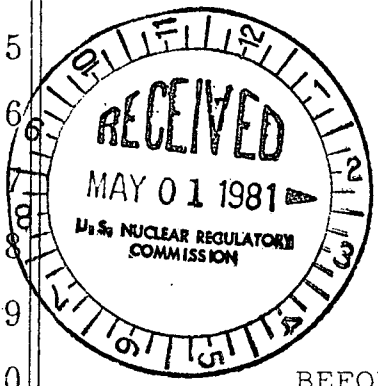
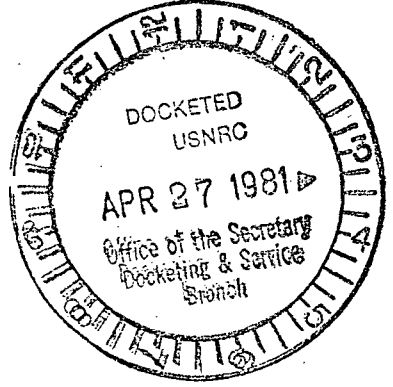


RELATED CORRESPONDENCE

4/17/81

1 PHYLLIS M. GALLAGHER
1695 West Crescent Avenue
2 Suite 222
Anaheim, Ca. 92801
3 Telephone: (714) 776-3834
4 Attorney for Intervenor GUARD



UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | | |
|----|---------------------------------|---|----------------------------|
| 12 | In the Matter of |) | Docket Nos. 50-361 OL |
| 13 | SOUTHERN CALIFORNIA |) | 50-362 OL |
| 14 | EDISON COMPANY, <u>et al.</u> , |) | |
| 15 | (San Onofre Generating Station, |) | PROPOSED AGENDA ITEMS |
| 16 | Units 2 and 3). |) | FOR SPECIAL PRE-HEARING |
| | |) | CONFERENCE, April 29, 1981 |

17 TO THE ATOMIC SAFETY AND LICENSING BOARD AND TO ALL PARTIES:

18 Intervenor GUARD proposes the following matters for
19 consideration at the Special Pre-hearing Conference to be held
20 in San Diego on Wednesday, April 29, 1981 at 9:00 a.m. pursuant
21 to 10 CFR 2.751a regarding Emergency Planning:

- 22 1. Discussion of further discovery, including but
- 23 not limited to discovery on the drills and testing of the plans.
- 24 2. Discussion of the Proposed Rule change for
- 25 expediting licensing proceedings, and its impact on the licensing
- 26 hearings, if adopted.
- 27 3. The refinement of GUARD'S Contentions. GUARD

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1 proposes the following language:

2 Contention 1. Applicants have not complied with 10 C.F.R.
3 Part 50 Appendix E and 10 C.F.R. § 50.47
4 regarding emergency plans because there is no
5 reasonable assurance that the plans can be
6 implemented, since they fail to meet the
7 required standards for staffing response
8 organizations, notification of response
9 organizations and the public, communications
10 among response organizations and between
11 response organizations and the public, and
12 dissemination of information to the public,
13 all of which are necessary to provide reason-
14 able assurance that adequate protective
15 measures can and will be taken in the event
16 of a radiological emergency.

17 Contention 2. Applicants have not complied with 10 C.F.R.
18 Part 50 Appendix E and 10 C.F.R. § 50.47
19 regarding emergency plans since the plans fail
20 to adequately address the problems of
21 providing and maintaining adequate emergency
22 facilities and equipment, developing a range
23 of protective actions for the plume exposure
24 pathway EPZ including measures to be taken
25 in an accident complicated by an earthquake,
26 arranging adequate medical services for
27 injured contaminated individuals, and timely
28 evacuation of various populations from the EPZ.

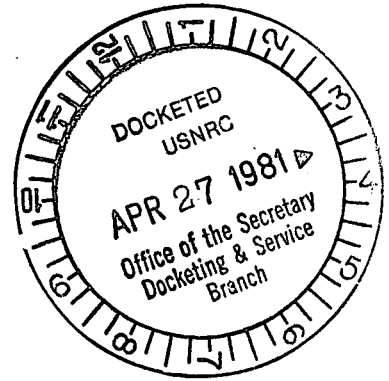
Respectfully submitted,

Dated April 17, 1981

Phyllis M. Gallagher

PHYLLIS M. GALLAGHER, Attorney
for GUARD

1 CHARLES E. McCLUNG, JR.
Attorney at Law
2 23521 Paseo de Valencia
Suite 308
3 Laguna Hills, California 92653
Telephone: (714) 768-3601



4
5 Attorney for Intervenor GUARD

6
7
8 UNITED STATES OF AMERICA
9 NUCLEAR REGULATORY COMMISSION
10 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

11
12 In the Matter of) Docket Nos. 50-361 OL
13 SOUTHERN CALIFORNIA EDISON) 50-362 OL
14 COMPANY, et. al.,) NOTICE OF APPEARANCE
15 (San Onofre Nuclear Generating)
16 Station, Units 2 and 3))

17 PLEASE TAKE NOTICE that I, Charles E. McClung, Jr., will
18 appear on behalf of GUARD, c/o Lynn Harris Hicks, 3908 Calle
19 Ariana, San Clemente, California 92672, in the above-entitled
20 matter.

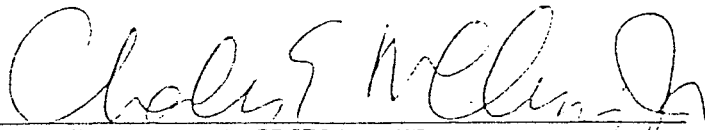
21 I am admitted to practice by the Supreme Court of California
22 and my address and telephone number are as follows:

23 23521 Paseo de Valencia, Suite 308

24 Laguna Hills, California 92653

25 Telephone: (714) 768-3601

26
27 Dated: April 16, 1981

28 
CHARLES E. McCLUNG, JR.
Attorney for Intervenor, GUARD

RELATED CORRESPONDENCE

DOCKETED
USNRC
APR 27 1981
Office of the Secretary
Docketing & Service Branch

CERTIFICATE OF SERVICE

1 I hereby certify that on the 17th day of April, 1981,
2 copies of the foregoing NOTICE OF APPEARANCE of Charles E. McClung
3 Jr., Attorney for GUARD, and of GUARD's PROPOSED AGENDA ITEMS FOR
4 SPECIAL PRE-HEARING CONFERENCE, April 29, 1981 were served upon
5 each of the following by depositing in the United States mail,
6 first class postage prepaid, at Anaheim, California, addressed
7 as follows:

- | | | |
|----|---|------------------------------------|
| 8 | James Kelly, Esq., Chairman | Dr. Cadet H. Hand, Member |
| 9 | Atomic Safety and Licensing Board | Atomic Safety and Licensing Board |
| 10 | U.S. Nuclear Regulatory Commission | Director, Bodega Marine Laboratory |
| | Washington, D.C. 20555 | University of California |
| | | P.O. Box 247 |
| 11 | Richard J. Wharton, Esq. | Bodega Bay, CA 94923 |
| | University of San Diego | |
| 12 | School of Law | Alan R. Watts, Esq. |
| | Alcala Park | Rourke & Woodruff |
| 13 | San Diego, CA 92110 | California First National Bank |
| | | Building Suite 1020 |
| 14 | David R. Piggot, Esq. | 1055 North Main St. |
| | Chickering & Gregory | Santa Ana, CA 92701 |
| 15 | Counsel for San Diego Gas & Electric Co., | |
| | and Southern California Edison Company | John R. Bury, General Counsel |
| 16 | Three Embarcadero Center, 23rd Floor | Charles R. Kocher, Esq. |
| | San Francisco, CA 92112 | James A. Beoletto, Esq. |
| 17 | | Southern California Edison Co. |
| | Docketing and Service Section | P.O. Box 800 |
| 18 | Office of the Secretary | 2244 Walnut Grove Ave. |
| | U.S. Nuclear Regulatory Commission | Rosemead, CA 92770 |
| 19 | Washington, D.C. 20555 | |
| | | James H. Drake, Vice President |
| 20 | Atomic Safety and Licensing Board Panel | Southern California Edison |
| | U.S. Nuclear Regulatory Co-mission | P.O. Box 800 |
| 21 | Washington, D.C. 20555 | 2244 Walnut Grove Avenue |
| | | Rosemead, CA 92770 |
| 22 | Mr. Lloyd von Haden | |
| | 2089 Foothill Drive | David W. Gilman |
| 23 | Vista, CA 92803 | Robert G. Lacy |
| | | San Diego Gas & Electric Company |
| 24 | Mrs. Lyn Harris Hicks | P.O. Box 1831 |
| | GUARD | San Diego, CA 92112 |
| 25 | 3908 Calle Ariana | |
| | San Clemente, CA 92672 | Lawrence J. Chandler, Esq. |
| 26 | | Office of the Executive Legal |
| | Dr. Elizabeth Johnson | Director, U.S. Nuclear Regulatory |
| 27 | Atomic Safety and Licensing Board Panel | Commission |
| | U.S. Nuclear Regulatory Commission | Washington, D.C. 20555 |
| 28 | Washington, D.C. 20555 | |

1 Janice E. Kerr, Esq.
J. Calvin Simpson, Esq.
2 Lawrence Q. Garcia, Esq.
California Public Utilities Commission
3 5066 State Building
San Francisco, CA 94102
4

5 Dated April 17, 1981

Phyllis M. Gallagher

PHYLLIS M. GALLAGHER

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