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 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362

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 NANCY, F.R. Southern California Edison Co.
 RECIPIENT NAME: RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: NPDES noncompliance notification: during NPDES insps on 901119 & 20, discovered that concentrations of grease & oil exceeded at Unit 2 & concentrations of silver in combined discharge exceeded at Unit 3. Sampling will be performed.

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Southern California Edison Company

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July 19, 1991

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F. R. NANDY
MANAGER, NUCLEAR LICENSING

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

Gentlemen:

Subject: Docket No. 50-361, 50-362
Report of NPDES Permit Violation,
NPDES Compliance Evaluation Inspections,
San Onofre Nuclear Generating Station, Unit 2 & 3

- Reference: 1) June 4, 1991, letter from A. L. Coe (California Regional Water Quality Board) to H. Newton (SCE), Subject: NPDES Compliance Inspection - San Onofre Nuclear Generating Station, Unit 2.
- 2) June 4, 1991, letter from A. L. Coe (California Regional Water Quality Board) to H. Newton (SCE), Subject: NPDES Compliance Inspection - San Onofre Nuclear Generating Station, Unit 3.

Section 3.2 of Appendix B to each of Facility License No. NPF-10 and Facility License No. NPF-15 for San Onofre Nuclear Generating Station (SONGS) Unit 2 and Unit 3, respectively, requires Southern California Edison (SCE) to report violations of the National Pollutant Discharge Elimination System (NPDES) permit. This letter reports two NPDES permit violations, one for each of SONGS Units 2 and 3 identified by the California Regional Water Quality Control Board during its NPDES compliance evaluation inspections conducted on November 19 and 20, 1990.

The NPDES compliance inspection for Unit 2 included analysis of samples collected from four locations; the Intake Sump low volume waste, the Steam Generator low volume waste, the Oily Waste Separator low volume waste, and the Combined Discharge to the ocean outfall. The NPDES permit limits the effluent instantaneous concentration of grease and oil to 20 mg/l. The NPDES compliance inspection report (reference 1) indicated an instantaneous oil concentration of 32 mg/l in the Intake Sump low volume waste, which exceeds the NPDES limit by 12 mg/l.

Southern California Edison (SCE) believes that the analytical results of the above sampling may be erroneous, since there is no normal source of grease and oil in the sump and historical sample results have not indicated high grease and oil concentrations. However, during the period from July 1, 1991 until

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July 19, 1991

September 30, 1991, SCE will perform weekly sampling and analysis of the intake structure sump for grease and oil.

The NPDES inspection report for Unit 3 included analysis of samples collected from three locations; the Intake Sump low volume waste, Steam Generator low volume waste, and the Combined Discharge to the ocean outfall. The NPDES permit limits the effluent instantaneous concentration of silver in the Combined Discharge to 0.0479 mg/l. The NPDES compliance report (reference 2) indicated an instantaneous silver concentration of 0.153 mg/l in the Combined Discharge, which exceeds the NPDES limit by 0.105 mg/l.

SCE believes this analytical result to also be erroneous since a review of SCE's records has not revealed any activity that could have caused silver to be present in the Unit 3 Combined Discharge. There is only very limited use of silver at San Onofre. Moreover, for the major use of silver, photograph processing, all waste is collected and handled as hazardous waste and effluent from photographic processing operations flows to the sewage treatment plant at Unit 1. The sewage treatment plant discharges through the Unit 1 outfall. However, future monthly samples of Unit 3 Combined Discharge will be analyzed for silver.

If you require any additional information on this subject, please let me know.

Very truly yours,



Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
C. W. Caldwell, NRC Senior Resident Inspector, Units 1, 2 and 3