

**California Regional Water Quality Control Board  
San Diego Region**

**Response to Comments Report**

**Tentative Order No. R9-2015-0073  
NPDES NO. CA0109282**

**Waste Discharge Requirements  
for Southern California Edison Company,  
San Onofre Nuclear Generating Station,  
San Diego County  
Discharge to the Pacific Ocean**

**December 16, 2015**

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

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**California Regional Water Quality Control Board  
San Diego Region**

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## Introduction

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has prepared this Response to Comments Report on Tentative Order No. R9-2015-0073, NPDES Permit No. CA0109282, Waste Discharge Requirements for Southern California Edison Company, San Onofre Nuclear Generating Station, San Diego County, Discharge to the Pacific Ocean (Tentative Order). The Tentative Order was made available for public review and comment for 31 days, with the comment period ending on October 26, 2015.

<u>Comments were received from:</u>	<u>Page No.:</u>
Southern California Edison	1

## Comments and Responses

The summarized comments and San Diego Water Board responses to the comments are listed in the table that follows. The table indicates if the Tentative Order was revised in response to the comment.

No.	Comment	Response	Action Taken	Tentative Order Reference
<b>Don Neal, Southern California Edison (SCE or Discharger)</b>				
<b>1</b>	<p><b>Facility Ownership</b></p> <p><b>Comment:</b> SCE requests that this item be modified to ensure that the permit accurately reflects the facility's ownership. SCE is the operator but not the sole owner of the San Onofre Nuclear Generating Station (SONGS or Facility). For reference, SCE owns 78.2% of the facility, San Diego Gas &amp; Electric owns 20% of the facility, and City of Riverside owns 1.8% of the facility. The City of Anaheim is a Co-Participant, but is no longer a facility owner.</p> <p><b>Suggested Revision:</b> Southern California Edison Company (SCE or Discharger) is the majority owner and operator of the San Onofre Nuclear Generation Station (hereinafter SONGS or Facility), a nuclear-fueled electrical power generating facility undergoing decommissioning. <u>SCE owns 78.2% of the facility, while San Diego Gas &amp; Electric and City of Riverside own 20% and 1.8%, respectively.</u></p>	<p>The San Diego Water Board has no objection to the requested revision of the Tentative Order to clarify the specific share of Facility ownership held by SCE, SDG&amp;E, and the City of Riverside.</p>	<p>The Tentative Order has been revised as requested.</p>	<p>Page F-4; Attachment F, section I.A.</p>

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2	<p><b>Temperature Monitoring</b></p> <p><b>Comment:</b> In preparation for decommissioning of the plant, the SCADA (supervisory control and data acquisition) controlled monitors, probes, and computer program capabilities will be limited and will render the facility operator unable to conduct the monitoring at the required frequency. Additionally, because the Facility is no longer generating electricity, the cooling needs have been eliminated (except for the spent fuel storage) and there is no longer a temperature delta that would trigger a sampling requirement with this frequency. The receiving water monitoring requirements, as outlined in Attachment E Section IV.E, include recording temperature data every 15 minutes using ocean buoys. The data collected via ocean monitoring serve to provide continuing, high frequency temperature data, without the need for additional sampling every two hours at Discharge Points 002 and 003 as outlined above. SCE requests that temperature monitoring frequency be reduced to weekly samples, to be reported in the monthly report, beginning when the once through cooling for the spent fuel storage and heating, ventilation, and air conditioning</p>	<p>Following cessation of normal operations at SONGS, cooling water intake flow rates have been reduced to approximately 49 million gallons per day (MGD). Considering that cooling water is still needed during decommissioning for the spent fuel storage pool and the HVAC (heating, ventilating, and air conditioning) system, the threat of thermal discharges from the Facility causing a condition of pollution or nuisance has diminished, but has not been eliminated. The San Diego Water Board has no objection to the requested changes for a reduction in temperature data monitoring once the need for cooling water at the Facility has been eliminated. Footnote 10 has been added to Table E.9 of the Tentative Order to provide that when cooling water is no longer required for Facility operations and subject to written concurrence by the San Diego Water Board, the frequency of effluent monitoring for temperature may be reduced from once every 2 hours to weekly.</p>	<p>The Tentative Order has been revised as noted.</p>	<p>Pages E-14 and E-15; Attachment E, Table E-9; footnote 8.</p>

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	<p>(HVAC) cooling systems are isolated from Discharge Points Nos. 002 and 003. Until the spent fuel storage and HVAC systems are isolated, SCE will continue to perform the once every 2 hour interval. The weekly temperature samples would be taken by hand and recorded by the facility operator concurrent with other monitoring activities.</p> <p><b>Suggested Revision:</b>            Temperature monitoring should be required once every two hours until the spent fuel storage and HVAC cooling systems have been isolated from Discharge Points Nos. 002 and 003. When the Once through Cooling portions of the discharge have been isolated, the minimum sampling frequency will be weekly.</p>			



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3	<p><b>Fish Tissue Monitoring</b></p> <p><b>Comment:</b> SCE requests removal of the requirements to sample fish for the purposes of contaminant bioaccumulation for the following reasons:</p> <p>1) This is a provision that was not previously required as part of the SONGS National Pollutant Discharge Elimination System (NPDES) receiving water monitoring during the Facility's operational phase. SCE would like to understand the justification for requiring tissue analysis as part of the NPDES permit for the first time. While SONGS discharges wastewater from plant sanitary systems, the volume of waste is significantly less than that of publicly-owned treatment works (POTWs) and is further reduced in the Facility's shut down configuration and by reduction of staff.</p> <p>2) SCE believes fish tissue sampling for the purposes of assessing human health impacts is not a reasonable request now that the plant is shut down. In addition, SCE knows of no other power plant with an NPDES permit that requires fish tissue sampling like that proposed in the Tentative Order. This is likely due to long-</p>	<p>The previous orders, Orders Nos. R9-2005-0005 and R9-2005-0006, included a requirement for quarterly trawling surveys to survey fish populations, not to analyze contaminant bioaccumulation in fish tissue. The requirement to monitor for contaminant bioaccumulation in fish is consistent with permits for other ocean outfall dischargers who are discharging treated sewage wastewater. However, the San Diego Water Board agrees that the bioaccumulation monitoring requirement is not warranted in the Tentative Order given the limited 0.05 MGD flow volume from the North Industrial Area Sewage Treatment Plant and the substantial overall reduction in flows from the Facility. Based on these considerations, the requirement has been revised to continue the fish population surveys as required by the previous orders and delete the bioaccumulation monitoring requirement.</p>	<p>The Tentative Order has been revised as noted.</p>	<p>Pages E-21 and E-22; Attachment E., section IV.C.</p>

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	<p>term trends of the Water Board's State Mussel Watch Program, which has reported declines in many of the contaminants measured as part of the mussel tissue bioaccumulation monitoring along the coast of California; rarely do results demonstrate levels above background contamination. In addition, historic receiving water monitoring at SONGS has demonstrated that plant discharges have no significant adverse effect to water quality.</p>			
4	<p><b>Once-Through Cooling (OTC) Policy Immediate and Interim Requirements</b></p> <p><b>Comment:</b> As outlined in SCE's April 1, 2011 letter to Phil Isorena, State Water Resources Control Board NPDES Unit Chief, SCE has demonstrated compliance with the OTC Policy's interim mitigation requirements through the ongoing SONGS Marine Mitigation Program required by and monitored through the California Coastal Commission. In total, SCE has implemented marine mitigation projects that fully mitigate marine impacts from SONGS.<sup>1</sup></p> <p><sup>1</sup> - February 4, 2010 letter from Peter Douglas, Executive Director California</p>	<p>The San Diego Water Board has included the referenced letters in the administrative record for the Tentative Order and does not object to the requested change. The Fact Sheet has been modified to state that SCE has demonstrated compliance with the OTC Policy's interim mitigation requirements.</p>	<p>The Tentative Order has been revised as noted.</p>	<p>Page F-47 and F-48; Att. F, section VI.B.6.b.iii</p>

No.	Comment	Response	Action Taken	Tentative Order Reference
	Coastal Commission to State Water Resources Control Board Chairman Chair Charles Hoppin and Board Members.			
5	<p><b>Site Map Update</b></p> <p><b>Comment:</b> The aerial map shown as Site Map B.2, on page B-1 has been updated. The current map version is included as Attachment 1 to this comment letter, and an identical copy will be provided electronically under separate cover.</p>	The map in Attachment B has been updated as requested.	The Tentative Order has been revised as noted.	Attachment B, Map B-2.