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 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362
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 ROSENBLUM, R.M. Southern California Edison Co.
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SUBJECT: Repts two NPDES permit violations, one for each of units.
 NPDES permits require grease & oil mass limitation of 3.3
 pounds per day.

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Southern California Edison Company

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R. M. ROSENBLUM
MANAGER OF
NUCLEAR REGULATORY AFFAIRS

June 17, 1992

TELEPHONE
(714) 454-4505

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Report of NPDES Permit Violation, April 1992
San Onofre Nuclear Generating Station Units 2 and 3

- References: 1) June 1, 1992, letter from H. W. Newton (SCE) to A. L. (Coe California Regional Water Quality Control Board, San Diego Region), Subject NPDES Monitoring Report, San Onofre Nuclear Generating Station, Unit 2.
- 2) June 1, 1992, letter from H. W. Newton (SCE) to A. L. Coe (California Regional Water Quality Control Board, San Diego Region), Subject: NPDES Monitoring Report, San Onofre Nuclear Generating Station, Unit 3.

Section 3.2 of Appendix B to Facility License Nos. NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 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. The referenced letters are provided as an enclosure.

The NPDES permits for Units 2 and 3 require a grease and oil mass limitation of 3.3 pounds per day. The value reported for April is less than 3.4 pounds per day for Unit 2 and is less than 4.0 pounds per day for Unit 3. Although there was no grease and oil detected in the discharge sample, the laboratory analysis detection limit for the grease and oil sample was reported to SCE as less than 5 ppm because no oil was detected. However, the use of less than 5 ppm in the mass emission calculation results in corresponding mass values of less than 3.4 pounds per day for Unit 2 and less than 4.0 pounds per day for Unit 3.

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June 17, 1992

To eliminate this calculated uncertainty in the future, SCE will assure that the laboratory will conduct their analysis to the lowest possible detection limit for grease and oil beginning in June 1992.

If you have any questions, please contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R M Baser". The signature is fluid and cursive, with a long horizontal stroke at the end.

cc: J. B. Martin, Regional Administrator, NRC Region V
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3

June 1, 1992

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 operational all month and all sampled water sources were within permit limits with one exception. The exception is to the grease and oil mass emission limitation for the radwaste system (a low volume waste source). The permit requires a grease and oil mass limitation of 3.3 pounds per day. The value reported for April is less than 3.4 pounds per day. Although there was no grease and oil detected in the discharge sample, the following factor resulted in the indicated exception.

The laboratory analysis detection limit for the grease and oil sample was reported as less than 5 ppm because no oil was detected. However, the use of the less than 5 ppm in the mass emission calculation results in a corresponding mass value of less than 3.4 pounds per day. This value represents a calculated range in the mass value between 0 pounds per day and 3.4 pounds per day. Edison will correct this range of calculated uncertainty in the future.

To eliminate this calculated uncertainty in the future, Edison will assure that the laboratory will run at the lowest possible detection limit for the method beginning in June 1992.

June 1, 1992

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 M. Goodson, 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

rmg:u292APR.NPD

Enclosures

cc: Environmental Protection Agency, Region IX

bcc: R. M. Rosenblum

H. W. Newton/M. J. Johnson *my*

R. V. D. Reid

~~L. D. Brevig~~

R. D. Plappert

A. R. Kneisel/R. K. Heckler/R. M. Goodson *RMG RKT*

K. T. Herbinson

CDM Files

Environmental Protection Files

June 1, 1992

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 3

The NPDES Discharge Monitoring Report (DMR) for San Onofre Unit 3 covering the month of April is submitted in accordance with the requirements of Order No. 85-13 (NPDES Permit No. CA0108181). A summary of the generating unit's status and significant analytical results is provided below.

The unit was operational all month and all sampled water sources were within permit limits with one exception. The exception is to the grease and oil mass emission limitation for the radwaste system (a low volume waste source). The permit requires a grease and oil mass limitation of 3.3 pounds per day. The value reported for April is less than 4.0 pounds per day. Although there was no grease and oil detected in the discharge sample, the following factor resulted in the indicated exception.

The laboratory analysis detection limit for the grease and oil sample was reported as less than 5 ppm because no oil was detected. However, the use of the less than 5 ppm in the mass emission calculation results in a corresponding mass value of less than 4.0 pounds per day. This value represents a calculated range in the mass value between 0 pounds per day and 4.0 pounds per day. Edison will correct this range of calculated uncertainty in the future.

To eliminate this calculated uncertainty in the future, Edison will assure that the laboratory will run at the lowest possible detection limit for the method beginning in June 1992.

Mr. Arthur L. Coe

-2-

June 1, 1992

Pursuant to Order No. 85-13, Reporting Requirement 12, the following representative has prepared and is authorized to sign the reports required by this order: Robert M. Goodson, 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

rmg:U392APR.NPD

Enclosures

cc: Environmental Protection Agency, Region IX

bcc: R. M. Rosenblum
H. W. Newton/M. J. Johnson 
R. V. D. Reid
~~L. D. Brevig~~
R. D. Plappert
A. R. Kneisel/R. K. Heckler/R. M. Goodson 
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