

4/8/81

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

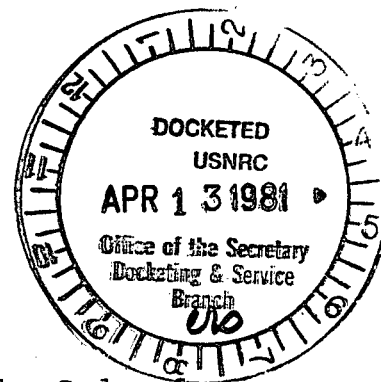
In the Matter of)

SOUTHERN CALIFORNIA EDISON COMPANY,)
ET AL.)

(San Onofre Nuclear Generating Station,)
Units 2 and 3))

Docket Nos. 50-361 OL
50-362 OL

INTERVENOR, FOE ET AL.
ANSWERS TO FOURTH SET OF INTERROGATORIES
PROPOUNDED BY SOUTHERN CALIFORNIA EDISON



TO: SOUTHERN CALIFORNIA EDISON COMPANY, et al."

Pursuant to Title 10, Part 2, Section 2.7406 of the Code of Federal Regulations, Intervenor, Friends of the Earth, et al., in the above-entitled action hereby respond to "Fourth Set of Interrogatories to Intervenor, Friends of the Earth, Mr. and Mrs. August Carstens" which were served by mail on Intervenor on February 17, 1981.

INTERROGATORY NO. 1:

At the present time do you continue to contend that the Applicants have not complied with 10 C.F.R., Part 50, Appendix E, regarding emergency plans, since because of the jurisdictional diversity of the several state and local agencies involved and their inadequate fundings and staffing, appropriate and coordinated emergency plans cannot be developed; and that an operating license should not be granted for SONGS, Units 2 and 3, because the various emergency response plans are so complex, overlapping, and difficult to implement

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that in the event of a nuclear accident the safety of person in the surrounding areas will be imperiled? If so,

(a) State each and every fact upon which you base this contention;

(b) Identify each and every document or communication upon which you base your contention;

(c) Identify each and every event upon which you base your contention;

(d) Identify each and every person with knowledge of the factual basis or bases for this contention, or on whose writing, opinions, or testimony you base this contention;

(e) Identify each and every person whom you expect to call as a witness, expert or otherwise, at the hearing on this contention before the ASLB and as to each witness so identified, please provide the following information;

(i) State the precise subject matter on which the witness is expected to testify;

(ii) State the substance of the facts and opinions to which the witness is expected to testify;

(iii) Summarize the factual and theoretical bases as well as any other grounds, for each opinion to which the witness is expected to testify.

ANSWERS TO INTERROGATORY NO. 1:

1. Yes

1(a) We base this position on the following:

1) The applicants EP does not meet Federal regulations (see question 4) nor do the EP's of the off-site agencies meet

the Federal Regulations (see question 2). If any one plan is inadequate, there can not be the coordination and integration necessary to protect public health and safety.

- 2) At this point in time, there is no State plan which has been developed based on the new Federal Regulations. All preliminary indications are that the State OES plan for San Onofre 2 and 3 will call for a plume exposure EPZ radius of approximately 20 miles and an ingestion exposure EPZ radius of approximately 50 miles. When this new State plan is developed, it will not be coordinated with the other EP's coordination with all agencies is critical. If there is no current state plan, there is no coordination.
- 3) Applicants have not provided a Public Information & Education Plan, which is central to the coordination and integration issue.
- 4) Several off-site assist agencies have not developed emergency plans; therefore, the emergency responses of these agencies cannot be considered "coordinated and integrated". The following agencies play critical roles in the emergency response and should develop EP's which are coordinated and integrated.
 - a) California Highway Patrol
 - b) U.S. Coast Guard
 - c) Oceanside
 - d) U.S. Border Patrol
- 5) No individual has been designated as the leader of the

emergency response. As the plans now read, there are several independent leaders, each responsible for his own jurisdiction. Intervenors believe a coordinated and integrated emergency response must be led by an individual who makes the final decisions, rather than multiple leaders perhaps making contradictory, uncoordinated decisions.

- 6) There are no executed agreements that assure the availability of emergency assistance resources (such as bulldozers, cranes, helicopters, etc.)
 - 7) The communications network, critical to a coordinated emergency response, is not adequate. Attachment 12 of the "Interagency Agreement and Evacuation Procedure for the San Onofre Plume Exposure Pathway Emergency Planning Zone, December 1980: (hereinafter called "IAEP") requires clarification. The routes and frequencies to be used between emergency decision centers are not clear. The necessary phone numbers are not published or listed. Communications specialists have agreed that the communication network is not understandable at the present time.
 - 8) There is no coordinated exercise and training program capable of implementation.
- 1(b)
- 1) "A Study of Postulated Accidents at California Nuclear Power Plants, Science Applications Inc., July 1980." Hereinafter "SAI Report".
 - 2) "SONGS 2 and 3 Emergency Plan, July, 1980". Hereinafter "Applicants EP"

- 3) "EP Responses to NRC Questions" dated January 9, 1981, December 5, 1980, and November 26, 1980.
 - 4) "State of California, Nuclear Power Plant Emergency Response Plan" as revised August 1978. Hereinafter "State Plan".
 - 5) "Orange County Response Plan, SONGS, December, 1980". Hereinafter "Orange Plan".
 - 6) "Unified San Diego County, Nuclear Power Plant Emergency Response Plan, December, 1980". Hereinafter "San Diego Plan".
 - 7) "Nuclear Power Plant Emergency Response Plan, San Onofre, San Clemente, and Doheny State Park and Beach Areas, December, 1980". Hereinafter "Parks Plan".
 - 8) "Emergency Response Plan (Marine Corps Base, Camp Pendleton, California) 1-79". Hereinafter "USMC Plan".
 - 9) "San Juan Capistrano Radiological Emergency Response Plan, SONGS, December, 1980". Hereinafter "San Juan Capistrano Plan".
 - 10) IAEP
 - 11) 10 C.F.R. §§ 5a33, 50.47, 50.54(q)(r)(s)(t) and (u);
10 C.F.R., Part 50, Appendix E; NUREG 0654/FEMA. REP.
1. Hereinafter "Federal Regulations".
 - 12) NRC Directive dated December 1980, "Effect of Earthquakes on Emergency Responses at San Onofre Nuclear Generating Stations, Units 1, 2 and 3". Hereinafter "NRC Directive".
- 1(c) Does not apply.
- 1(d) Jack Duncan, P.O. Box 1302, Lakeside, California 92040
Marian Wright, San Diego County, Office of Disaster

Preparedness.

1(e) Jack Duncan

- (i) Lack of coordination and integration of the emergency plans.
- (ii) Lack of coordination, as discussed specifically above.
- (iii) Mr. Duncan's opinions are based on his expertise in the fields of disaster planning and communications.

INTERROGATORY NO. 2:

Do you contend that the offsite emergency plans, taken together, do not adequately comply with the Federal Requirements? If so, as to each of the following plans:

- (a) State Plan;
- (b) Orange Plan;
- (c) San Diego Plan;
- (d) Parks Plan;
- (e) USMC Plan;
- (f) San Juan Capistrano Plan; and
- (g) IAEP.

(1) State each and every section and subsection of the Federal Requirements with which you contend the plan does not comply;

(2) State each and every fact upon which you base your contention;

(3) Identify each and every document or communication upon which you base your contention;

(4) Identify each and every event upon which you base your contention;

(5) Identify each and every person with knowledge of the factual basis or bases of this contention, or on whose writing,

opinions, or prior testimony you base this contention;

(6) Identify each and every person whom you expect to call as a witness, expert or otherwise, at the hearing on this contention before the ASLB and as to each witness so identified, please provide the following information:

(i) State the precise subject matter on which the witness is expected to testify;

(ii) State the substance of the facts and opinions to which the witness is expected to testify;

(iii) Summarize the factual and theoretical bases as well as any other grounds, for each opinion to which the witness is expected to testify.

ANSWERS TO INTERROGATORY NO. 2:

2. Yes.

2(a) State Plan - The State OES plan, with which applicants have coordinated their plan, was developed prior to the promulgation of the new Federal Regulations. The State is in the process of revising their plan to meet the Federal Regulations. Until this revised plan is published, it is impossible to know whether or not it will meet all the Federal Regulations.

1) Does not apply.

2) The OES Plan was published in 1975 and revised as of August 1978. The new Federal Regulations went into effect in 1980.

3) 1. State Plan

2. Federal Regulations

4) Does not apply.

- 5) 1. Don Mastretti, State OES, Sacramento, California.
2. Jim Watkins, State OES, Sacramento, California.
- 6) We have not yet determined who our witnesses will be in this subject area. We will update this response when the information becomes available.

2(b) Orange Plan

- 1) 10 C.F.R. §§ 50.33(g); 50.47(b)(3,5,7,10,14,16); 50.47(1)(2).
- 2) 10 C.F.R. § 50.33(g) and § 50.47(c)(2) - The plume exposure EPZ was not determined by an in-depth, site specific study. The Orange Plan merely adopts the EPZ radius of "about 10 miles" without regard to the particular needs of this site.

10 C.F.R. § 50.47(b)(3) - There are no letters of agreement, contracts, or other executed agreements which assure the availability of emergency assistance resources. There is no proof that such arrangements have been made or will be carried out.

10 C.F.R. § 50.47(b)(5)(6) - The communications network is inadequate because it is a) linked with the size of the EPZ; and b) not coordinated as set forth in answer 1(a)(7).

10 C.F.R. § 50.47(6)(7) - The Public Information and Education program is inadequate. The Plan merely outlines a Public Information program, but does not define any hard, specific details necessary to actually implement such a program. Furthermore, there has been no Public Information plan developed by applicants, with which the

Orange County Public Information plan must be coordinated and integrated.

10 C.F.R. § 50.47(b)(10) - The protective response plan is inadequate because.

1. The methods for monitoring drinking water and food supplies are not specifically defined.
2. There are no provisions for dealing with radioactively contaminated animals, which could be present in large amounts, including livestock, pets, and wild animals.
3. There are no specific plans regarding storage and distribution of Potassium Iodide tablets.
4. The evacuation plan is inadequate because it is closely linked to the size of the EPZ's, which were not determined by a site-specific study.
5. The evacuation time estimates do not adequately consider evacuation under the wide range of possible conditions and circumstances. (i.e. - 3 a.m., raining, earthquake or Labor Day weekend at 4:00 p.m.).

10 C.F.R. § 50.47(b)(12) - There is no specific criteria for determining the training or equipment necessary for a medical facility to properly deal with radioactively contaminated or injured persons.

10 C.F.R. § 50.47(b)(13) - The recovery and re-entry plan is merely an outline, virtually restating the Federal Requirements. No criteria have been established.

10 C.F.R. § 50.47(b)(14) - The exercises and drills plan is mere restatement of the Federal Requirements. No

specific descriptions or criteria have been established.

In the present form, this plan could not be implemented.

10 C.F.R. § 50.47(b)(15) - No one has been designated to coordinate the Orange County radiological emergency response training program.

10 C.F.R. § 50.47(a)(2) - The Orange County plan is not capable of implementation as set forth above.

- 3)
 1. Orange County Plan;
 2. Federal Regulations
 3. SAI Report
 4. IAEP
- 4) Does not apply.
- 5)
 1. Jack Duncan, P.O. Box 1302, Lakeside, California, 92040
 2. John Kearns, State O.E.S., Sacramento, California, Statement before the President's Nuclear Safety Oversight Committee, Washington, D.C., August 18, 1980.
 3. Robert Lacy, San Diego County O.D.P., testimony at _____ Hearing of October 7, 1976.
 4. Jim Watkins, State O.E.S., Sacramento, California.
- 6) We have not yet determined who our witnesses will be in this subject area. We will update this response when the information becomes available.
 1. 10 C.F.R. §§ 50.33(g); 50.47(a)(2); 50.47(b)(1,3,5, 6,7,8,10,12,13,14,15); 10 C.F.R. § 50.47(c)(2).
 2. 10 C.F.R. §§ 50.33(g) & 50.47(c)(2) - The plume exposure EPZ was not determined by an in-depth, site specific study. The San Diego Plan merely adopts an EPZ radius

of "about 10 miles without regard to the particular needs of this site.

10 C.F.R. § 50.47(b)(1) - The San Diego O.D.P. is not adequately staffed to handle a prolonged emergency situation. Furthermore, the O.D.P. is not manned 24 hours, yet it is the primary response organization for a very large population.

10 C.F.R. § 50.47(b)(3) - There are no letters of agreement, contracts, or other executed agreements to assure the availability of emergency assistance resources. There is no proof that these arrangements have been made and will be carried out.

10 C.F.R. § 50.47(b)(5)(6) - The communications and notification network is inadequate because:

- 1) it's linked to the EPZ, which is inadequate;
- 2) the O.D.P. is not manned outside of the normal working hours;
- 3) An answering service is inadequate in a situation which could require a 30-minute response. Every minute lost is a potential threat to the public health and safety;
- 4) not coordinated as set forth in answer (1)(a)(7).

10 C.F.R. § 50.47(b)(7) - The Public Information and Education plan is merely an outline rather than a detailed, specific plan. The plan is incapable of being implemented. Furthermore, there has been no Public Information and Education plan developed by

applicants, with which the San Diego Plan must be coordinated and integrated.

10 C.F.R. § 50.47(b)(8) - The site of the county Emergency Operations Center is unknown.

10 C.F.R. § 50.47(b)(10) - The protective response plan is inadequate because:

- 1) The methods for monitoring drinking water and food supplies are not specifically defined.
- 2) There are no provisions for dealing with radioactively contaminated animals.
- 3) There are no specific plans regarding storage and distribution of potassium iodide tablets.
- 4) The evacuation plan is inadequate because it is closely linked to the EPZ, which has not been determined on a site-specific basis.
- 5) The evacuation time estimates do not give adequate consideration to the wide range of possible conditions and circumstances under which the evacuation may occur.
- 6) Other countermeasures are briefly mentioned, but without any specifics or details.

10 C.F.R. § 50.47(b)(12) - There is no proof that arrangements have been made with medical facilities. Furthermore, there is no criteria for determining the training or equipment necessary for a medical facility to properly deal with radioactively contaminated or injured persons.

10 C.F.R. § 50.47(b)(13) - The recovery and reentry plan merely restates the Federal Requirements.

No criteria have been established.

10 C.F.R. § 50.47(b)(14) - The exercises and drills plan merely restates the Federal Requirements. No specific or detailed plans have been developed. This plan could not be implemented.

10 C.F.R. § 50.47(b)(15) - No one has been designated to coordinate the training program. Furthermore, the plan provides no specifics or details.

10 C.F.R. § 50.47(a)(2) - The San Diego Plan is not capable of implementation, for all of the above reasons.

3. 1) San Diego County Plan;

2) Federal Regulations;

3) SAI Report;

4) IAEP.

4. Does not apply.

5. 1) Jack Duncan, P.O. Box 1302, Lakeside, CA 92040

2) John Kearns, State O.E.S., Sacramento, CA

3) Robert Lacy, San Diego County O.D.P.

4) Jim Watkins, State O.E.S., Sacramento, CA

6. We have not yet determined who our witnesses will be as to this subject area. We will update this response as the information becomes available.

2(d)(1) 10 C.F.R. § 50.47(a)(2); 10 C.F.R. §§ 50.47(b)(1,3,7,13, 14,15)

(2) 10 C.F.R. § 50.47(a)(2) - The State Parks Plan is not capable

of implementation for the reasons set forth below.

10 C.F.R. § 50.47(b)(1) - The State Park Dept. is not adequately staffed to handle emergency situations occurring at peak summer hours. Furthermore, the State Park Dept. is not adequately staffed or trained to monitor radiological contamination.

10 C.F.R. § 50.47(b)(3) - There are no letters of agreement, contracts, or other executed agreements to assure the availability of emergency assistance equipment and resources. There is no proof that these arrangements have been made and will be carried out.

10 C.F.R. § 50.47(b)(7) - The Public Information and Education plan is inadequate because it does not give detailed, specific plans for dissemination of information to the transient population. Furthermore, there is no Public Information and Education plan developed by applicants, with which the State Park plan must be integrated and coordinated.

10 C.F.R. § 50.47(b)(13) - No criteria has been developed for the recovery and reentry plan. The plan merely restates the Federal Requirements.

10 C.F.R. § 50.47(b)(10) - The Protective Response is inadequate. The Evacuation estimates do not adequately consider evacuation under the wide range of possible conditions or circumstances (i.e. - 3 a.m., raining or Labor Day weekend, 4:00 p.m.)

10 C.F.R. § 50.47(b)(14) - No specific, detailed plans have been developed for the exercise and drill program.

The plan could not be implemented.

10 C.F.R. § 50.47(b)(15) - No one has been designated to coordinate the emergency response training program.

Furthermore, no specific detailed plans have been developed for the training program.

3.
 - 1) State Parks Plan
 - 2) Federal Regulations
 4. Does not apply.
 5.
 - 1) Paul Muspratt, California Dept. of Parks and Recreation,
Testimony at the hearing of October 7, 1976.
 - 2) Jack Duncan, P.O. Box 1302, Lakeside, CA 92040.
 6. We have not yet determined who our witnesses will be in this subject area. We will update this response as the information becomes available.
- 2(e)(1) USMC Plan - The Camp Pendleton plan satisfies the Federal Requirements. However, Camp Pendleton's involvement in the communications network renders this plan incapable of implementation because the communications network is unworkable.
- (2) See answer (1)(a)(7).
 - (3)
 1. USMC Plan
 2. IAEP
 - (4) Does not apply.
 - (5) Jack Duncan, P.O. Box 1302, Lakeside, CA 92040.
 - (6) Jack Duncan
 - (i) Inadequacy of Communications Network.
 - (ii) Specifically, the communications network described in

Attachment 12 of the IAEP's is not understandable and unworkable.

(iii) Mr. Duncan's opinion is based on his expertise in the field of disaster planning and communications.

2(f)

- 1) 10 C.F.R. § 50.47(a)(2); § 50.47(b)(1,3,5,6,7,10,12,13,14,15)
- 2) 10 C.F.R. § 50.47(a)(2) - The entire San Juan Capistrano Plan is merely an outlien of an emergency response plan. The plan is a glossary of emergency planning terms. The San Juan Capistrano is incapable of implementation for this reason and for reasons set forth below.

10 C.F.R. § 50.47(b)(1) - Staffing for a prolonged emergency situation is inadequate.

10 C.F.R. § 50.47(b)(3) - There are no letters of agreement, contracts, or other executed agreements to assure the availability of emergency assistance resources.

10 C.F.R. § 50.47(b)(5)(6) - The notification and communication system is inadequate, because the system is not coordinated and integrated for reasons set forth in (1)(a)(7).

10 C.F.R. § 50.47(b)(7) - The Public Information and Education plan is merely an outline, rather than a detailed, specific plan. The plan is incapable of implementation. Furthermore, there has been no Public Information and Education plan developed by applicants, with which the San Juan Capistrano Plan must be coordinated and integrated.

10 C.F.R. § 50.47(b)(10) - The protective response plan is inadequate for the following reasons:

1) The evacuation time estimates do not give adequate consideration to the wide range of possible conditions and circumstances under which the evacuation may occur.

2) Other countermeasures are briefly outlined, but without any specific, detailed plans.

10 C.F.R. § 50.47(b) (12) - There is no proof that arrangements have been made with medical facilities. Furthermore, there is no criteria for determining the training or equipment necessary for a medical facility to properly deal with radioactively contaminated or injured persons.

10 C.F.R. § 50.47(b) (13) - The recovery and reentry plan merely restates the Federal Requirements. No criteria have been established.

10 C.F.R. § 50.47(b) (14) - The exercises and drills plan merely restates the Federal Requirements. No specific or detailed plans have been developed. This plan could not be implemented.

10 C.F.R. § 50.47(b) (15) - No one has been designated to coordinate the training program. Furthermore, the plan provides no specifics or details.

3. 1) San Juan Capistrano Plan;

2) Federal Regulations

3) IAEP

4. Does not apply.

5. Jack Duncan, P.O. Box 1302, Lakeside, CA 92040

6. We have not yet determined who our witnesses will be on this subject area. We will update this response as the information becomes available.

2(g) IAEP

- 1) 10 C.F.R. § 50.33(g); 10 C.F.R. §§ 50.47(a)(2); (b)(1,3,5,6,7,10,13,14,15)
- 2) 10 C.F.R. § 50.33(g) and § 50.47(c)(2) - The IAEP is inadequate because it is based on plume exposure EPZ radius of "about 10 miles". The size of the EPZ was not determined by a site-specific study.

10 C.F.R. § 50.47(a)(2) - The IAEP is incapable of implementation for the reasons set forth below.

10 C.F.R. § 50.47(b)(1) - The principal response organizations are not adequately staffed to handle a continual emergency situation. Furthermore, the State O.E.S. is not a party to the IAEP.

10 C.F.R. § 50.47(b)(3) - There are no letters of agreements, contracts, or other executed agreements to assure the availability of emergency assistance resources and equipment.

10 C.F.R. § 50.47(b)(5&6) - Attachment 12 of the IAEP (the communications net) is confusing and incapable of implementation. Furthermore, it is linked to the size of the EPZ, which is inadequate because it is not based on a site-specific study.

10 C.F.R. § 50.47(b)(7) - The Public Information and Education program is incapable of implementation because there are no specific detailed plans developed. Furthermore, the applicants have not developed a Public Information and Education plan with which to coordinate and integrate the off-site agencies plans.

10 C.F.R. § 50.47(b)(8) - No provisions have been made for

political representatives to be present at the emergency operations center.

10 C.F.R. § 50.47(b)(10) - The protective response plan is inadequate for the following reasons:

- 1) The methods for radiological monitoring of drinking water and food supplies are not specifically defined.
- 2) There are no specific plans regarding storage and distribution of potassium iodide tablets.
- 3) The evacuation plan is inadequate because it is linked to the size of the EPZ.
- 4) The evacuation time estimates do not give adequate consideration to the wide range of possible conditions and circumstances under which the evacuation may occur.
- 5) There are no specific plans regarding storage and distribution of protective clothing and equipment for emergency response workers.

10 C.F.R. § 50.47(b)(13) - The recovery and reentry plan does not establish any specific criteria for reentry. The plan is incapable of implementation.

10 C.F.R. § 50.47(b)(14) - No detailed, specific plans have been developed for coordinated and integrated exercises and drills. This plan could not be implemented.

10 C.F.R. § 50.47(b)(15) - There is no coordinated emergency response training program. No one has been designated to coordinate the training program.

- 3) 1. IAEP;
2. Federal Regulations

- 4) Does not apply.
- 5) Jack Duncan, P.O. Box 1302, Lakeside, CA 92040
- 6) We have not yet determined who our witnesses will be on this subject area. We will update our response as the information becomes available.

INTERROGATORY NO. 3:

Have you analyzed or do you intend to analyze any of the following plans:

- (a) EP;
- (b) State Plan;
- (c) Orange Plan;
- (d) San Diego Plan;
- (e) Parks Plan;
- (f) USMC Plan;
- (g) San Juan Capistrano Plan; or
- (h) IAEP?

ANSWER TO INTERROGATORY NO 3:

"Analyzed" - no.

INTERROGATORY NO. 4:

Do you contend that the EP, as clarified by the EP Responses to NRC questions, does not comply with Federal Requirements? If so,

(a) State each and every section and subsection of the Federal Requirements with which you contend the EP does not comply;

(b) State each and every fact upon which you base your contention;

(c) Identify each and every document or communication upon which you base your contention;

(d) Identify each and every event upon which you base your contention;

(e) Identify each and every person with knowledge of the factual basis or bases of this contention, or on whose writing, opinions, or prior testimony you base this contention;

(f) Identify each and every person whom you expect to call as a witness, expert or otherwise, at the hearing on this contention before the ASLB and as to each witness so identified, please provide the following information;

(i) State the precise subject matter on which the witness is expected to testify;

(ii) State the substance of the facts and opinions to which the witness is expected to testify;

(iii) Summarize the factual and theoretical bases as well as any other grounds, for each opinion to which the witness is expected to testify.

ANSWERS TO INTERROGATORY NO. 4:

Yes, the Applicants' EP does not comply with the Federal Requirements.

(a) 10 C.F.R. § 50.33(g)(2); 10 C.F.R. §§ 50.47(a)(2), 50.47(b)(1,2,3,5,6,7,8,9,10,12-16); 50.47(c)(2).

(b) 10 C.F.R. §§ 50.33(g)(2) & 50.47(c)(2) - The plume exposure EPZ must be determined on a site specific basis. Applicants plan merely adopts an EPZ radius of "about 10 miles" without regard to the particular needs of this site.

10 C.F.R. § 50.47(a)(2) - The applicants plan, as it stands

now, is not capable of implementation for reasons set forth below.

10 C.F.R. § 50.47(b)(1) - Off-site staffing is inadequate to handle emergency conditions for a prolonged, continuous period.

10 C.F.R. § 50.47(b)(2) - Applicants have not provided information on their capability to augment on-site staffing during an emergency.

10 C.F.R. § 50.47(b)(3) - There is no proof that arrangements have been made to assure the availability of emergency assistance resources, such as bulldozers, helicopters, etc.

10 C.F.R. § 50.47(b)(5,6) - The communications and notification network is inadequate because:

- 1) it's linked to the EPZ, which is inadequate;
- 2) not coordinated as set forth in answer (1)(a)(7).

10 C.F.R. § 50.47(b)(7) - Applicants have not provided a detailed Public Information and Education plan.

10 C.F.R. § 50.47(b)(8) - The Primary Emergency Operations Center at San Clemente City Hall is not adequate to handle the large number of media persons covering an emergency at San Onofre.

The meteorology program on-site does not meet the specific requirements of Appendix 2 of NUREG 0654.

10 C.F.R. § 50.47(b)(9) - The off-site radiological monitoring plan is not adequate because there are no specific methods or criteria established to be followed in the off-site monitoring.

10 C.F.R. § 50.47(b)(10) - The protective response plan is inadequate for the following reasons:

- 1) The evacuation plan is closely linked to the EPZ, which is inadequate because it was not determined on a site-specific basis;
- 2) The evacuation time estimates do not realistically consider all the possible conditions and circumstances.
- 3) There are no specific plans for storage and distribution of potassium iodide tablets.

10 C.F.R. § 50.47(b)(12) - No specific criteria has been developed to determine the adequacy of the training and equipment necessary for a medical facility to handle radioactively contaminated or injured persons.

10 C.F.R. § 50.47(b)(13) - The recovery and reentry plan is merely a restatement of the Federal Requirements. No specific criteria has been established.

10 C.F.R. § 50.47(b)(14) - The exercises and drills plan merely restates the Federal Requirements. No specific, detailed plans have been developed. The plan is not capable of being implemented.

10 C.F.R. § 50.47(b)(15) - The emergency response training program is not adequately coordinated with the off-site assistance agencies. Furthermore, no one is designated to coordinate emergency response training.

10 C.F.R. § 50.47(b)(16) - The applicants' EP calls for an independent review every two years. NUREG 0654 calls for an independent review annually. Considering the growth

and turnover rate in Southern California, a review every two years is completely inadequate.

- (c) 1. Applicants' Plan;
- 2. EP Responses to NRC Questions dated November 26, 1980, December 5, 1980, and January 9, 1981.
- 3. IAEP;
- 4. Federal Regulations.
- (d) Does not apply.
- (e) Jack Duncan, P.O. Box 1302, Lakeside, CA 92040
- (f) We have not yet determined who our witnesses will be on this subject area. We will update this response as the information becomes available.

INTERROGATORY NO. 5:

Aside from the contentions already referred to in the foregoing Interrogatories, do you contend that there are any other reasons for finding that the state of onsite and offsite emergency preparedness for SONGS 2 and 3 does not provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency involving SONGS 2 and 3? If so, state each such contention in recordable detail, and as to each such contention so stated:

- (a) State each and every fact upon which you base your contention;
- (b) Identify each and every document or communication upon which you base your contention;
- (c) Identify each and every event upon which you base your contention;

(d) Identify each and every person with knowledge of the factual basis or bases of this contention, or on whose writing, opinions, or prior testimony you base this contention;

(e) Identify each and every person whom you expect to call as a witness, expert or otherwise, at any hearing on this contention that may be held before the ASLB and as to each witness so identified, please provide the following information;

(i) State the precise subject matter on which the witness is expected to testify;

(ii) State the substance of the facts and opinions to which the witness is expected to testify;

(iii) Summarize the factual and theoretical bases as well as any other grounds, for each opinion to which the witness is expected to testify.

(f) Specify each and every reason you believe there is "good cause" under 10 C.F.R. § 2.714(a)(1) to excuse your failure to raise this contention in this proceeding at an earlier date.

ANSWERS TO INTERROGATORY NO. 5:

The following are the other reasons why Intervenors believe the emergency plans are not adequate:

1) Applicants EP, and the emergency plans of the off-site assistance agencies, must consider the impact of a major earthquake upon their emergency response plans.

a) Recent studies have discovered new off-shore faults in the SONGS area. The likelihood of an earthquake exceeding the SONGS Safe Shutdown Earthquake level is now much greater.

- b)
 - 1. NRC Directive, Dated Dec. 4, 1980.
 - 2. Greene and Kennedy study of off-shore faulting.
 - 3. FEMA report (U.S.G.S. 81-115 dated Jan. 1981).
 - c) Does not apply.
 - d)
 - 1. Robert L. Tedesco, Assistant Director for Licensing, Division of Licensing, Nuclear Regulatory Commission.
 - 2. Michael Kennedy
 - 3. Gary Greene
 - e) We have not determined who our witnesses will be on this subject. When this information becomes available, we will update this response.
 - f) This contention is raised with "good cause" because these important facts have just recently been discovered. We have raised this contention as soon as possible. Furthermore, the NRC itself raised this issue in its letter to Applicants in December, 1980. The "earthquake issue" is critical to the public health and safety and deserves serious consideration by all parties involved in this proceeding.
- 2) In the event of a major earthquake, damage may occur to more than one reactor. Applicants EP must consider the impact of a "simultaneous release" as defined in 10 C.F.R. § 100.11, upon their emergency response plans.
- a) See (5)(1)(a).
 - b)
 - 1. Greene and Kennedy Study of Off-shore faulting;
 - 2. FEMA report (U.S.G.S. 81-115, dated January 1981).
 - c) does not apply.

- d) 1. Michael Kennedy
 - 2. Gary Greene
 - e) See (5)(1)(e).
 - f) See (5)(1)(f).
- 3) Due to the particular aspects of SONGS location, such as the high earthquake potential and the high population in nearby areas, it is impossible to plan for the worst possible accident. Such an accident would possibly involve evacuation of 10 million people for up to 10 years. Such a disaster is beyond the scope of planning, according to the O.E.S.. However, such a disaster could be triggered by an earthquake exceeding the plants SSE; an event that is a real possibility; not a bizarre impossible event. Therefore, no emergency plan can ever be adequate to fully protect the health and safety of the millions of people living in or near Southern California.
- a) See (5)(1)(a).
 - b) 1. Greene & Kennedy Study of Off-shore faulting;
 - 2. FEMA report (U.S.G.S. 81-115, January, 1981).
 - c) does not apply.
 - d) Jim Watkins, State O.E.S., Sacramento, California.
 - e) See (5)(1)(e).
 - f) See (5)(1)(f).

INTERROGATORY NO. 6:

Do you contend that a full scale exercise which tests as much of the EP and the off-site emergency plans as is reasonably achievable without mandatory public participation is mandated by the

Federal Requirements? If so,

(a) Describe in reasonable detail what you believe to be an adequate exercise scenario to meet Federal Requirements;

(b) Identify all Federal, State and local governmental off-site assistance agencies, as well as private entities, you believe should be involved in the exercise to meet Federal Requirements;

(c) Describe in reasonable detail what you believe to be adequate criteria against which to evaluate the exercise for purposes of compliance with Federal Requirements.

ANSWERS TO INTERROGATORY NO. 6:

Yes.

(a) Adequate scenarios to test the various plans and their compatibility must include the actual manning of all of the several command posts (by whatever name) by all of the key players, including the topmost decision makers, outlined in the plans. An unannounced drill at an inconvenient time, according to a tight time frame, should be one of the early drills. This is to emphasize the importance of the plan to the jurisdiction. One of the most common occurrences in disaster planning is that the top decision makers try to delegate during drills, rather than face the inconvenience of attending. During the real thing, they then show up and make decisions without benefit of a "rehearsal".

The earliest scenario, too, must be "worst case" so that follow-on drills can cope with details of lesser incidents.

The earliest scenario, then should involve decisions

requiring extensive evacuation during a stormy period of intermittent rain to provide for fast deposition of radioactive contaminants. Time, therefore, is perhaps so compressed that decisions may be made too late, due to activation and alerting delays.

- (b) Federal Agencies: National Weather Service, U.S. Coast Guard, NRC, U.S. Marine Corps, U.S. Border Patrol, FEMA, and EPA.

State agencies: State Dept. of Parks and Recreation, O.E.S., CHP, Health, Agriculture, Fish and Game, National Guard.

Local: Counties of San Diego and Orange, cities of Oceanside, San Clemente, San Juan Capistrano, Santa Ana, Huntington Beach, Laguna Beach, and any others acting or named as host areas, plus radiation monitors, and schools.

Private agencies: Red Cross, Salvation Army, laboratories, etc., plus communications units such as REACT, RACES, and ARES, utilities and PacTel; press, and hospitals. While not involving the general public, "public players" should be selected to actually travel from their "homes" in the PEZ or evacuated area to host facilities to test time and registration accuracy. While a pre-exercise rehearsal can spell out the players and the scenario, the time should be, as stated, unannounced and inconvenient -- as called for in Federal Requirements.

- (c) Criteria for judging must be established ahead of time by professional civil defense personnel, health radiation specialists, Red Cross, Salvation Army, traffic engineers,

etc. from out-of-the-area and on hand during the drill as umpires. This is best likened to a military war games exercise. Time, of course, is not the only criteria although important. The need to evacuate, the method of communications, and the correlation of the planning should be determined. This type of test will show the folly of the program of no one in charge! It will also show communications cannot be established by drawing a chart.

INTERROGATORY NO. 7:

Have you discussed any of the following plans with representatives of the off-site assistance agencies:

- (a) EP;
- (b) State Plan;
- (c) Orange Plan;
- (d) San Diego Plan;
- (e) Parks Plan;
- (f) USMC Plan; and
- (g) San Juan Capistrano Plan.

If so, as to each of the plans specified above,

(1) Identify the person or persons with whom you discussed the plan and the approximate date of each such discussion; and

(2) Identify all documents or communications pertaining to your discussion of the plan with each person identified in subparagraph (1) immediately above.

ANSWERS TO INTERROGATORY NO. 7:

No.

INTERROGATORY NO. 8:

Have any of your prior emergency planning responses contained in your prior answers to interrogatories propounded by Applicants become incorrect or incomplete in any material respect? If so, as to each such prior response, provide all such supplementary information, not already provided in answer to the foregoing interrogatories as is required by 10 C.F.R. 2.740(e) or by ASLB order in this proceeding, dated August 27, 1980.

ANSWER TO INTERROGATORY NO. 8:

We will update all of our responses shortly.

Respectfully submitted,

RICHARD J. WHARTON (w)
RICHARD J. WHARTON
Attorney for Intervenors
F.O.E. ET AL.

VERIFICATION

RICHARD J. WHARTON, declares

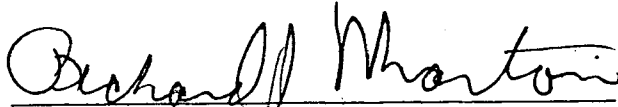
1. That he is Counsel for Intervenor, F.O.E. ET AL. in this proceeding.

2. That he is authorized by Intervenor to execute and verify the foregoing "ANSWERS TO FOURTH SET OF INTERROGATORIES PROPOUNDED BY SOUTHERN CALIFORNIA EDISON".

3. That he is informed and believes and upon such information and belief affirms that the foregoing "ANSWERS TO FOURTH SET OF INTERROGATORIES PROPOUNDED BY SOUTHERN CALIFORNIA EDISON" is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed April 8, 1981 in San Diego, California.


RICHARD J. WHARTON, Attorney
for Intervenor,
F.O.E. ET AL.

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of April 1981, a copy of the foregoing INTERVENOR, FOE ET AL. ANSWERS TO FOURTH SET OF INTERROGATORIES PROPOUNDED BY SOUTHERN CALIFORNIA EDISON, Attorney, RICHARD J. WHARTON, was served upon each of the following by depositing in the United States mail, first-class, postage pre-paid, addressed as follows:

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Dr. Elizabeth Johnson
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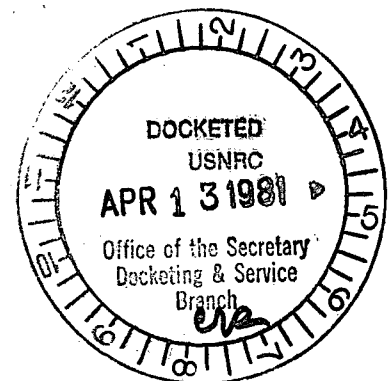
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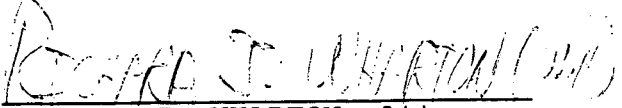
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
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DATED: April 3, 1981


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