) means the value obtained using the amperometric method for total residual chlorine described in 40 CFR part 136."

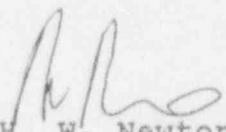
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Upon discovery of the discrepancy, we took immediate actions to reinstate the amperometric titration method for total residual chlorine analysis for future NPDES reporting. Edison believes the DPD test is equivalent or better than the amperometric test (due to greater reliability and reproducibility of results). This issue also applies to Unit 3 and the requirements of Order No. 85-13 (NPDES Permit No. CA0108181).

Pursuant to Order No. 85-11, Reporting Requirement 12, the following representative has prepared and is authorized to sign the reports required by this order: Robert K. Heckler, Environmental Engineer.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in the attached document, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

  
H. W. Newton  
Manager, Site Support Services

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Enclosure

cc: Environmental Protection Agency, Region IX