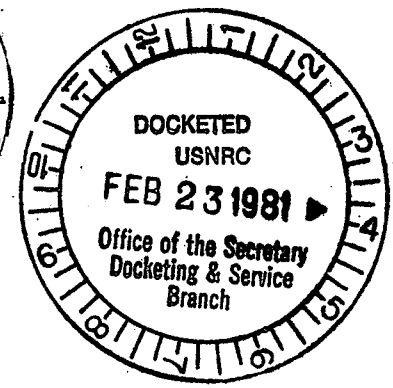


2/20/81



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Attorney for GUARD

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-361 OL
)	50-362 OL
SOUTHERN CALIFORNIA)	
EDISON COMPANY, et al.,)	FIRST SET OF INTERROGATORIES
(San Onofre Nuclear Generating)	TO THE NRC STAFF FROM GUARD
Station, Units 2 and 3).)	

TO: THE NRC STAFF:

Intervenors in the above-entitled action hereby request that you answer the following set of interrogatories under oath, by an officer or authorized agent, within fourteen (14) days of service hereof, pursuant to Title 10, Part 2, Section 2.740b of the Code of Federal Regulations.

INSTRUCTIONS AND DEFINITIONS

For the purposes of these Interrogatories and your responses thereto, the following definitions and instructions shall apply:

(a) The terms "NRC", "you", "your" refer to the Nuclear Regulatory Commission Staff responding to these Interrogatories.

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1 (b) The term "person" means any natural person and
2 any private or public entity of any nature, including without
3 limitation, corporations, firms, partnerships, sole proprietor-
4 ships, associations, groups, organizations, trusts and estates.

5 (c) The term "document" means:

6 (1) The original, or

7 (2) If the original is not in your custody or
8 under your control, then a copy thereof.

9 (d) As used herein, unless the context otherwise
10 requires, the singular number includes the plural and the plural
11 includes the singular; the masculine gender includes the
12 feminine, and the feminine includes the masculine.

13 (e) When you are requested to "identify" any docu-
14 ment you shall include in your response a description sufficient
15 to satisfy the "reasonable particularity" requirement found in
16 Title 10, Part 2, Section 2.741(c) of the Code of Federal
17 Regulations, including without limitation the following
18 information with respect thereto:

19 (1) The nature of the document;

20 (2) Its date;

21 (3) The names of its addressor(s) and
22 addressee(s), if any;

23 (4) The name(s) of the person(s) who prepared it;

24 (5) The name(s) and address(es) of the present
25 custodian(s) of the original and any copies thereof; and

26 (6) A summary of its contents.

27 In lieu of providing the information specified in Paragraph (e),

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1 Items (1)-(6), you may attach to your responses to these Inter-
2 rogatories a true copy of such document, identifying the Inter-
3 rogatory to which it is responsive and stating in your answer
4 only such of the information specified in Paragraph (e), Items
5 (1)-(6) as does not clearly appear on the face of such document.

6 If you claim a document is privileged or attorneys'
7 work product, describe the same generally and state all facts
8 upon which you base the claim of privilege or the claim such
9 document constitutes attorneys' work product.

10 (f) When you are requested to "identify" any person,
11 you shall set forth the full name and last known business
12 address, residence address, and employer of such person you are
13 asked to identify.

14 (g) When you are requested to "identify" an "event"
15 you shall include in your response a description sufficient to
16 satisfy the "reasonable particularity" requirement found in
17 Title 10, Part 2, Section 2.741(c) of the Code of Federal
18 Regulations, including without limitation the following infor-
19 mation with respect thereto:

- 20 (1) The general nature and description of the
21 event;
22 (2) The time of the event;
23 (3) The place of the event;
24 (4) Persons involved in the event; and
25 (5) Available documentation of the event.

26 (h) The term "expert" refers to a person who by
27 virtue of his knowledge, skill, experience, training or educa-
28 tion has acquired a scientific, technical or specialized

1 knowledge which can assist the Nuclear Regulatory Commission
2 Atomic Safety and Licensing Board in understanding the evidence
3 or determining a fact, opinion, or scientific theory relevant
4 to an issue in this proceeding.

5 (i) When you are requested to "identify" an "expert"
6 as that latter term is defined in Paragraph (h) above, you shall
7 set forth the full name and last known business address,
8 residence address, academic affiliations, and present employer
9 of each such "expert" you are asked to identify.

10 (j) In answering these Interrogatories, you shall
11 furnish all information available to you, your respective agents,
12 employees, investigators, representatives and attorneys, and
13 not merely such information as is known from personal knowledge.

14 (k) The term "SONGS 2 and 3" refers to the San
15 Onofre Nuclear Generation Station, Units 2 and 3.

16 (l) The term "NRC" refers to the United States
17 Nuclear Regulatory Commission; the term "ASLB" refers to the
18 NRC's Atomic Safety and Licensing Board before whom contentions
19 in this proceeding, not otherwise withdrawn, are to be adjudi-
20 cated.

21 (m) Where these Interrogatories ask whether you have
22 "analyzed" or intend to "analyze" a document or subject,
23 Applicants define "analyze" to be where you or your consultants
24 have reviewed the document or subject in the context of SONGS
25 2 and 3 and have produced or intend to produce a written report
26 of that review.

27 (n) The term "EP" refers to the "SONGS 2 and 3
28 Emergency Plan, July, 1980" provided by Applicants' counsel to

1 Intervenor's counsel on January 20, 1981, and served on all the
2 parties hereto on February 3, 1981.

3 (o) The term "State Plan" refers to the "State of
4 California, Nuclear Power Plant Emergency Response Plan", as
5 revised August, 1978, prepared by the State Office of Emergency
6 Services and the State Department of Health Services; the term
7 "Orange Plan" refers to the "Orange County Response Plan, San
8 Onofre Nuclear Generating Station, December, 1980", prepared
9 and coordinated by the Orange County Emergency Services Division
10 of the General Service Agency; the term "San Diego Plan" refers
11 to the "Unified San Diego County, Nuclear Power Plant Emergency
12 Response Plan, December, 1980", prepared and coordinated by the
13 Unified San Diego County Emergency Services Organization; the
14 term "Parks Plan" refers to the "Nuclear Power Plant Emergency
15 Response Plan, San Onofre, San Clemente and Doheny State Park
16 and Beach Areas, December, 1980", prepared and coordinated by
17 the State Department of Parks and Recreation, Pendleton Coast
18 Area; the term "USMC Plan" refers to the "Emergency Response
19 Plan (Marine Corps Base, Camp Pendleton, California) 1-79," as
20 revised by Base Order P3440.1 Ch. 1, prepared and coordinated
21 by the United States Marine Corps. Camp Pendleton; the term
22 "San Juan Capistrano Plan" refers to the "San Juan Capistrano
23 Radiological Emergency Response Plan, San Onofre Nuclear Gener-
24 ating Station, December, 1980" prepared and coordinated by the
25 City of San Juan Capistrano Public Works Department; the term
26 "IAEP" refers to the "Interagency Agreement and Evacuation
27 Procedure for the San Onofre Plume Exposure Pathway Emergency
28 Planning Zone, December, 1980", which is incorporated by

1 reference in each of the radiological emergency plans, described
2 above, with the exception of the State Plan. Each of the emergency
3 response plans referred to in this paragraph have been provided
4 by Applicants' counsel to Intervenor's counsel on January 20,
5 1981 and were served on all the parties hereto on February 3,
6 1981. Unless stated otherwise, the term "Plans" shall refer to
7 all of the plans included in this Paragraph (o).

8 (p) The term "offsite assistance agencies" refers
9 generally to all federal, state, and local governmental agencies
10 with jurisdiction to respond in any manner in the event of a
11 radiological emergency at SONGS 2 and 3.

12 (q) The term "Federal Requirements" refers to the
13 current NRC emergency planning regulations set forth in 10 C.F.R.
14 §§ 50.33, 50.47, 50.54 (q) (r) (s) (t) and (u); and 10 C.F.R., Part
15 50, Appendix E.

16 (r) The term "GE" refers to a general emergency.

17 (s) The term "EPA PAGs" refers to the Environmental
18 Protection Agency's Protection Action Guides.

19 (t) The term "90°N Sector" refers to the 90° Northern
20 Sector.

21 (u) The terms "response agencies", "state and local
22 agencies", and "state and local jurisdictions" refer to those
23 persons at the state and local level responsible for emergency
24 planning and implementation of emergency response.

25 (v) Omit Interrogatories No. 5, No. 14(a), and No. 16.

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1
2 INTERROGATORIES

3 INTERROGATORY NO. 1:

4 Describe an event initiating a GE and culminating in
5 a release of radiation which exceeds EPA PAGs for whole body
6 exposure for which evacuation of the 90°N Sector up to five (5)
7 miles from the plant is the appropriate protective measure to
8 be taken. For this postulated accident, identify and discuss:

9 (a) Initiating condition(s) capable of creating this
10 GE.

11 (b) All factors supporting a decision to evacuate
12 as opposed to a decision to take other protective measures not
13 including evacuation.

14 (c) All factors, including but not limited to pro-
15 jected level of radiation exposure (specify level), meteoro-
16 logical conditions (specify conditions), sufficient time for
17 evacuation (specify time), etc. which support the decision to
18 evacuate the 90°N Sector.

19 (d) The geographical area involved in this evacuation
20 as well as the governmental jurisdictions involved in imple-
21 menting evacuation and receiving evacuees.

22 (e) The estimated maximum number of persons who
23 would be evacuated.

24 (f) The estimated length of time it would take to
25 evacuate the 90°N Sector under ideal conditions.

26 (g) The estimated length of time it would take
27 to evacuate the 90°N Sector if Interstate 5 were incapacitated
28 by a collapsed freeway overpass near Camino de los Maria
interchange.

1 (h) The estimated time between the time that the
2 Site Emergency Coordinator declares a general emergency and the
3 time that evacuation is actually begun.

4 (i) (i) The names and addresses of all licensed
5 health care facilities in the 90°N Sector.

6 (ii) The names and addresses of licensed and
7 unlicensed community care facilities of all categories in
8 90°N Sector.

9 (j) (i) The estimated number of ill, elderly, or
10 infirm persons in licensed health care facilities requiring
11 special evacuation by stretcher/ambulance.

12 (ii) The estimated time required for transferring
13 these ill, elderly, or infirm persons to appropriate sites
14 outside of the 90°N Sector.

15 (k) (i) The estimated number of persons who are
16 residents of licensed and unlicensed community care and
17 board and care homes in this 90°N Sector who would also
18 require special evacuation.

19 (ii) The estimated time required for transferring
20 these persons to appropriate sites outside the 90°N Sector.

21 (l) The effect, if any, of these "special evacuations"
22 on time estimates for total evacuation of the 90°N Sector as
23 given in (f) and (g) above.

24 INTERROGATORY NO. 2:

25 Describe an event initiating a GE and culminating in
26 a release of radiation which exceeds EPA PAGs for which evacu-
27 ation of any sectors within the plume exposure pathway is not
28 the appropriate protective measure. Specify:

1 (a) Initiating condition(s).

2 (b) Factors which support a decision not to evacuate
3 off-site populations.

4 (c) Maximum levels of whole body and thyroid dose
5 exposure rates which are projected within the plume exposure
6 pathway along its radii at two (2) miles, five (5) miles, and
7 ten (10) miles from the plant.

8 (d) Protective measure which would be instituted.

9 INTERROGATORY NO. 3:

10 (a) What mechanical devices, systems or other aids
11 are now in place or planned to be installed to insure the
12 simultaneous notification of all state and local response
13 organizations warning points that an accident has occurred?

14 (b) How is this system(s) protected from breakdown
15 caused by floods, power outages, subscriber overloading, etc.?

16 (c) How are acknowledgment and verification insured
17 at each response organization?

18 (d) Is voice verification supported by written copy
19 verification?

20 (e) For each offsite response agency, provide the
21 name and title of the person to be notified in case of a GE.

22 (f) What is the estimated amount of time anticipated
23 between the first notification of state and local response
24 organizations and the first follow-up message which will
25 contain information concerning the speed and direction which
26 the plume will travel as well as the actual or projected exposure
27 to radiation, whole body and thyroid, and protective measures
28 recommended?

1 (g) What coordinated arrangements will be used by
2 each organization for dealing with rumors? By whom and by
3 what criteria shall the content of press releases be reviewed
4 prior to releasing information to the public during an emergency?

5 INTERROGATORY NO. 4:

6 (a) Describe the type, number and location of all
7 devices which are planned to be installed for the purpose of
8 notifying the public within the plume exposure pathway EPZ that
9 an emergency exists.

10 (b) What effect will power outages within the ten
11 (10) mile EPZ have on the capability of the early warning system
12 to function as designed?

13 (c) What is the anticipated cost of the devices, and
14 of their installation?

15 (d) Who will bear the cost of these devices and of
16 their installation?

17 (e) What is the anticipated yearly cost of maintaining
18 these devices?

19 (f) Who will bear the cost of maintaining these
20 devices?

21 (g) If the answer to (d) and/or (f) is "Applicant",
22 are these costs to be factored into the rate base as part of
23 the capital expenditure for the plant units?

24 (h) What is the projected date that this system will
25 be in place?

26 INTERROGATORY NO. 5:

27 For each of the jurisdiction within the entire ten (10)
28 mile EPZ plume exposure pathway, provide the name, title, and

1 address of the person having the authority to order evacuation
2 when it has been recommended by the licensee.

3 INTERROGATORY NO. 6:

4 What systems, policies and guidelines are in place
5 to resolve disputes within and among local jurisdictions
6 concerning the indications for evacuation in doubtful cases.

7 INTERROGATORY NO. 7:

8 In the event that evacuation has been undertaken and
9 the levels of projected radiation exposure thereafter increase
10 by a large factor over original projections, so that EPA PAGs
11 are substantially exceeded for the evacuees en route to the
12 EPZ borders, what protective actions are planned to mitigate
13 the threat to the public health?

14 INTERROGATORY NO. 8:

15 Do the plans under consideration in this licensing
16 proceeding take into account the likelihood of "spontaneous"
17 evacuation outside the ten (10) mile EPZ plume exposure pathway
18 which may interfere with efforts within the EPZ? If so, how?

19 INTERROGATORY NO. 9:

20 Do the plans under consideration in this licensing
21 proceeding take into account the likelihood of "spontaneous"
22 evacuation within the ten (10) miles EPZ plume exposure pathway
23 but outside of the sector or zone for which evacuation has been
24 recommended? If so, how?

25 INTERROGATORY NO. 10:

26 Explain how spontaneous evacuation by the public will
27 be discouraged.

28 ///

1 INTERROGATORY NO. 11:

2 Have arrangements been made for appropriate reception
3 centers for evacuees from licensed health facilities, licensed
4 community care facilities, and other populations requiring
5 specialized care? If so, state the nature of the arrangements,
6 the name(s) of the persons responsible for implementing them,
7 and the addresses where these evacuees requiring special care
8 will be recieved.

9 INTERROGATORY NO. 12:

10 What provisions have been made for securing
11 adequate supplies of thyroid blocking agents for the population
12 around SONGS 2 and 3? What drug will be used? Are any written
13 agreements in existence? If so, provide copies. What is the
14 name of the vendor who will supply? How will it be stored and
15 distributed? Are supplies presently available if needed?

16 INTERROGATORY NO. 13:

17 (a) Regarding the public information program, what
18 provisions have been made with the phone company for inclusion
19 of emergency information pertinent to a nuclear emergency in
20 the phone book?

21 (b) Provide a sample of proposed copy, if developed,
22 as well as copies of any agreements which have been made with
23 the phone company concerning inclusion of such information.

24 (c) What information will be included in programs
25 to acquaint new media with emergency plans and information
26 concerning radiation?

27 (d) Will the information include reference to the
28 harmful long-range effects of low level radiation?

1 (e) Will the public receive information concerning
2 the Price-Anderson Act?

3
4 INTERROGATORY NO. 14:

5 (a) Have you offered funding or technical assistance
6 to any of the state and/or local agencies who have been involved
7 in developing the response plans for a nuclear accident at
8 SONGS 2 and 3?

9 (b) What budget allocations have been made by each
10 of the state and/or local agencies for which plans have been
11 prepared to meet the planning effort involved?

12 (c) What budget allocations have been made by
13 these state and local agencies to review and update the plans
14 currently under consideration?

15 (d) For each of the state and local agency plans,
16 provide the names, addresses, and titles of persons with whom
17 you worked in developing the plans and the dates of all meetings
18 at which you worked with these persons or their representatives
19 on developing the plans.

20 INTERROGATORY NO. 15:

21 Is it your position that the plans as submitted
22 represent mutual understanding and acceptance by and among all
23 of the state and local jurisdictions of their responsibilities
24 for safeguarding the public health and safety in the event of
25 a nuclear accident? Provide documentation for your position.

26 INTERROGATORY NO. 16:

27 (a) Do you plan to obtain radiological laboratory
28 services from a laboratory closer than LFE Environmental Analysis

1 Laboratories in Richmond, Calif.?

2 (b) If not, why not?

3 INTERROGATORY NO. 17:

4 (a) For each 90° Sector, locate and describe shelters
5 which could be used by the public in a general emergency to
6 reduce the risk of exposure to radioactive contamination.

7 (b) What arrangements have been made to secure access
8 to these shelters in case of a General Emergency?

9 (c) What is the estimated degree of protection from
10 the risk of exposure to whole body and thyroid contamination
11 in excess of EPA PAGs which is afforded by these shelters?

12 (d) In each of the shelters described above, how
13 many persons can be accommodated and for how long?

14 INTERROGATORY NO. 18:

15 (a) Is it your position that the present "state of
16 the art" of equipment for monitoring post-accident levels of
17 radioactive materials is sufficiently developed to assure
18 accurate measurements of releases of various radionuclides
19 and projection of dose exposure rates for whole body and
20 thyroid exposure for a spectrum of accidents ranging from
21 "moderately serious" to "worst case" accidents at various
22 atmospheric levels?

23 (b) If your answer is "yes," provide current data
24 in support of the reliability of "state of the art" monitoring
25 equipment.

26 (c) If your answer is "no," describe the areas in
27 which inaccuracies in detecting, monitoring and projecting levels

28 ///

1 of inaccuracies are most likely to occur along the spectrum
2 of accidents referred to in (a) above.

3 INTERROGATORY NO. 19:

4 (a) To what extent is radiation measurement
5 instrumentation which is now in place both onsite and offsite
6 at, above, or below the current "state of the art" of radiation
7 measurement instrumentation?

8 (b) Provide a table which identifies, locates and
9 classifies radiation measurement instrumentation both onsite
10 and offsite as at, above, or below the current state of the art
11 for such equipment for all equipment within the 10 mile EPZ
12 plume exposure pathway and the 50 mile ingestion exposure path.

13 INTERROGATORY NO. 20:

14 State the assumptions upon which the exclusion of
15 women, but not of men, of reproductive age from emergency
16 work is based.

17 INTERROGATORY NO. 21:

18 Provide age data which gives the age range, the mode,
19 the mean and the standard deviation for all onsite workers
20 in the following categories:

21 (a) Men

22 (b) Women

23 (c) Men and women combined.

24 INTERROGATORY NO. 22:

25 Provide the data requested in INTERROGATORY NO. 21 for
26 all offsite health personnel, hospital based and otherwise, who
27 will be involved in work with contaminated injured or ill
28 persons and who are likely to be exposed to levels of radiation

1 in excess of EPA PAGs .

2 INTERROGATORY NO. 23:

3 Provide the data requested in INTERROGATORY NO. 21 for
4 all emergency workers from the various state and local response
5 agencies who will be likely to be exposed to levels of radiation
6 in excess of EPA PAGs.

7 INTERROGATORY NO. 24:

8 In each of the state and local emergency response
9 agencies, what commitments are in place to assure adequate
10 numbers of emergency workers to protect the public health and
11 safety for workers who are likely to be exposed to levels of
12 radiation in excess of EPA PAGs?

13 INTERROGATORY NO. 25:

14 In each of the hospitals listed as capable of treating
15 radioactively contaminated patients, what commitments are in
16 place for assuring that adequate numbers of health personnel
17 to care for injured or ill contaminated patients will agree to
18 remain on duty and be exposed to increased risk of contamination
19 with radioactivity?

20 INTERROGATORY NO. 26:

21 (a) Have any mutual aid agreements specific to
22 nuclear power plant emergencies been entered into by and among
23 the response agencies and/or Applicant?

24 (b) If so, give the names of the parties to the mutual
25 aid agreements and the effective dates of the agreements.

26 (c) Provide copies of any and all mutual aid agreements
27 which you have in your possession.

28 ///

1 INTERROGATORY NO. 27:

2 Provide the names and addresses of all persons in
3 the various response agencies who have taken courses in radio-
4 logical monitoring, the location and date of their training
5 in radiological monitoring, the number of hours of the training,
6 and the qualifications of the persons providing the training,
7 and whether the persons listed herein as trained in radiological
8 monitoring are committed to serving the public health and
9 safety as radiological monitoring personnel in the event of a
10 nuclear accident at SONGS 2 and 3.

11 INTERROGATORY NO. 28:

12 Provide the names and addresses of all health personnel
13 within the 10 mile EPZ plume exposure pathway and the 50 mile
14 ingestion exposure pathway who have had special training in
15 decontamination of injured or ill persons, and who are qualified
16 to undertake the care and supervision of care of such patients.
17 Provide the location, dates, and hours of their training, and
18 the qualification of their instructors, and the availability of
19 these specially trained health personnel in the event of a
20 nuclear accident at SONGS 2 and 3.

21 INTERROGATORY NO. 29:

22 Provide the dates, times and extent of all drills and
23 exercises which are planned to test the adequacy of the planning
24 effort and its integration and coordination among the various
25 state and local agencies and the applicants, as well as any
26 and all documents, memoranda, and correspondence which has passed
27 between Applicants and any of the state and local response agencies
28 and/or Federal agencies responsible for concurring in plan adequacy

1 which critiques, analyzes, comments upon or assesses any drill
2 or exercise which has already taken place to test the adequacy
3 of the emergency response plans, in any respect.

4 INTERROGATORY NO. 30:

5 Provide cost data which demonstrates the cost to the
6 Applicants of the planning, equipment purchase, training, testing
7 and evaluating of personnel, systems, and equipment necessary
8 in order to attempt to meet the criteria which have been set
9 forth in NUREG-0654 FEMA REP-1 Rev. 1.

10 INTERROGATORY NO. 31:

11 (a) What is the status of the interagency Task Force
12 on Emergency Instrumentation (offsite) report?

13 (b) To what extent must its recommendations be adapted
14 prior to issuance of a license for SONGS 2 and 3?

15 (c) Provide a summary of the recommendations of this
16 task force as soon as available.

17 INTERROGATORY NO. 32:

18 (a) What is the status of the Federal Radiological
19 Monitoring and Assessment Plan?

20 (b) How are its recommendations integrated into
21 Applicant's response plans and the response plan of the state and
22 local agencies?

23 INTERROGATORY NO. 33:

24 (a) What is the status of the FEMA review of the
25 Applicant's Emergency Plan and those of the state and local
26 agencies which it must review?

27 (b) Specify any and all recommendations for improve-
28 ment, express reservations, disapproval or other negative comments

1 which FEMA has or shall communicate to you concerning the
2 Emergency Plan of Applicant and/or the State of California as
3 well as the several local jurisdictions whose plans have been or
4 will be served on parties in this proceeding.

5 (c) Provide any and all documents, memoranda, or corres-
6 pondence from FEMA to NRC related to FEMA's review of these plans.

7 INTERROGATORY NO. 34:

8 (a) Are any radiological laboratory services available
9 at a shorter time and space distance which are comparable to
10 those currently provided by LFE Environmental Analysis Labora-
11 tories?

12 (b) Regarding the distance of the Richmond Radiologi-
13 cal Laboratory, does the Staff recommend obtaining radiological
14 services closer to the site of SONGS 2 and 3?

15 (c) Is the public safety compromised by the distance
16 of the radiological laboratory plan from the site of SONGS 2
17 and 3?

18 INTERROGATORY NO. 35:

19 To what extent have Applicants' Plan and the other plans
20 met the burden of providing alternative evacuation routes in the
21 event of inclement weather, high traffic density and specific
22 radiological conditions?

23 INTERROGATORY NO. 36:

24 Where is the "site boundary" of SONGS 2 and 3 in relation
25 to the beach?

26 DATED: February 20, 1981

27
28

Phyllis M. Gallagher
PHYLLIS M. GALLAGHER
Attorney for GUARD

PROOF OF SERVICE BY MAIL

I declare that:

I am employed in the City of Anaheim, California.

I am over the age of eighteen years and not a party to the within entitled action; my business address is 1695 West Crescent, Suite 222, Anaheim, California 92801.

On February 20, 1981, I served the attached "FIRST SET OF INTERROGATORIES TO THE NRC STAFF FROM GUARD" on the following in said cause, by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid, in the United States mail at Anaheim addressed as follows:

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