

# COPY

## PACIFIC GAS AND ELECTRIC COMPANY

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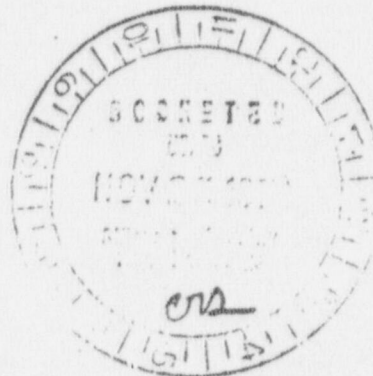
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November 22, 1974



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Elizabeth S. Bowers, Esq.  
Chairman  
Atomic Safety and Licensing  
Board Panel  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Re: Dockets 50-275-OL  
50-323-OL

Dear Mrs. Bowers:

It is not clear to me whether the Board's order dated November 4, 1974 covers the supplement to the stop work order motion filed by the San Luis Obispo Mothers For Peace (MFP) dated October 28, 1974.

The MFP portion of the supplement adds nothing of substance to the original motion. While we may not accept all the allegations in the attached statement by Dr. David Chipping, it is difficult to quarrel with his conclusion (par. 6) that the so-called Hosgri fault zone should be "taken rather seriously". Of course, it is being taken seriously, as evidenced by our submittals to the FSAR, and we expect to consider it on the record during the operating license hearing. In any event, Dr. Chipping's statement provides no basis for issuance of a stop work order, nor does it purport to provide any such basis.

In short, the supplement adds nothing to the original motion, which has already been denied.

Very truly yours,

Philip A. Crane, Jr.

8707300347 870721  
PDR FOIA  
CONNOR87-214 PDR

Attachment

COPY

Elizabeth S. Bowers, Esq.

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November 22, 1974

CC w/attachment: Elizabeth E. Apfelberg  
Richard L. Black, Esq.  
Glenn O. Bright  
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## RNIA REGIONAL WATER QUALITY CONTROL BOARD—

## SOUTHERN COAST REGION

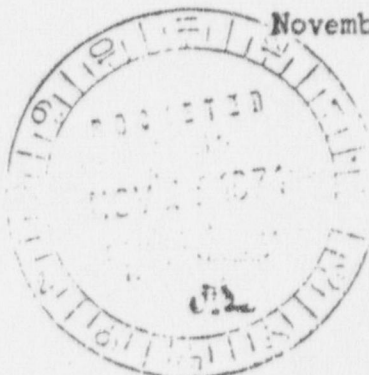
EL LANE Suite A  
OBISPO, CALIFORNIA 93401

RECEIVED OCTOBER 17 1974



November 13, 1974

Mr. John T. Wells  
Pacific Gas & Electric Co.  
3400 Crow Canyon Road  
San Ramon, Ca. 94583



Dear Sir:

On October 11, 1974 the Board adopted Order No. 74-41 and NPDES permit No. CA0003751 Waste Discharge Requirements for PG&E Diablo Canyon Nuclear Power Plant in San Luis Obispo County. This was an interim permit which expires May 1, 1976 and allows PG&E time to complete all studies necessary to implement the provisions of all regulations established pursuant to Section 316(b) of the Federal Water Pollution Control Act.

In Order No. 74-41 it was stated that the monitoring and reporting programs adopted October 17, 1969 shall remain in effect, but that the Executive Officer may revise or amend the program for any reason including gathering data on low volume waste sources.

Due to the problems encountered in Diablo Cove from startup and testing procedures we have revised the monitoring program to provide information which will be used to solve these problems.

Enclosed is a copy of the revised monitoring program for your review. We would appreciate any comments you have in writing by December 9, 1974. If no response is received by that date we will assume that you concur with the program and request that you initiate it by January 6, 1975.

Very truly yours,

KENNETH R. JONES  
Executive Officer

KRJ:JN/kj  
Encl.



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION

Monitoring Program and Schedule of Technical Reports  
to be Submitted to Regional Board by  
Pacific Gas & Electric Company - Diablo Canyon  
Nuclear Power Plant, San Luis Obispo County

I. Records to be maintained concerning plant discharge:

- A. Average daily volume of waste discharge. Total daily flow during pre-operational testing.
- B. Oil content of discharge from oil removal facilities - intermittent discharge to be sampled quarterly.
- C. pH of discharge -- daily when chemical cleaning of equipment is in progress. Also pH of intake when back washing.
- D. Temperature of cooling water intake and discharge -- daily.
- E. Static Bioassay (96 hr TLM, using species indigenous to receiving water area) of discharge during pre-startup cleaning of equipment and piping, prior to discharge of materials to Diablo Cove. Bioassays are to be conducted prior to any materials discharged to the receiving water. Accumulation of heavy metals in tissue shall be conducted on all bioassay tested animals. This is to be done until it is determined the toxic effects of all materials discharged. Bioassay on the screen backflush water for the worst possible cases shall also be conducted.
- F. Concentration of radioactivity in the discharge, including the total quantity -- daily.
- G. Concentration of heavy metals in the discharge, including total daily mass emission rates. Water samples are to be taken during pre-startup, pump testing, start up after maintenance operations and at other times as specified by the staff of the Regional Board. Water samples are to be taken at initial discharge and at 2 minute intervals not to exceed 45 minutes. Precision of measurement for heavy metal analyses must be  $\pm 1$  ppb. This testing shall continue until the decay rate of corrosion in the system has been determined.

II. Records to be maintained concerning receiving waters:

- A. Complete radiological waste monitoring program as deemed adequate by the State Department of Public Health and relevant to the receiving waters, environment and discharge.
- B. Ecological studies as specified by the Department of Fish and Game shall be continued in order to evaluate changes of the marine plant and animal distribution and abundance within Diablo Cove.

- C. Ecological studies as specified by the Department of Fish and Game shall be conducted in the marine environment outside of Diablo Cove in order to evaluate the ecological conditions.
- D. Aerial photographs of the existing kelp beds from Pecho Rock to Point Buchon shall be taken three times per year, during February, June and October, for a period of at least two years after initiation of operation.
- E. Surface water temperatures shall be determined at two-month intervals from Point Buchon to Pecho Rock for at least two years following the beginning of discharge. Isotherms shall be determined in 2° F intervals. Individual surveys shall be conducted consistently during the late morning hours at the same time each day.
- F. Water temperatures shall be measured at one meter intervals from the surface to the bottom at seven stations prescribed by the Department of Fish and Game inside and adjacent to Diablo Cove. Measurements shall be taken in February, June, and October. Precision of measurements shall be within  $\pm 0.2^{\circ}\text{F}$ .
- G. Five 1/2 square meter quadrats in the rocky intertidal zone at locations formerly documented by the Department of Fish and Game shall be photographed three times per year for at least two years following discharge. A 2-1/4" color transparency shall be used for this purpose. Photographic schedule will conform to recommendations of the Department of Fish and Game.
- H. pH and dissolved oxygen content of the receiving waters in February, June, and October.
- I. Incident light measurements shall be taken at three meter intervals from the surface to the bottom at 9 stations prescribed by the Department of Fish and Game. Measurements shall be taken on a monthly basis during times of discharge. Measurement shall be with a photometer cell.

### III. Collection of samples:

- A. Temperature, oil, dissolved oxygen, and pH samples shall be grab samples.
- B. Sampling for radioactivity monitoring shall be approved by the State Department of Public Health Bureau of Radiological Health.
- C. All other samples shall be collected in accordance with accepted procedures having approval of the Department of Fish and Game or the staff of this Regional Board.

### IV. Reports to the Board:

- A. A report shall be made to the Board quarterly on that portion of the State Department of Public Health's approved environmental monitoring

program relating to the marine environment and the discharge, including daily radiological concentration and total quantity in the discharge.

B. Reports shall be made to the Board monthly not later than the 15th day of the following month and shall include:

1. Results of daily volume measurements.
2. Results of daily cooling water intake and discharge temperature measurements.
3. Results of oil content analyses of discharge from removal facilities.
4. Results of all bio-assay (96 hour TLM) tests performed.
5. Results of ecological studies as specified in Paragraph II. B., C., E., F., and H., above.
6. Copies of photographs as specified in Paragraph II. G., above.
7. The occurrence of any incident causing the level of radioactivity to exceed permissible levels or causing the release of other toxic materials in concentrations detrimental to human, plant, bird or fish life shall be reported within 12 hours after its occurrence, and its cause, effect, and corrective action shall be described in detail in the next regular report submitted to the Regional Board.

V. Review and Evaluation of Monitoring Program, etc.:

Upon receipt of the Company's report at the end of the second year of plant operation, this Monitoring Program and Schedule of Technical Reports shall be re-evaluated in consultation with representatives of the Company, State Departments of Fish and Game and Public Health, and will be revised as deemed necessary to assure continued compliance with the Waste Discharge Requirements.