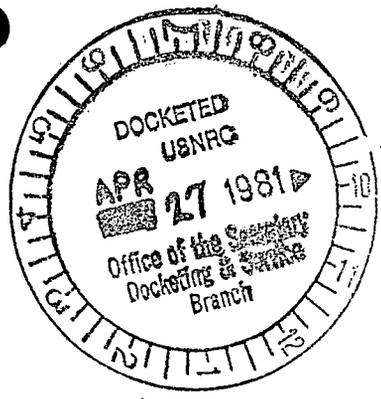


4/22/81

RELATED CORRESPONDENCE

RICHARD J. WHARTON, Attorney  
USD LEGAL CLINICS  
Alcala Park  
San Diego, CA 92110  
291-6480, Ext. 4376



Attorney for Intervenors

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~~

INTERVENORS F.O.E. ET AL.  
ANSWERS TO FIFTH SET OF  
INTERROGATORIES PROPOUNDED  
BY APPLICANTS SOUTHERN  
CALIFORNIA EDISON COMPANY

INTERROGATORY NO. 1:

Do you contend that the San Clemente Plan does not adequately comply with the Federal Requirements? If so,

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

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

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

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

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(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 before the ASLB with respect to the San Clemente Plan and, as to each witness so identified, please provide the following information:

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

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

(3) 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.

(a) 10 C.F.R. 50.47(a)(2); 50.47(b)(1,3,5,6,7,10,12,13,14, and 15).

(b) Without the Standard Operating Procedures which supplement the San Clemente Plan, the Plan cannot be adequately analyzed. However, Intervenors have found these problems with the San Clemente Plan.

10 C.F.R. § 50.47(a)(2) - The San Clemente Emergency Plan is not capable of implementation for the reasons as 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 and equipment.

10 C.F.R. § 50.47(b)(5)(6) - The notification and communication network is inadequate. The San Clemente notification and communication plan incorporates Attachment 12 of the IAEP which needs clarification. The routes and frequencies to be used between emergency decision centers are not clear. Communications specialists have agreed that the communications network is not understandable at the present time. Furthermore, no "alternative communications system" is specified for emergency notification, in the event telephone communications are disrupted.

10 C.F.R. § 50.47(b)(7) - There is no Public Information and Education plan developed for San Clemente.

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

- 1) The evacuation plans do not give adequate consideration to the wide range of possible conditions and circumstances under which the evacuation may occur (i.e. - Earthquake; 3:00 a.m. and heavy rain; 4:00 p.m. Labor Day weekend, etc.)
- 2) Too many persons have the authority to order evacuations.
- 3) There are no details as to the storage and distribution of potassium iodide tablets.

10 C.F.R. § 50.47(b)(12) - There is no criteria for determining the training or equipment necessary for a medical

facility to properly deal with radioactively contaminated or injured persons. Furthermore, there is no proof that arrangements have been made with medical facilities.

10 C.F.R. § 50.47(b)(13) - The recovery and re-entry plan is inadequate in that no specific, detailed criteria have been established.

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

- (c) 1) San Clemente Emergency Plan
- 2) Federal Regulations
- 3) Interagency Agreement and Evacuation Procedure

(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. 2:

Have you analyzed or do you intend to analyze the San Clemente Plan? If so,

(a) Identify when such analysis was performed or is expected to be performed;

(b) Identify each and every person who has performed or who is to perform such an analysis;

(c) State whether each such analysis will be voluntarily provided to Applicants without further motion to produce such analysis; and

(d) Identify each and every document or communication wherein such analysis may be found or is referenced.

ANSWER TO INTERROGATORY NO. 2:

2. No.

INTERROGATORY NO. 3:

Have you discussed the San Clemente Plan with representatives or employees of the City of San Clemente, or the representatives or employees of any other offsite assistance agency? If so,

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

(2) Identify each and every document or communication pertaining to your discussion of the San Clemente Plan with each person identified in subparagraph (1) immediately above.

ANSWER TO INTERROGATORY NO. 3:

3. No.

Dated: April 22, 1981

Respectfully submitted,

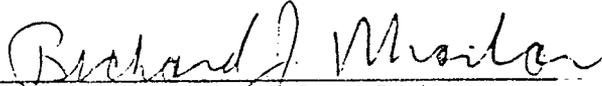
  
RICHARD J. WHARTON, Attorney  
for Intervenor  
F.O.E. ET AL

VERIFICATION

RICHARD J. WHARTON, affirms that

1. That he is counsel for Intervenors, Friends of the Earth et al., in this proceeding.
2. That he is authorized by Intervenors F.O.E. et al., to execute and verify the foregoing "INTERVENORS F.O.E. ET AL. ANSWERS TO FIFTH SET OF INTERROGATORIES PROPOUNDED BY APPLICANTS SOUTHERN CALIFORNIA EDISON COMPANY".
3. That he is informed and believes and upon such information and belief affirms that the foregoing "INTERVENORS F.O.E. ET AL. ANSWERS TO FIFTH SET OF INTERROGATORIES PROPOUNDED BY APPLICATNS SOUTHERN CALIFORNIA EDISON COMPANY" is true and correct.

Dated: April 22, 1981

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

## CERTIFICATION OF SERVICE

I hereby certify that on the 22nd day of April, 1981, a copy of the INTERVENORS F.O.E. ET AL. ANSWERS TO FIFTH SET OF INTERROGATORIES PROPOUNDED BY APPLICANTS SOUTHERN CALIFORNIA EDISON COMPANY, 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:

James Kelley, Esq., Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

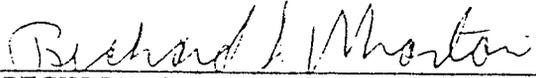
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State Geologist  
CDMG  
1416 Ninth Street, Room 1341  
Sacramento, California 95814

Dated: April 22, 1981

Respectfully submitted,

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