



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

Mr. Clyde Osterholtz
NRC Senior Resident
Southern California Edison
P.O. Box 128, Location D1E
San Clemente, CA 92674

November 17, 2006

Dear Mr. Osterholtz:

On behalf of the San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC) I would like to ask for your support and assistance in gaining approval of a proposed emergency plan change to the Protective Action Recommendation structure for the SONGS Emergency Planning Zone.

I had the opportunity to share with the Commission some detailed information on the state of offsite emergency planning for SONGS at the public meeting May 2, 2006. During that meeting I introduced to the Commission that one of the biggest challenges we face is our current "all-or-nothing" PAR structure. For example, if San Onofre were to declare a General Emergency today and the winds were blowing directly out to sea, the PAR would be to evacuate to the EPZ boundary. That represents a 360° evacuation of approximately 160,000 – 202,000 people who are not at risk.

This past year, the IPC has been working to develop a change to the existing PAR structure which includes the use of Protective Action Zones (PAZ). This change was developed through our motivation to create a more "risk-specific" approach to Protective Action Decision-making. On July 19, 2006, the IPC hosted a meeting of our jurisdictional decision-makers. Attending were the City Managers from the Cities of San Clemente, Dana Point, and San Juan Capistrano, the Orange County Sheriff, the Deputy County Administrator of San Diego County, the Commanding Officer of Marine Corps Base Camp Pendleton, the Superintendent of California State Parks Orange Coast District, along with San Onofre Executives. This group voted unanimously to approve and support this recommended change.

The IPC has been working to make all the necessary changes to our offsite emergency response plans, public education program, EAS messages, and our Interjurisdictional Policies. Concurrently, San Onofre has developed and submitted their emergency plan change submittal package for NRC approval. Reference San Onofre submittal Docket Nos. 50-206, 50-361, 50-362 and 72-41 Request for Emergency Plan Change, Proposed Revision to the Protective Action Recommendation Methodology. Our goal is to achieve

NRC approval of this change so that we may fully demonstrate the effectiveness of this new PAR structure during our 2007 evaluated exercise cycle.

We have also invited the NRC to be an active participant in several offsite jurisdiction locations during our dress rehearsal on March 14, 2007 and evaluated exercise on April 18, 2007 to gain a better understanding of our partnership, communications and available resources during a real event. In order to exercise our updated emergency plans for these exercises, we feel that we must have NRC approval by the end of December 2006. This allows us to formally submit our offsite plan changes to FEMA/DHS in accordance with the Extent of Play timeline. We ask for your approval on this course of action and any support that you may be able to give to encourage NRC staff in the approval process. This change represents a marked improvement in the overall protection of the public's health and safety around San Onofre and we look forward to implementing it as soon as possible.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Michael Rose, Chairman
Interjurisdictional Planning Committee
City of Dana Point
(949) 248-3535

- c. Chairman Klein
- Commissioner McGaffigan
- Commissioner Merrifield
- Commissioner Jaczko
- Commissioner Lyons
- NRC Documents Control Desk
- Ken Chin, DHS
- Ben Tong, Governor's Office of Emergency Services
- Denise Bundy, Orange County Sheriff's Department Emergency Management
- Susan Asturias, San Diego County Office of Emergency Services
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- Steve Long, California State Parks and Recreation
- Joe Cramer, United States Marine Corps Base, Camp Pendleton
- Barbara Culverhouse, San Onofre Nuclear Generating Station