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 RECIP. NAME: RECIPIENT AFFILIATION: Atomic Safety and Licensing Board Panel

SUBJECT: Revised contentions submitted by intervenor Friends of the Earth, et al, per 810429 prehearing conference.

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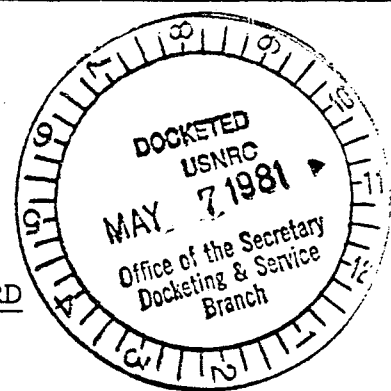
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
SOUTHERN CALIFORNIA EDISON COMPANY,) Docket Nos. 50-361 OL
ET AL.) 362 OL
)
(San Onofre Nuclear Generating Station)
Units 2 and 3))

REVISED CONTENTIONS SUBMITTED
BY INTERVENORS FOE ET AL.

At the Prehearing conference held on April 29, 1981, the Atomic Safety and Licensing Board indicated to Intervenors FOE et al. that they would give positive consideration to revised contentions regarding inadequate review and lack of Required Investigations if such contentions were alleged with more specificity. The following is submitted in response to that request with the hope that the Board will look into the adequacy of geologic/seismic investigations in the course of the hearings to determine if the public health and safety has been assured to the maximum extent possible.

CONTENTION

Whether the NRC Staff has required and the Applicants have conducted the investigations required by 10 C.F.R., Part 100, Appendix A, Sections II, III(j), IV(a) and (b), V(b) and VI(b) and whether the Applicants and the NRC Staff can provide reasonable assurance that SONGS 2 and 3 can be operated without undue risk to the public health and safety in that:

(a) Applicants have failed to conduct the investigations required

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to determine the structural and tectonic relationships between the Cristianitos Fault and the Cristianitos Zone of Deformation and the O.Z.D. in that such structural relationships were not officially mapped until September 1980, and were summarily discussed in the NRC SER of December 1980 and that no further investigations of the relationships or the significance of the same have been performed since that time and that the critical areas close to and under the plant are still listed as "Data Voids" on the last survey performed. Thus the investigations required to determine the S.S.E., the maximum vibratory ground motions that can be postulated and the potential for surface faulting have not been performed in accordance with the applicable regulations.

(b) The Applicants have not conducted the "detailed investigations to determine the need to design for surface faulting" as required by 10 C.F.R., Part 100, Appendix A, Section j in that the latest and most definitive maps of geologic structures in the immediate area of SONGS 2 and 3 indicate "Data Voids" in the area of the offshore and onshore projection of the Cristianitos Zone of Deformation and that such data is necessary to determine the need to design for surface faulting.

(c) Applicants have not performed the required investigations to determine whether the O.Z.D. extends south of the Rose Canyon Fault Zone and forms a structural relationship with the Agua Blanco fault zone in that there is a data void in the area where such a structural relationship has been postulated.

(d) The Applicants have not conducted the required investigations to determine the control width of the "Cristianitos Zone of Deformation" as required by 10 C.F.R., Part 100, Appendix A, Section III(k).

in that the C.Z.D. was not mapped until September of 1980 and no investigations to determine the control width of the entire length of the C.Z.D. have been performed to date.

(e) The Applicants have not performed the investigations required to determine the close to shore and onshore projection of the C.Z.D.

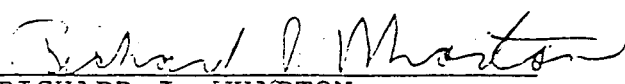
(f) The Applicants have not conducted the required detailed faulting investigations regarding the structural and tectonic relationships between the Cristianitos Fault Zone, the A.B.C.D. features, the C.Z.D. and the O.Z.D. and the areas between the mapped zones of these tectonic structures to clearly justify that surface faulting on any of these zones need not be taken into account in establishing the S.S.E. and the maximum vibratory ground motions and have not complied with 10 C.F.R., Part 100, Appendix A, Section IV(b), V(b) and VI(b).

(g) The NRC has failed to require and the Applicant has failed to perform the investigations required to fully determine the relationship of the O.Z.D. to the newly discovered regional tectonic structure known as the Cristianitos Zone of Deformation as specifically required by 10 C.F.R., Part 100, Appendix A, Section IV(b), &(ii) and that the full extent of that structural relationship is essential in determining whether and to what extent the nuclear power plant need be designed for surface faulting.

(h) Applicants have failed to perform the required investigations to determine whether the Cristianitos fault meets the definition of "capable fault as set for in 10 C.F.R., Part 100, Appendix A, Section III, (9) 1, 2 and 3.

Dated: May 5, 1981

Respectfully Submitted,


RICHARD J. WHARTON
Attorney for Intervenor
FOE ET AL.

CERTIFICATION OF SERVICE

I hereby certify that on the 5th day of May, 1981, a copy of the foregoing REVISED CONTENTIONS SUBMITTED BY INTERVENORS FOE ET AL., Attorney RICHARD J. WHARTON, was served upon each of the following by depositing in the United States mail, first-class, postage prepaid, addressed as follows:

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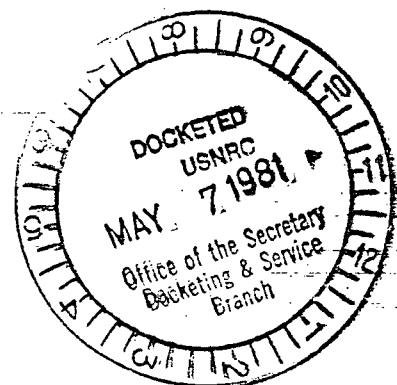
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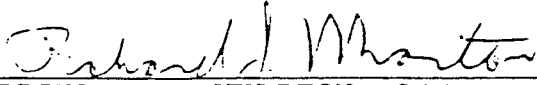
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