



Al Bates
Manager
Regulatory Affairs

October 20, 2022

Environmental Protection Plan

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

**Subject: Docket Nos. 50-361 and 50-362
Report of Violations of the National Pollutant Discharge Elimination System Permit
San Onofre Nuclear Generating Station (SONGS), Units 2 and 3**

Dear Sir or Madam:

Provided as the Enclosure to this letter is a copy of a response to a violation of the National Pollutant Discharge Elimination System (NPDES) Permit for the San Onofre Nuclear Generating Station (SONGS). This violation response, which was originally submitted to the San Diego Regional Water Quality Control Board, is being provided to the NRC as required by the SONGS Environmental Protection Plan, Section 3.2. The Environmental Protection Plan is Appendix B to the SONGS Units 2 and 3 Operating Licenses.

During January of 2022, required temperature sampling was not performed during approximately seven days of operation of the intake pumps. Note that because SONGS no longer generates a thermal discharge the temperature difference between intake and outfall has been zero degrees F since August of 2016.

The response to the resulting NPDES permit violation is provided in the Enclosure.

There are no commitments contained in this letter or its attachments.

If you have any questions, please contact me at (949) 368-7024.

Sincerely,

IE25
NRR

Enclosure: SONGS response to RWQCB on lack of temperature monitoring.

cc: S. A. Morris, Regional Administrator, NRC Region IV
A. M. Snyder, NRC Project Manager, San Onofre Units 1, 2, and 3

Enclosure

**SONGS response to Regional Water Quality Control Board
on Lack of Temperature Monitoring**

Mark E Morgan

From: BRIAN METZ
Sent: Tuesday, February 8, 2022 8:32 AM
To: Lim, Joann@Waterboards
Cc: BRIAN METZ; Brian W. Couture; amandeep.singh@aecom.com
Subject: Two issues for your awareness re: San Onofre Nuclear Generating Station (SONGS)

Joann,

Please note that because of decommissioning activities within the intake structures, the intake pumps were predominately not running throughout the month of January 2022. The weekly intake/outfall seawater temperature samples were collected the first week full week of operation prior to the intake pumps being shut down, but temperature samples were not collected for the approximate 7 days the pumps were in operation the remainder of the month. The operation for the remainder of the month was to support operation of the NIA sump and sewage treatment plant and occurred during off-shift and weekend time periods. SONGS has not generated a thermal discharge since plant cooling water was no longer needed on August 26, 2016 @ 14:27 and since that time has continually reported a 0-degree temperature delta between intake and outfall waters. This was confirmed with the return of the dilution pumps during the first week of February 2022, and as expected there is a 0-degree temperature delta. This will be documented within the January 2022 monthly report within CIWQS.

In the November 2021 monthly report, it was noted that the Large Organism Exclusion Device (LOED) on the Primary Offshore Intake Structures were repaired per the dive team. Upon reviewing the final repair report, which was received in late January 2022, there are still some additional repairs that are needed to be made. This has been discussed with the Engineering team and they are reviewing the report and determining repair options and schedule. Most likely these repairs will be performed and completed during the summer months, when the ocean swells will allow us to perform the diving operations unencumbered. We continue to monitor the intake area/dilution pump areas for Large Organisms and have had none since we decreased our intake ocean water usage back in 2016 by over 98%. Once the additional repairs are completed, I will ensure that it is documented within the monthly report.

Please let me know if you have any questions or concerns with these approaches. Thanks,
Brian

Brian D. Metz
Manager, Environmental
Decommissioning Oversight Agent Specialist

Southern California Edison
San Onofre Nuclear generating Station
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