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SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

Mr. John Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Ct. Suite 100
San Diego, California 92123
IC: 13-0088.01:NAVRH

ITEM 5
SUPPORTING DOCUMENT 9

SUBJECT: Comments on Draft NPDES Permit Order Numbers R9-2005-0005 and R9-2005-0006 for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3

REFERENCES:

- SONGS NPDES Renewal Applications Dated February 10, 2004
- Letter From H.W. Newton Dated March 30, 2004

Dear Mr. Robertus:

Southern California Edison (SCE) has reviewed the draft NPDES Permit Orders R9-2005-0005 and R9-2005-0006 for the San Onofre Nuclear Generating Station Units 2 and 3 and we offer the following comments for your consideration:

SCE has the following comments in respect to chlorination:

- SCE requests that the chlorination duration and limits remain as they are in NPDES Order Numbers 99-47 and 99-48. The chlorination duration has been changed to restrict SONGS to no more than 25 minutes of chlorination per cycle. Although this reflects SONGS's current practice on chlorination, it unnecessarily restricts the plant and removes flexibility to change the chlorination practice based on biological loading in the circulating water system. This also results in a maximum chlorination limit of 176 ug/l.
- The frequency of chlorination monitoring has been increased from monthly to weekly in the proposed permits as detailed on pg. D-6. Since SCE has not exceeded the current effluent limitation for total residual chlorine during the entire 5-year duration of the existing NPDES Permits, we believe the current monthly sampling frequency is reasonable and should be retained.

SCE also requests that all of the NPDES requirements be placed in one NPDES permit.

- In the Los Angeles Region, several steam-electric generating plants employing multiple outfalls operate under single NPDES permits (one permit per facility, regardless of the number of outfalls). SONGS is treated differently, where two identical outfalls are each authorized by a separate NPDES permit. This results in SCE paying disproportionately high annual NPDES permit fees, even though the level of effort required by the Regional Board to administer the permits is no greater than that for other multiple-outfall generating stations. SCE requests that the San Diego Regional Board adopt a single NPDES permit covering both SONGS outfalls, consistent with the actions of other Regional Boards. This will preserve equity in the permit fee structure (see letter from H. W. Newton to J. Robertus dated March 30, 2004).

San Onofre Nuclear Generating Station
P. O. Box 128
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SCE also requests the following changes:

- On page D-15, the permit requires SONGS to participate in regional watershed/ocean monitoring. SCE requests that once this monitoring commences, nearshore receiving water monitoring be reduced by an equivalent amount. The total cost of receiving water monitoring should not increase as a result of our participation in a regional effort..
- On Attachment 3 to the monitoring and reporting program, SONGS is required to conduct a screening study for chronic toxicity on the first sample obtained once the new permit orders are issued. Since SCE just recently completed a chronic toxicity screening study on Units 2 and 3 effluents during the 4th quarter of 2004, we request that this first screening study under the renewed permit be deferred until the 4th quarter of 2006. Subsequent toxicity screenings will be conducted every two years thereafter.
- On pages E-25 and E-26, the permit states that SCE will need to pursue a thermal plan exception to allow the requested changes in heat treatment scheduling and instantaneous temperature limits during circulating water pump "bumping" . SCE believes that a thermal plan exception is not necessary because the scope of the requested modifications is within the analysis used to approve the prior thermal plan exemption. The requested modifications will not increase the thermal component of any individual heat treatment beyond that already approved in the thermal plan exemption. Also, SCE was under the belief that using daily average temperature measurements was consistent with compliance with thermal plan exemptions. Thus, SCE requests that the Regional Board legal counsel verify that a thermal plan exception is legally required in this case. If an exception is not legally required,, we request that the renewed permits incorporate our requested changes.
- The proposed permits on pg. D-6 require SONGS to analyze the combined discharge for metals and other priority pollutants at a semiannual frequency. SONGS has been analyzing these constituents in our combined discharges and has never exceeded the limits for any of these constituents during the five year duration of the existing permits. Accordingly, we request that this frequency be reduced to annually for the combined discharges.
- The Plant Drains waste stream has been permanently removed from service at Unit 1. We therefore, request that it be removed from the draft NPDES permit orders.
- Item IV.B.5 in the permit drafts currently states: "Discharge of radioactive waste, which meets the definition of 'pollutant' in 40CFR122.2, shall not degrade marine life." Since radioactive effluents are under the sole juristiction of the NRC, this statement should be removed, or as a minimum be replaced with the language at the top of page 8 of NPDES Order Number 99-47 under item number 33.

SCE also requests the following clarifications:

- On page E-45 there is an example of how to calculate and obtain an annual in-plant waste composite sample for Units 2 and 3. For clarification, we request the following sentence be added at the end of the paragraph preceding the sample table: "Individual low volume wastewaters that account for no flow on the day of sample collection would not be included in a composite sample."
- In the monitoring and reporting section of the draft permits, there is no requirement for offshore or surf zone coliform sampling. However, on pg. 17 of the draft permits, there is wording from the Ocean Plan that refers to coliform sampling and limits. SCE requests clarification in this section that no coliform sampling is required by these orders.

Attachment E, the fact sheet of the permit drafts, should reflect the following changes:

- The saltwater cooling flow on page E-5 gives a maximum flowrate of 27 MGD. This should be corrected to 49 MGD (see NPDES renewal applications dated February 10, 2004).
- On page 8 in the steam generator blowdown section, the word dimythalamine should read diethanolamine.
- On page E-32 of the permit drafts, there is a typographical error. The 30 day average limit for oil and grease should be 15 mg/l, not 25 mg/l.

If you have any questions on any of the above comments, please contact Robert Heckler at (949)-368-6816.

Sincerely,

H. W. Newton
Manager, Site Support Services

cc: D. Nunn
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