

November 17, 2006

Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: **Docket Nos. 50-206, 50-361, 50-362 and 72-41
Request for Emergency Plan Change
Proposed Revision to the
Protective Action Recommendation Methodology
San Onofre Nuclear Generating Station, Units 1, 2 and 3
and Independent Spent Fuel Storage Installation**

Gentlemen:

Pursuant to the Code of Federal Regulations, 10 CFR 50.54(q) and 10 CFR 50.4(b)(5), Southern California Edison (SCE) hereby submits a proposed change to the San Onofre Nuclear Generating Station Emergency Plan. This Emergency Plan revision requests a change to the existing Protective Action Recommendation (PAR) methodology.

The proposed change has been reviewed considering the requirements of 10 CFR 50.47(b), 10 CFR 50.54(q), and 10 CFR 50, Appendix E. The review determined that adopting the proposed new PAR methodology does not adversely impact SONGS' ability to protect the health and safety of the public or onsite personnel. The proposed revision requires prior U. S. Nuclear Regulatory Commission (NRC) approval because SCE has determined that the SONGS Emergency Plan is using an alternate method to meet Federal PAR regulations, standards, and guidance.

The enclosed document "San Onofre Nuclear Generation Station (SONGS) Emergency Plan Proposed Change to the Protective Action Recommendation (PAR) Methodology" provides additional information regarding the requested change.

SCE views this proposed change as a needed improvement to the SONGS Emergency Plan and that it is consistent with NRC guidance published in Regulatory Information Summary 2005-08, "Endorsement of Nuclear Energy Institute (NEI) Guidance 'Range of Protective Actions for Nuclear Power Plant Incidents.'" As such, SCE requests NRC approval as soon as possible. SCE requests this change to be effective immediately upon approval, to be implemented within 60 days.

SCE is making no formal commitments that would derive from NRC approval of the proposed amendment.

SCE employees are available to meet with the NRC staff, as needed, to facilitate the review and approval of this submittal. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Brian Katz". The signature is written in a cursive style with a large, stylized initial "B".

Enclosure

cc: B. S. Mallett, Regional Administrator, NRC Region IV
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3

**San Onofre Nuclear Generation Station (SONGS)
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Protective Action Recommendation (PAR) Methodology**

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**San Onofre Nuclear Generating Station (SONGS)
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SECTION 1.0: Description and Justification of Proposed Revision

1.1 Description Of Proposed Revision

Section 6 (Emergency Measures) of the Southern California Edison (SCE) SONGS Emergency Plan and the implementing procedure SO123-VIII-10.3 (Protective Action Recommendations) are being revised to change the current Offsite Protective Action Recommendation (PAR) methodology.

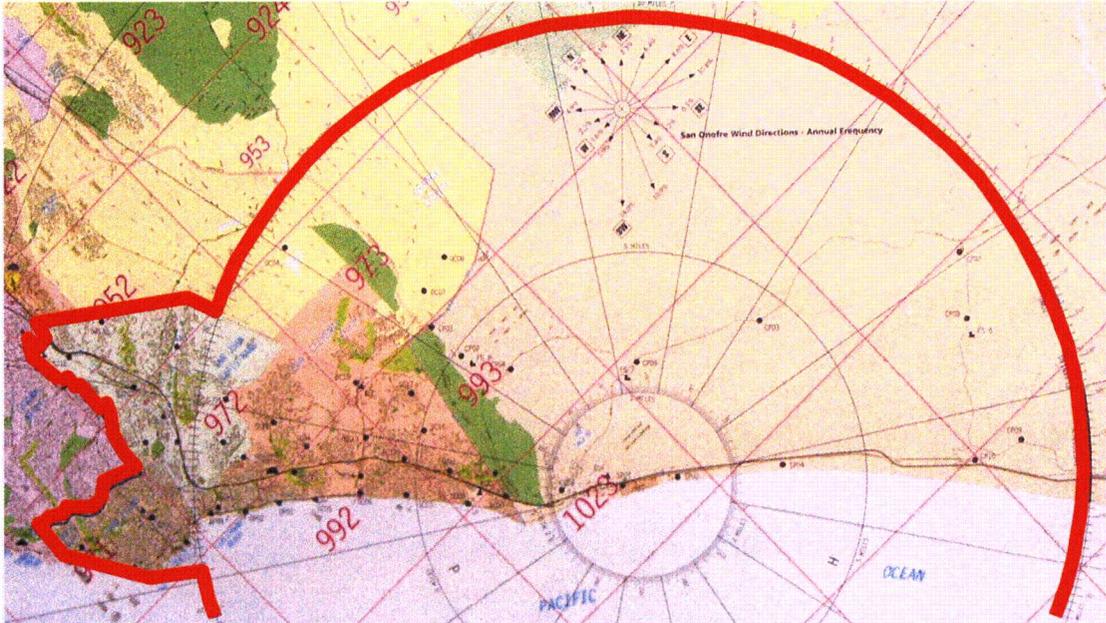
The current SONGS PAR methodology for a General Emergency (GE) evacuates or shelters the entire Emergency Planning Zone (EPZ) regardless of wind direction or radiological consequences. It is essentially an “all or nothing” PAR for the EPZ.

The proposed PAR methodology is more risk informed. It divides the EPZ into Protective Action Zones (PAZ) so that wind or plume direction and radiological consequences are considered. This allows the closest-in population to be evacuated first, dose consequences to be considered, and considers geopolitical boundaries. The new methodology also better aligns the concept of a “puff” release with the regulations.

The new PAR methodology continues to meet the requirements of 10 CFR 50.47(b)(10) and other regulatory documents as described in section 1.3 of this document. The new methodology is viewed by San Onofre and its offsite planning partners as a significant improvement over the current PAR methodology. However, since the new PAR methodology utilizes Protective Action Zones versus the more standard approach of evacuating 2 miles around and 5 miles downwind from the plant at a General Emergency, San Onofre has concluded that it is an alternate method of meeting the regulation.

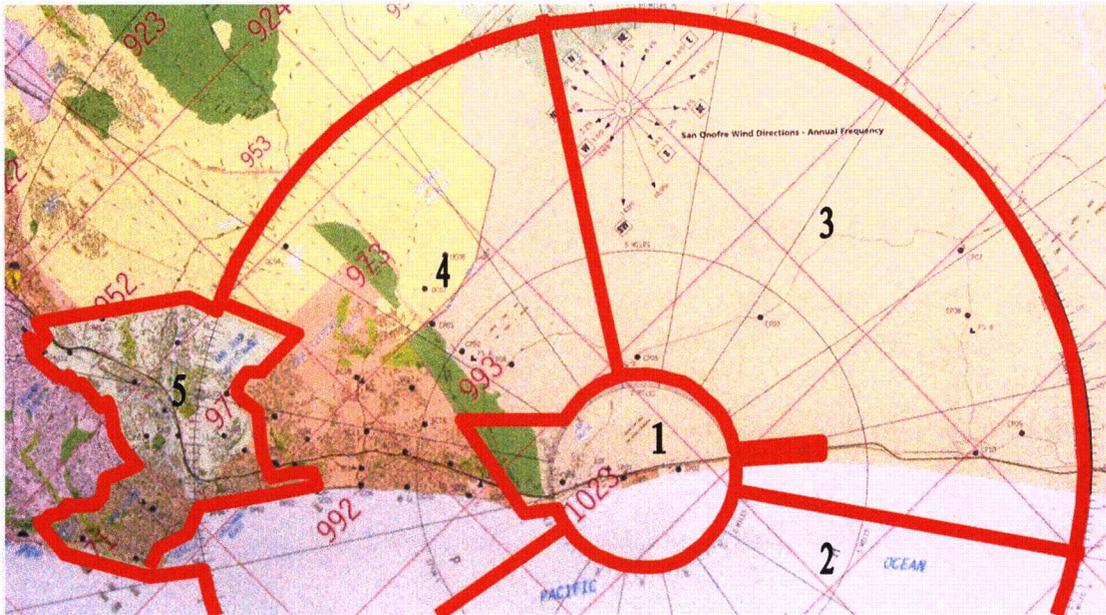
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Current EPZ PAR Methodology



In the current PAR methodology the entire population within the EPZ (shown above by the bold line) is evacuated or sheltered regardless of the wind direction or dose at a General Emergency.

Proposed EPZ PAR Methodology



The new PAR methodology considers wind direction so that only the affected PAZ 2, 3, or 4 will be evacuated or sheltered. A PAR for PAZ 5 will occur only if the wind direction is towards PAZ 5 and actual or projected dose at the PAZ 4/5 border reaches a predetermined level (See discussion on page 7).

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1.2 Description of New PAR Methodology

SONGS Emergency Plan, Section 6, Table 6-4 (Recommended Protective Actions To Reduce Exposure To A Radioactive Plume) and Emergency Plan Implementing Procedure (EPIP) SO123-VIII-10.3 (Protective Action Recommendations), Protective Action Recommendations will be revised as discussed below:

The Alert PARs and the current default PAR for a Site Area Emergency (SAE) are not being changed. These PARs are being reformatted to fit into the new SONGS PAR Table.

The SAE PAR that shelters the entire EPZ if a dose value of 170 mrem Total Effective Dose Equivalent (TEDE) is measured at the Exclusion Area Boundary (EAB) is being deleted.

The GE PAR methodology will change as follows:

The current PAR methodology consists of one EPZ, which is not divided into sectors, areas, or zones. The result is an “all or nothing” PAR (shelter or evacuate) for the EPZ population regardless of wind direction or dose consequence. The new SONGS PAR methodology will assess the wind direction and dose to make the necessary decision concerning which portions of the EPZ to shelter or evacuate. To create this more risk-informed PAR, the SONGS EPZ is divided into five Protective Action Zones (PAZs).

If the wind direction is on the division line between PAZ 2, 3, 4, or 5, then the additional PAZ being affected would be included in the evacuation.

PAZ 1 is roughly a 2-mile, 360-degree circle around SONGS. It extends beyond 2 miles in some areas to include the entire San Onofre State Beach, San Mateo Campground, San Onofre Bluffs Campground, and Camp Pendleton housing. PAZ 1 has a summer weekday population of approximately 18,000.¹

PAZ 2 is the South-Southeast, South, South-Southwest, Southwest, West-Southwest, and West map directional sectors. PAZ 2 is the Pacific Ocean and has no permanent population and so evacuating beyond 2 or 5-miles would have very little additional impact.¹

¹ SONGS Emergency Plan Appendix G (Evacuation Time Estimates)

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PAZ 3 includes Southeast, East-Southeast, East, East-Northeast, and Northeast map directional sectors. This PAZ encompasses Camp Pendleton. PAZ 3 has a summer weekday population of approximately 7,100.¹

PAZ 4 includes West-Northwest, Northwest, North-Northwest, North, and North-Northeast map directional sectors and includes San Clemente, a portion of Camp Pendleton, and a portion of unincorporated Orange County. PAZ 4 has a summer weekday population of approximately 75,500.¹

PAZ 5 consists of the cities of Dana Point and San Juan Capistrano and extends to approximately 12-miles. PAZ 5 has a summer weekday population of approximately 93,200.¹ Although PAZ 5 extends beyond the 10-mile EPZ referenced in Environmental Protection Agency (EPA) document EPA 400, PAZ 5 would not initially be evacuated, unless the EAB has a TEDE dose of greater than or equal to 5000 mrem, which is equivalent to approximately 100 mrem TEDE at 7 miles, which corresponds to the nearest point of PAZ 5 to the plant.

Dividing the EPZ into Protective Action Zones is similar to using Emergency Response Planning Areas (ERPA). An ERPA is a defined area within the 10-mile EPZ for which emergency response plans have been developed, including notification of emergency protective actions, sheltering or evacuation.

The Offsite Dose Assessment Center Subcommittee, Interjurisdictional Planning Committee (IPC), and the SONGS Offsite and Onsite Emergency Planners decided to use Planning Area Zones (PAZ) similar to emergency response planning areas (ERPAs) instead of using map directional sectors to break-up the EPZ. This was done to try to speed-up the implementation of SONGS PARs by the offsite agencies and lessen the confusion of converting map directional sectors to ERPAs. It was also thought this would help reduce public confusion concerning what areas to evacuate.

Similarly, other plants break up their EPZ into planning as part of their emergency planning and Protective Action Recommendations (e.g., Diablo Canyon uses Protective Action Zones, while Braidwood, Byron Clinton, Dresden, La Salle, and Quad Cities, Pilgrim, and Shearon Harris use sub-planning areas).

As opposed to the current PAR methodology, wind direction will be considered so that the affected downwind PAZ 3 or 4, and therefore only the at-risk populations, will be evacuated or sheltered. PAZ 2 consists of

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Pacific Ocean and it is not deemed reasonable to shelter any population that may be on the ocean, therefore, the only recommendation issued for PAZ 2 is to evacuate.

For a PAZ 5 PAR, a dose projection will be performed to determine the Exclusion Area Boundary (EAB) dose. If the projected dose at the EAB is 5,000 mrem or greater and the wind direction is towards PAZ 5, then PAZ 5 will receive either an evacuation or a shelter PAR.

If the release is a controlled “puff” release of less than 1 hour in duration, PAZ 1 and the affected downwind PAZ (3 or 4) will be sheltered. Again, downwind PAZ 2 has a sheltering exception because it is not deemed reasonable to shelter any population on the Pacific Ocean. The current PAR methodology of determining the Plume Exposure Time (PET) and comparing the Plume Exposure Time to the EPZ evacuation time will be eliminated.

The new methodology will retain the assessment of known evacuation impediments (caused by weather, earthquake, flooding, etc.) to determine whether a PAR of evacuation or shelter is appropriate for the affected Protective Action Zones.

1.3 Justification for the Proposed Revision (Meeting the Intent Of The PAR Federal Regulations, Standards and Guidance)

The new PAR methodology has the following advantages. It shelters or evacuates the population closest to the plant first, shelters or evacuates only the at-risk populations depending on wind direction and dose, maintains the existing EPZ boundary, and utilizes the emergency response structure afforded by the existing geopolitical boundaries.

The new methodology enhances protection of the public because the protective measures for the public are only recommended if the public is at risk. For example, if the wind is towards the Pacific Ocean (PAZ 2) or Camp Pendleton (PAZ 3), the PAZs with the majority of the SONGS EPZ population (PAZ 4 and PAZ 5) will not be evacuated or sheltered. This eliminates any increase in risk to the public associated with implementing these protective measures. In the current PAR methodology, the entire EPZ would receive the PAR and be subject to the risks that come with any evacuation or sheltering decision.

Limiting evacuation of PAZ 5, which begins about 7 miles from the plant, to cases when

- 1) the wind is towards PAZ 5 and

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- 2) dose at the SONGS EAB is projected or calculated to be greater than or equal to 5000 mrem, enhances the protection of the public in PAZ 1 and PAZ 4.

This is because when evacuating North on Interstate 5, the population should be able to evacuate faster than under the current PAR methodology since the PAZ 5 population of 93,200 will normally not be evacuated at the same time. The population in PAZ 5 is still appropriately protected because they are evacuated or sheltered if the projected dose at the PAZ 5 inner boundary reaches approximately 100 mrem.

The proposed SONGS PAR methodology will meet the guidance found in RIS 2005-08, which indicates that the PAR for a declared GE is to "EVACUATE at least 2 miles around and 5 miles downwind" by evacuating PAZ 1 and 3 or 4 populations depending on wind direction. If the wind direction is towards PAZ 2, it will be evacuated since it encompasses the Pacific Ocean and it is not reasonable to shelter any population that may be on the ocean. PAZ 5 will be evacuated or sheltered after assessing the SONGS EAB TEDE dose.

The benefit of the proposed SONGS PAR methodology is shown in the following examples:

Example 1

It is the summer, in the middle of the week, and a GE has been declared with the wind direction towards South [(the Pacific Ocean) (PAZ 2)]. A PAR to evacuate has been formulated. Under the current SONGS PAR methodology the PAR is to evacuate the entire EPZ, which is approximately 193,800 people. Using the proposed PAR methodology, the PAR would be to "evacuate PAZ 1 (approximate population of 18,000) and PAZ 2 (the Pacific Ocean).

Example 2

It is the summer in the middle of the week and a GE has been declared with the wind direction towards the North-Northwest (PAZ 4). A PAR to evacuate has been formulated. Under the current SONGS PAR methodology the PAR is to evacuate entire EPZ, which is approximately 193,800 people. Using the proposed SONGS PAR methodology would be to evacuate PAZ 1 (approximate population of 18,000) and PAZ 4 (approximate population of 75,500).

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As the examples show, the proposed PAR methodology with its combination Protective Action Zones allows the decision makers to issue a PAR for those populations that will be at risk from a radiological plume. In addition, the new methodology will maintain alignment with the Offsite Jurisdictions and SONGS thereby eliminating any need to convert a SONGS PAR into a different Protective Action Decision by the Offsite Jurisdictions.

Although NUREG-0654 does not require a PAR at a SAE, SONGS concluded that a SAE default PAR to “Evacuate the State Beach”, which is adjacent to the Owner Controlled Area, is appropriate because of close proximity of the beachgoers to the plant. The proposed revision to the SONGS PAR methodology keeps the SAE default PAR of “Evacuate the State Beach.”

Having a SAE default PAR to “Evacuate the State Beach” has the concurrence of the Interjurisdictional Planning Committee (IPC), which consists of the primary offsite agencies, and SONGS.

The new methodology does eliminate the SAE PAR “Shelter the entire EPZ” if a dose value of 170 mrem TEDE at the Exclusion Area Boundary (EAB) is measured or projected. A PAR at the SAE is not required per NUREG-0654 and sheltering the entire EPZ at a SAE is overly conservative. Also, the possibility of having 170 mrem TEDE at the plant EAB without being in a General Emergency is unlikely as the plant conditions would more than likely require the loss of 2 barriers and the potential or actual loss of the third barrier for the dose at the EAB to reach 170 mrem.

The current PAR methodology used to determine whether to make a shelter or evacuation PAR for the entire EPZ requires SONGS to estimate the release duration and then compare the release duration to the evacuation time estimate, which ranges from 6.75 hours to 8.25 hours (depending on the time of day and the weather conditions). This could result in the most at risk population (the zero to 2 mile population), being sheltered up to 8.25 hours in a radiological plume. The proposed SONGS PAR methodology would eliminate this possibility and evacuate the 2-mile population if the duration of the radiological release is greater than an hour (a “puff” release).

NUREG-0654 and NRC RIS 2004-13 state that for a GE the preferred initial protective action is to evacuate immediately about 2 miles in all directions from the plant. RIS 2004-13 also states, “that sheltering may be the appropriate action for controlled releases of radioactive material

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from the containment, if there is assurance that the release is short term and the area near the plant cannot be evacuated before the plume arrives.”

The proposed PAR methodology implements RIS 2004-13 by considering a radiological release less than 1 hour in duration and under the control of plant personnel as a controlled release. In this situation, a shelter PAR for PAZ 1 and the downwind zone would be issued (again PAZ 2 is the exception regarding sheltering since it is not deemed reasonable to shelter any population on the ocean). For any other actual or projected radiological release, the new PAR is to evacuate PAZ 1 and the affected downwind PAZ. Note: The State Beach, which is immediately adjacent to the SONGS Owner Controlled Area, is always evacuated during an Alert with a radiological release or a Site Area Emergency or a General Emergency.

PAZ 5, which is made up of the cities of Dana Point and San Juan Capistrano and begins approximately 7 miles from SONGS, will be issued a PAR when the wind direction is towards PAZ 5 with an actual or projected dose of 5000 mrem TEDE at the EAB. The current PAR methodology would evacuate both of these cities at a GE regardless of the direction of the radiological plume or the dose consequence to the population. Using the dose of 5000 mrem TEDE at the EAB is equivalent to having approximately 100 mrem TEDE at the PAZ 4/PAZ 5 boundary. This ensures that the PAZ 5 population will be evacuated prior to being impacted by a one rem TEDE dose, which meets EPA 400 guidance. This change eliminates the potential for an unnecessary evacuation of Dana Point and San Juan Capistrano.

The current SONGS PAR methodology recommends ingestion of Potassium Iodide (KI) whenever an actual or projected event related radiological release involves any amount of radioactive iodine. The new PAR methodology simplifies this philosophy with the agreement of the SONGS offsite health officials by recommending “Ingest KI” during any GE.

According to RIS 2005-08, “A licensee may use the NEI guidance to change its emergency plan; however, the licensee should assure the plan is coordinated with offsite response organizations.” The IPC, which SONGS is a part of, has gained concurrence from the Primary Offsite Decision Makers for the new PAR methodology. Refer to Section 6.0 of this document.

The new SONGS PAR methodology meets RIS 2003-12. This is because of the prompt evacuation of the population near the plant (the

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State Beach and PAZ 1) and the additional evacuations, PAZs 2, 3, or 4, based on wind (plume) direction. PAZ 5 will be evacuated only after assessing the radiological conditions at the EAB and the wind (plume) direction.

SO123-VIII-10.3, Precaution 4.2 says, "Do not remove or reduce a PAR once it has been implemented unless the threat is fully under control." This portion of SO123-VIII-10.3 is not being revised, so will continue to meet RIS 2003-12.

The new SONGS PAR methodology meets RIS 2004-13 by having a sheltering PAR in the event evacuation is not possible due to known impediments. A shelter PAR would also be made if the radiological release were less than an hour in duration and controlled by plant personnel. The only zone that would not be sheltered is PAZ 2 since it consists of the Pacific Ocean with no permanent population and sheltering a population on the ocean is not reasonable.

The proposed revision to the current SONGS PAR methodology will have predetermined PARs in accordance with NUREG-0654. These PARs will be initiated at the declaration of an Alert under specific conditions (an event related radiological release or a security event) and always at a SAE and GE. This exceeds the requirements of NUREG-0654.

The proposed SONGS PAR methodology uses Protective Action Zones, similar to ERPA's, to improve alignment with Keyhole PARs as described in EPA 400's Protective Action Guidance.

SONGS current EAL structure as implemented in SO123-VIII-1 "Recognition and Classification of Emergencies", (Tabs B4, C4, D4, and E4) addresses Information Notice 83-28 concerns in that a GE is declared with the loss of the two fission product barriers and the third fission product barrier being challenged. The new PAR methodology will not impact these EALs and PARs will still be required to be made within 15-minutes of the declaration of a GE.

All Federal PAR requirements will be met by using the proposed new PAR alternative methodology. The proposed SONGS PARs were developed in cooperation with offsite agencies, decision makers, and were agreed to by all parties.

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SECTION 2.0: Regulatory Guidance

The regulatory requirements, standards, and guidance involving PARs are as follows:

NUREG-0654 states that the "purpose of the general emergency declaration is to (1) initiate predetermined protective actions for the public."

EPA 400 sets the expected Protective Action Guidance (PAG) to be made. This is what is typically called the Keyhole PAG (evacuation of zero to 2-miles and downwind from 2 to 10-miles with one sector on either side of the effected sector also being evacuated).

EPA 400, sections C.2.1.1.6.1 and C.2.1.1.6.2 further state, "All people within a 2-mile radius of the incident are evacuated for all scenarios." "People are also evacuated from a downwind area bounded by equivalent rays on either side of the center line of the plume, which define the angular spread (70, 90, or 180 degrees) of the area evacuated by an arc at the distance beyond which the evacuation dose would not be exceeded on the plume centerline."

NRC RIS 2005-08 provides a PAR flowchart for a declared GE that states, "EVACUATE at least 2 miles around and 5 miles downwind." It also states to "Continuously assess plant meteorological and radiological conditions" and "revise initial PARs based on EPA PAG's, field data and changing met conditions."

NRC RIS 2003-12 states "the licensee and the State and local officials should continue assessing the situation including the development of dose projections and performing field monitoring. These assessments should be used to determine if the protective actions should be expanded." "(Withdrawal of protective actions from areas where they have already been implemented is usually not advisable during early phase because of the potential for changing conditions and confusion.)" "Severe accident studies have led the NRC staff to conclude that prompt evacuation is preferred to sheltering the population near the plant, barring any constraints to evacuation."

NRC RIS 2003-13 states, "The NRC staff has identified a generic misinterpretation of the regulatory requirement to include sheltering in a licensee's range of protective action recommendations (PARs) consistent with Federal guidance. The NRC staff has found that some emergency plans specifically state that the licensee will provide only evacuation as a PAR." "Federal guidance states that sheltering may be

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the appropriate action for controlled releases of radioactive material from the containment, if there is assurance that the release is short term (puff release) and the area near the plant cannot be evacuated before the plume arrives.”

NRC Information Notice 83-28 states, “In many cases, it has been found that licensees have not fully understood one aspect of the protective action decision making guidance regarding provisions for making offsite recommendations based on precursors of a release (i.e., core and containment status). The Federal guidance on the protective actions to be recommended to offsite officials for general emergencies is addressed in Appendix 1 of NUREG-0654/ FEMA-REP-1, Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Emergency Preparedness in Support of Nuclear Power Plants."

As indicated in Section 1.3 “Justification for the Proposed Revision (Meeting the Intent Of The PAR Federal Regulations, Standards and Guidance)” of this submittal, SONGS will continue to meet applicable regulatory guidance regarding Protective Action Recommendations with the new PAR methodology.

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Section 3.0: Current Section 6.0 of the SONGS Emergency Plan, to be Replaced

TABLE 6-4

RECOMMENDED PROTECTIVE ACTIONS TO REDUCE EXPOSURE TO A RADIOACTIVE PLUME

NOTE: The protective action recommendations presented here may be modified when information regarding offsite conditions (traffic, weather, etc.) or radiological conditions (release parameters, relative sheltering values, etc.) which would affect the value of the recommended protective action are known and can be evaluated by the EOF or TSC health physics staffs.

CONDITION	RECOMMENDATION
Total Effective Dose Equivalent is ≥ 170 mrem and < 1000 mrem <div style="text-align: center;">or</div> Thyroid Committed Dose Equivalent ≥ 170 mrem and < 5000 mrem: 1. Projected dose is at the EAB or any point up to the EPZ Boundary.	1. Evacuate State Beach <div style="text-align: center;">and</div> 2. Shelter all sectors to EPZ Boundary.
Declared General Emergency Note: TEDE ≥ 1 Rem or CDE ≥ 5 Rem measured anywhere within the EAB is a General Emergency;	1. Evacuate State Beach <div style="text-align: center;">and</div> 2. Evacuate all sectors to EPZ Boundary. Note: If evacuation time is $>$ plume exposure time, then consider sheltering all sectors to EPZ boundary
Declared General Emergency with a Radioactive Release and an Iodine Source Term	1. Evacuate State Beach <div style="text-align: center;">and</div> 2. Evacuate all sectors to EPZ Boundary <div style="text-align: center;">and</div> 3. Ingest Potassium Iodide within the EPZ Boundary

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Section 3.0: Current Section 6.0 of the SONGS Emergency Plan to be Replaced
(Continued)

EVACUATION TIME

NOTE: ~~Evacuation times are in hours. Estimates are for elapsed time between public warning and the crossing of the EPZ Boundary by the last exiting vehicle. CAUTION: CONSIDER SHELTERING IN LIEU OF EVACUATION IF THE EVACUATION TIME EXCEEDS PLUME EXPOSURE TIME.~~

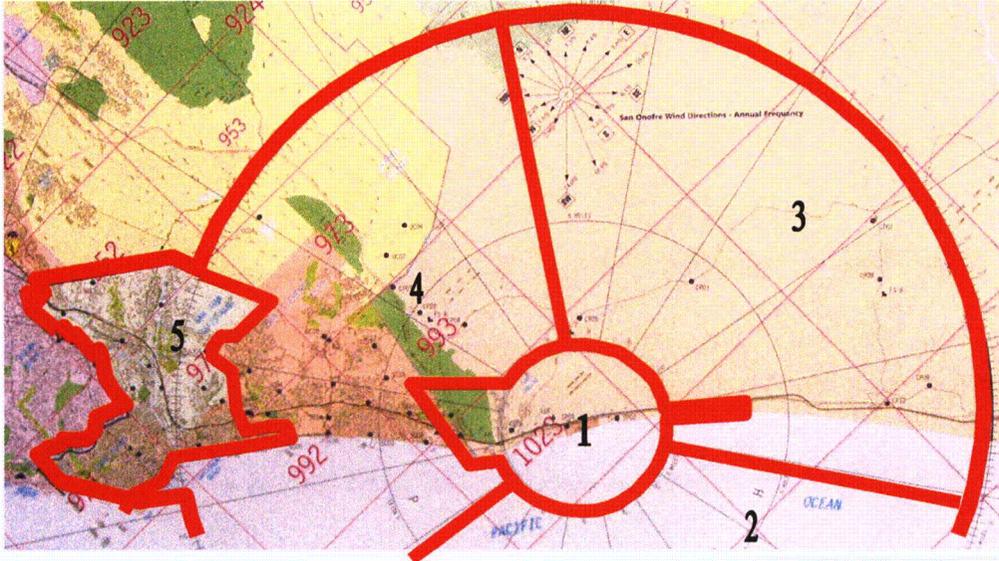
CONDITION	0 - EMERGENCY PLANNING ZONE (EPZ) BOUNDARY	
	NORTH	SOUTH
Weekend	7.00	3.00
Weekday	7.00	2.50
Nighttime	6.75	2.00
Adverse Weather	8.25	3.00

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Section 4.0: Proposed Revision to Section 6.0 of the SONGS Emergency Plan

TABLE 6-3 - PROTECTIVE ACTION RECOMMENDATION (PAR)

NOTE: The PARs presented here may be modified when information regarding offsite conditions (traffic, weather, etc.) or radiological conditions (release parameters, etc.) which could affect the value of the PAR are known and can be evaluated by the Emergency Coordinator.



Condition	Protective Action Recommendation
Unusual Event	None Required
Alert – with a security event	Evacuate the State Beach
Alert – with an event related radiological release	
Site Area Emergency	Evacuate the State Beach
General Emergency – with NO known evacuation impediments	Evacuate the State Beach. Evacuate PAZ 1 and the adjacent downwind zone(s), and ingest KI for the public in the affected PAZs. (This applies to PAZs 1, 2, 3, or 4 only)
General Emergency – with KNOWN evacuation impediments	Evacuate the State Beach. Shelter PAZ 1 and adjacent downwind PAZ(s). If wind is towards PAZ 2, then evacuate that zone. Ingest KI for the public in the affected PAZs (Applies to PAZs 1, 2, 3, or 4 only)
General Emergency – with an event related radiological release <1 hour in duration	
General Emergency – with a dose ≥ 5000 mrem TEDE at the EAB (measured or projected) and the wind towards PAZ 5, and NO known evacuation impediments	Evacuate the State Beach. Evacuate PAZ 1, 4, 5, and ingest KI for the public in those PAZs
General Emergency – with a dose ≥ 5000 mrem TEDE at the EAB (measured or projected) and the wind towards PAZ 5, and KNOWN evacuation impediments	Evacuate the State Beach. Shelter PAZs 1, 4, 5, and ingest KI for the public in those PAZs

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Section 5.0: List of Acronyms

EAB – Exclusion Area Boundary

EPA – Environmental Protection Agency

EPIP – Emergency Plan Implementing Procedure

EPZ – Emergency Planning Zone

ERPA – Emergency Response Planning Area

FEMA – Federal Emergency Management Agency

GE – General Emergency

IPC - Interjurisdictional Planning Committee

KI – Potassium Iodide

NRC – Nuclear Regulatory Commission

PAG – Protective Action Guidance

PAR – Protective Action Recommendation

PAZ – Protective Action Zone

RIS – Regulatory Issue Summary

SAE – Site Area Emergency

SCE – Southern California Edison

SONGS – San Onofre Nuclear Generating Station

TEDE – Total Effective Dose Equivalent

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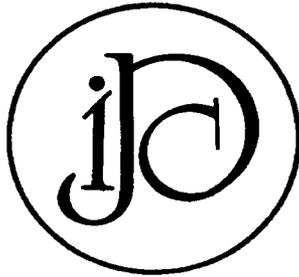
Section 6.0 Documentation of the offsite agencies concurrence with the proposed change to the PAR methodology

In California, decision-making for protective actions is performed at the local, rather than the state level. While the state of California has been briefed on this proposed change, agreement of the state of California was not required.

Provided as Attachment A is a copy of the meeting minutes of the July 19, 2006, Decision Makers Summit, which was conducted by the Interjurisdictional Planning Committee. Please note that the attached meeting minutes state that, "...The decision maker's (sic) voted unanimously to approve and support this change to the current [PAR methodology]..."

Attachment A

**Meeting minutes of the July 19, 2006
Decision Makers Summit,
Conducted by the Interjurisdictional Planning Committee**



Interjurisdictional Planning Committee

P.O. Box 4198, San Clemente, CA 92674

County of Orange • County of San Diego • City of San Clemente • City of San Juan Capistrano
City of Dana Point • California State Parks • U.S. Marine Corps • Southern California Edison

July 19, 2006 Decision Makers Summit

Attendees

Carona, Sheriff Michael	Orange County Sheriff's Department
Bishop, Steve	Orange County Sheriff's Department
Anderson, Jack	Orange County Sheriff's Department
Duensing, Terre	Orange County Sheriff's Department
Boston, Donna	Orange County Sheriff's Department
Osborn, Vicki	Orange County Sheriff's Department
Bundy, Denise	Orange County Sheriff's Department
Sanchez, Richard	Orange County Health Care Agency
Souleles, David	Orange County Health Care Agency
Rozzelle, Rich	CA Department of Parks and Recreation
Long, Steve	CA Department of Parks and Recreation
Tuck, Harold	County of San Diego, Public Safety Group
Bowen, Dr. Nancy	County of San Diego, Public Health Services
Lane, Ron	San Diego County Office of Emergency Services
Asturias, Susan	San Diego County Office of Emergency Services
Scarborough, George	City of San Clemente
Lund, David	City of San Clemente
Russell, Jim	City of San Clemente
Adams, Dave	City of San Juan Capistrano
Huber, Bill	City of San Juan Capistrano
Cantor, Mike	City of San Juan Capistrano
Chotkevys, Doug	City of Dana Point
Apodaca Sharie	City of Dana Point
Fowler, Brad	City of Dana Point
Rose, Mike	City of Dana Point
Talkington, Col Rory	Marine Corps Base Camp Pendleton
Cramer, Joe	Marine Corps Base Camp Pendleton
Fernando, Col Steve	Marine Corps Base Camp Pendleton
Ringvetski, Maj Ben	Marine Corps Base Camp Pendleton
Hyman, Capt David	Marine Corps Base Camp Pendleton
Hoover, Chief Tim	Marine Corps Base Camp Pendleton
Reilly, Jim	Southern California Edison
Newton, Howard	Southern California Edison
Culverhouse, Barbara	Southern California Edison
Ashbrook, Brian	Southern California Edison
Cleavenger, Dan	Southern California Edison
Garcia, Rick	Southern California Edison
Marsh, Stan	Southern California Edison
Clark, Ed	National Weather Service

Summary

Mike Rose, IPC Chair, moderated summit activities. Over the last eight months, the IPC has been working to change to the existing Protective Action Recommendation (PAR) methodology to create a more “risk-specific” approach to Protective Action Decision-making. These changes include the use of specific Protective Action Zones (PAZ) to replace the current default structure that requires evacuation or sheltering (with or without KI) the entire Emergency Planning Zone, even if the major population centers are not at risk.

On July 19, 2006, the IPC hosted a meeting for the primary jurisdictional decision-makers. The summit objective was to gain unanimous concurrence on the revised PAR methodology. The format was designed to stimulate open and free discussions within and among jurisdictions.

In attendance were the City Managers from the Cities of San Clemente, Dana Point, and San Juan Capistrano, the Orange County Sheriff, the Deputy Chief Administrative Office of San Diego County, the representatives of the Commanding Officer of Marine Corps Base Camp Pendleton, the Superintendent of California State Parks Orange Coast District, along with San Onofre Executives.

The IPC recommended the formation of five Protective Action Zones within the existing Emergency Planning Zone (EPZ) where protective action would be taken for PAZ 1 (roughly 2 miles around the plant) and the affected downwind PAZ(s) (PAZ 2, 3, 4, 5) as appropriate. The decision maker’s voted unanimously to approve and support this change to the current (diagram of the PAZs is attached). Discussion points follow.

Agenda

The agenda included discussion on the following:

- Review of Protective Action Recommendations (PAR)
- Review of Protective Action Decisions (PAD)
- Overview of Current PAR Structure
- Recommended Change to PAR Structure
- Implementation Timeline

Review of PARs & PADs

Mr. Rose quickly reviewed PARs and PADs. A Protective Action Recommendation is generated by SONGS and provided to offsite jurisdictions via YPS in conjunction with the declaration of an Emergency Classification.

Current PAR Structure:

- Evacuate State Beach
- Shelter-in-place to EPZ boundary
- Evacuate to the EPZ boundary
- Ingest Potassium Iodide

A PAD is a Protective Action Decision made by jurisdictional decision makers. Direction is given to the public to protect their health and welfare as agreed upon by IPC jurisdiction decision makers based on all available information, including: utility recommendation, meteorological data, impediments to an evacuation, ODAC recommendations, staff recommendations, and Health Officers.

Tabletop Exercises

A series of simulated scenarios were conducted using both the existing protective action methodology and the new risk-based protective action methodology. The exercises demonstrated the effectiveness of the recommended approach to protective action decision-making.

Reevaluation of Current Protective Action Structure

The IPC was motivated to utilize PAZ's as an efficient and risk specific way to evacuate the EPZ population, while maintaining the simplicity of geopolitical boundaries. It was noted that PAZ's are very common across the industry.

Advantages include:

- Evacuate the closest population first
- Only evacuate the affected populations
- Reduces the impact to Orange County Reception Center
- Reduces the impact to the Capistrano Unified School District
- Use existing geopolitical boundaries for Zones 4 and 5 (easier for public education and emergency communication)
- Reduces the time necessary to remove the at-risk population from the affected downwind area

Decision

Establish five Protective Action Zones. The range of protective actions would include shelter or evacuate PAZ 1 and the affected downwind PAZ(s) and ingestion of KI during General Emergency declarations.

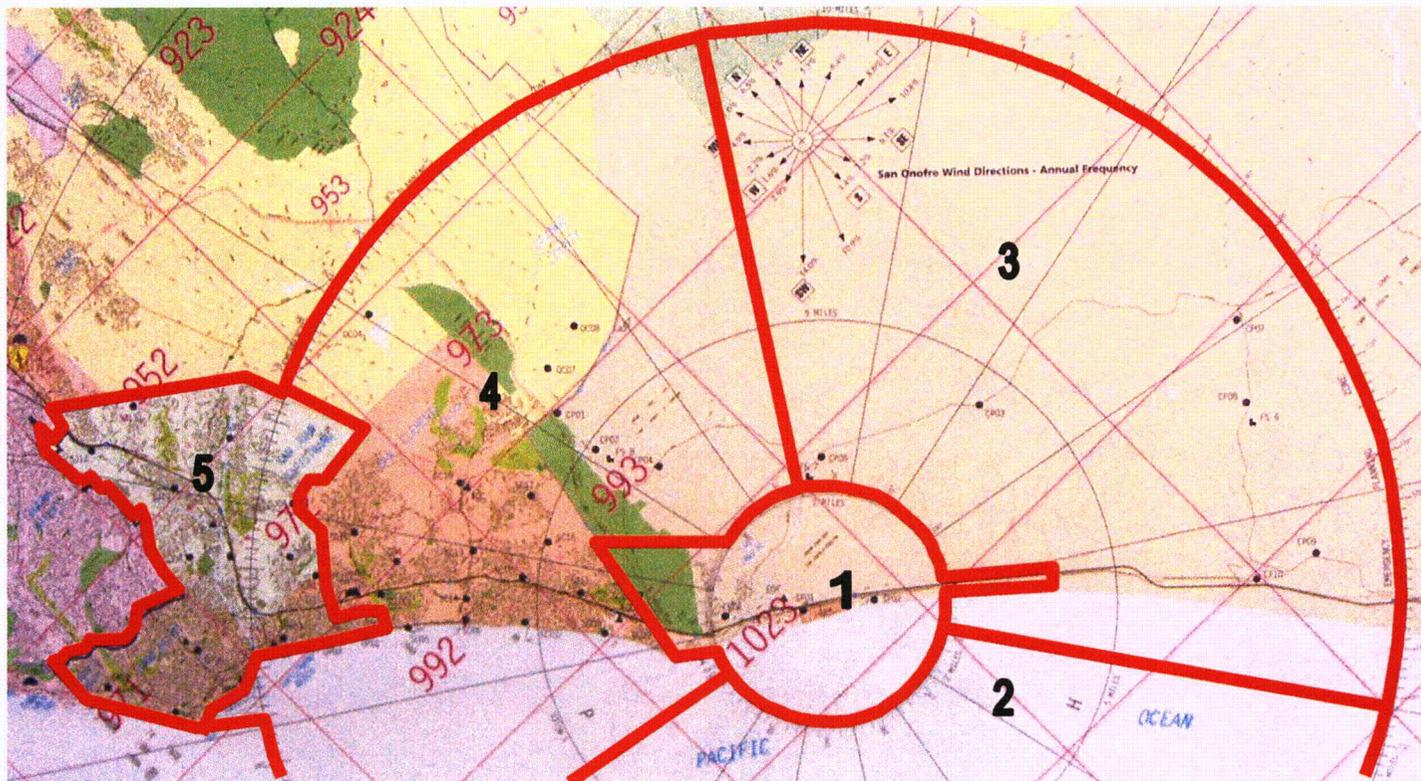
The primary decision makers unanimously concurred with the recommended Protective Action methodology.

Implementation

Mr. Rose noted that the NRC staff and commissioners have encouraged this conceptual change. Offsite implementation including plan review/revision, development of a public education program, and identification of training needs will begin immediately.

Target completion date prior to 2007 evaluated exercise cycle. The goal is to fully demonstrate new PAR structure during 2007 exercise.

Mr. Rose thanked all the participants and invited them to enjoy a scrumptious lunch.



Emergency Planning Zone Depicting the Five Protective Action Zones