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 FACIL: ~~50-361~~ San Onofre Nuclear Generating Station, Unit 2, S. Cal 05000361
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 MOORE, V.A. Assistant Director for Environmental Projects

SUBJECT: Discusses schedule by which marine environ monitoring program was conducted. Fact tht plankton & benthic-diving surveys were not conducted until 3rd quarter 1978 not believed to have resulted in loss of significant data.

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K. P. BASKIN
MANAGER, GENERATION ENGINEERING

February 2, 1979

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Director, Office of Nuclear Reactor Regulation
Attention: V. A. Moore, Assistant Director
Environmental Projects
Division of Site Safety and
Environmental Analysis
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

The Preoperational Monitoring Program for San Onofre Nuclear Generating Station, Units 2 and 3, which has been approved by the Nuclear Regulatory Commission, includes a statement in the introduction which indicates that the programs will be initiated at least two years prior to, and will terminate at the time of, initial operation of Unit 2.

This letter is to advise you that a portion of the Marine Environmental Monitoring Program did not commence exactly two years prior to scheduled initial operation as stated in the Preoperational Monitoring Program. The quarterly plankton and benthic-diving surveys were not performed in the Second Quarter of 1978.

The first preoperational plankton survey could have been conducted in the latter part of May, but was delayed in order to coincide with the next Unit 1 Environmental Technical Specification (ETS) plankton survey in July. This step was considered necessary in order to combine the Unit 1 ETS and Units 2 and 3 preoperational studies into a single, more meaningful program per NRC request (letter to SCE from Wm. H. Regan, NRC, dated July 6, 1977). The biological consultant experienced procurement problems with the manufacture of new pump type, which delayed system readiness prior to May, 1978. The new pump system insures minimal damage to zooplankton during passage. This reduces sampling time considerably by eliminating in-line filtering in front of the pump.

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The first preoperational benthic survey was performed in July, 1978. Efforts to begin the survey prior to that time were hampered by inclement weather conditions and persistent low visibility, which substantially extended the length of time required to complete the following preliminary activities:

- o Complete a side-scan sonar survey in order to produce a map of substrate habitat types and extents in the study areas.
- o Diver reconnaissance to locate representative and comparable areas for the permanent stations.
- o Testing and development of the point contact method, including lab comparisons, field testing, and comparison with previous methods.
- o Installation of permanent stations (hardware).

The initiation of the plankton and benthic-diving surveys in the Third Quarter, rather than the Second Quarter, of 1978 is not believed to have resulted in a significant loss of data. This letter is to advise you of this, so that there is no misunderstanding in the future.

If you have any questions on this matter, please call me on (213) 572-1401, or Dennis Cox on (213) 572-2641.

Very truly yours,



K. P. Baskin