



October 23, 2015

Ms. Brandi N. Outwin-Beals, P.E.
Senior Water Resources Control Engineer
Source Control Regulation Unit
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Re: Southern California Edison Comments on Tentative Order No. R9-2015-0073, Waste Discharge Requirements (NPDES No. CA0109282) for Southern California Edison Company, San Onofre Nuclear Generating Station (SONGS), San Diego County, Discharge to the Pacific Ocean

Dear Ms. Outwin-Beals,

On November 10, 2009 and again on December 8, 2014, Southern California Edison (SCE) submitted its Report of Waste Discharge to renew coverage under its above-referenced NPDES Permit for the San Onofre Nuclear Generating Station (SONGS) as required by the Regional Water Quality Control Board, San Diego (Regional Water Board). SCE announced permanent retirement of SONGS in June 2013, but continues to discharge wastewater and cooling water through the existing ocean outfalls for Units 2 and 3. The facility's current cooling water usage has decreased by over 96% compared with water use during operation. The previous NPDES permits provided for a combined facility discharge of 2,574 million gallons per day (MGD).

SCE has reviewed the Tentative Order, and has the following five comments on the permit language.

1. Facility Ownership

Permit Reference: Fact Sheet, Section I.A, page F-4 states that Southern California Edison Company (SCE or Discharger) is the owner and operator of the San Onofre Nuclear Generation Station (hereinafter SONGS or Facility), a nuclear-fueled electrical power generating facility undergoing decommissioning.

Comment: 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 SONGS. For reference, SCE owns 78.2% of the facility, San Diego Gas & 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.

Suggested Revision: 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. SCE owns 78.2% of the facility, while San Diego Gas & Electric and City of Riverside own 20% and 1.8%, respectively.

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2. Temperature Monitoring

Permit Reference: Monitoring and Reporting Program, Attachment E, Table E-9 page E-14. The Tentative Order carries forward the 2005 Permit requirement to conduct temperature monitoring at Discharge Point Nos. 002 and 003 every two hours.

Parameter	Units	Sample Type	Minimum Sampling Frequency	Reporting
Flow (Average and Maximum Daily)	MGD	Recorder/ Totalizer	Continuous	Monthly
Temperature (Average and Maximum Daily)	°F	Grab	Once every 2 hours	Monthly
...

Comment: In preparation for decommissioning of the plant, the SCADA-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 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.

Suggested Revision:

Parameter	Units	Sample Type	Minimum Sampling Frequency	Reporting
Flow (Average and Maximum Daily)	MGD	Recorder/ Totalizer	Continuous	Monthly
Temperature (Average and Maximum Daily/ Weekly)	°F	Grab	<u>Once every 2 hours/ Weekly</u> ⁸	Monthly
...

⁸ Once every 2 hours temperature monitoring is required 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.

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3. Fish Tissue Monitoring

Permit Reference: Monitoring and Reporting Program, Attachment E, Section IV.C. The Tentative Order includes requirements for fish tissue monitoring using samples collected via Trawling Surveys.

Comment: SCE requests removal of the requirements to sample fish for the purposes of contaminant bioaccumulation for the following reasons:

1) This is a provision that was not previously required as part of the SONGS 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 POTWs and is further reduced in the plant's shut down configuration and by reduction of staff.

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-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.

4. Once-Through Cooling (OTC) Policy Immediate and Interim Requirements

Permit Reference: Fact Sheet, Attachment F, Section VI.B.6.b.iii states that the Discharger shall implement measures to mitigate interim impingement and entrainment impacts until full compliance is achieved by December 31, 2022.

Comment: 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.¹

5. Site Map Update

Permit Reference: Maps, Attachment B, Map B.2. 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.

¹ February 4, 2010 letter from Peter Douglas, Executive Director California Coastal Commission to State Water Resources Control Board Chairman Chair Charles Hoppin and Board Members.

*Ms. Outwin-Beals, P.E.
San Diego Regional Water Quality Control Board*

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Should you have any questions or wish to discuss the information in this comment letter, please do not hesitate to contact Paul Ahn at (626) 462-8711, or Brian Metz at (949) 368-7311.

Best Regards,

A handwritten signature in black ink that reads "Don Neal". The signature is fluid and cursive, with the first name "Don" being more prominent and stylized than the last name "Neal".

Don Neal
Director, Corporate Environmental Services
Southern California Edison

Attachment

Attachment 1: Revised Aerial Map



Attachment 1: Revised Aerial Map



San Onofre
Nuclear
Generating
Station

Southern
California Edison

Aerial Site Map



Not to Scale

Aerial from Google Earth
(Imagery Date: 04/27/2014)