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LEAGUE OF WOMEN VOTERS

OF SAN LUIS OBISPO, CALIFORNIA
Route 1, Box 170, San Luis Obispo, Ca.

October 29, 1979

10/29/79



Joseph M. Hendrie, Chairman
Victor Gilinsky, Commissioner
Richard T. Kennedy, Commissioner
Peter A. Bradford, Commissioner
John F. Ahearn, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

The League of Women Voters of San Luis Obispo urges the Nuclear Regulatory Commission to conduct full public hearings in San Luis Obispo, California on the lessons learned at Three Mile Island as they pertain to the Diablo Canyon Nuclear Power Plant.

We would like the Commission to issue an Order and Notice of Hearing specifying procedures for proceeding to consider these issues and inviting public participation. The residents of San Luis Obispo County must be given the opportunity of listening to the findings of the investigations of the TMI incident and must be allowed the opportunity for input.

One of the problem areas that arose at TMI was in emergency planning. Our League responded to the NRC's questions concerning regulations to be adopted for nuclear emergency plans (see enclosure). After studying our County's emergency plans, we concluded that an effective plan should be proven operational and that NRC concurrence with local and State plans should precede licensing.

The League of Women Voters of California, in April, 1979, unanimously passed a resolution calling for a full investigation of TMI and prompt public disclosure of the findings. TMI has raised new issues which are being investigated by the NRC as well as the President's Commission and Congressional committees. It would be prudent to renotece the ongoing Diablo Canyon licensing proceedings and provide the local public an opportunity to be informed of and participate in the resolution of all new issues raised not only by the NRC staff but by the other ongoing investigations as well. (We refer to our previous letters of May 30 and September 29.) Thank you.

Sincerely,

Helen Carr, President

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LEAGUE OF WOMEN VOTERS

OF SAN LUIS OBISPO, CALIFORNIA

August 27, 1979



RESPONSE TO TOPICS PUBLISHED IN THE FEDERAL REGISTER,
JULY 17, 1979, CONCERNING NRC REGULATIONS TO BE
ADOPTED FOR NUCLEAR EMERGENCY PLANS.

1. What should be the basic objectives of emergency planning? Reduce public radiation exposure? Prevent public radiation exposure? Capability to evacuate the public? To what extent should these objectives be quantified?

The League of Women Voters advocates that all energy facilities, including nuclear plants, be operated in a manner that protects the public's health and safety. Based on this position, the League urges that nuclear emergency planning emphasize the prevention of public radiation exposure. Should the public be exposed, such exposure should be as minimal as possible.

Thus, emergency planning should provide for evacuating the public since evacuation may be the only way to protect the public during a serious nuclear event. Evacuation plans should be prepared based on several realistic scenarios.

2. What constitutes an effective emergency response plan for state and local agencies and for NRC licenses? What are the essential elements that must be included in an effective plan? Do existing NRC requirements and guidance lack any of these essential elements?

An effective emergency plan should be proven capable of evacuating the public and should be demonstrated to be "operational".

The San Luis Obispo County Administrative Office has stated that "It must be recognized that these documents (the county emergency plans) in themselves do not represent a comprehensive emergency response system".

(1) The statement lists necessary implementation procedures as follows:

- a) Coordination of emergency procedures with other governmental levels and agencies,
- b) Training of personnel,
- c) Instruction and education of the public,
- d) The availability of special equipment, and
- e) Conducting effective exercises to test the plans.

We feel these are reasonable requirements.

Footnote(1). Ltr., May 1979, County Admin., San Luis Obispo to the Cal. State Energy Commission.



In addition, emergency planning should give special consideration to the following elements:

- a) Emergency operations centers should meet NRC safety guidelines and be included in plans;
- b) Local decontamination facilities for the general public and emergency personnel should be provided. Protective clothing for emergency rescue workers (firemen, policemen, etc.) should be readily available;
- c) (1) Reassessment of the concept of the Low Population Zone (LPZ) in evacuation and monitoring programs is needed. Several recent reports have suggested that the existing (2) 3 to 6 mile area should be increased upwards to 50 miles for evacuation planning in a serious event (core melt).
(2) Special attention should be given to possible future growth and siting of hazardous facilities in the Low Population Zone since development controls lie with local and state agencies, not with the NRC. Currently, extensive residential, commercial and recreational plans have been proposed in the Avila and Pismo Beach areas within 8 miles of the Diablo Canyon Nuclear plant site.
- d) Evacuation and protection of large seasonal populations, such as those at Avila Beach near Diablo Canyon, should be included;
- e) Fully operational communication systems which do not depend on public telephones should be established;
- f) There should be training for all local agency personnel who will be used in an emergency. These people may be the only officials available during the initial hours of an emergency, particularly in relatively isolated areas, such as San Luis Obispo.
- g) A radiation monitoring system independent of the licensee should be established to gather background data and monitor radiation releases.

Furthermore, creative thought must be given to public participation in drills. Actual evacuations of public may be unnecessary and counter-productive. On the other hand, limited run-throughs by government officials may be so far from reality as to be misleading in a real situation.

Drills should be performed that simulate reality as closely as possible. For instance:

- a) School buses could be sent from the schools to evacuation centers, testing equipment, capacities, travel times, etc., without actually moving students;

Footnote (2). "Radioactive Materials in California", Report of the Secretary for Resources, State Task Force on Nuclear Emergency and Radioactive Materials, April, 1979.



- b) Hospital personnel could perform realistic exercises moving gurneys to exits, etc., without moving patients. Other institutions such as nursing homes and jails could work out similarly realistic drills;
- c) Residential populations could be informed of the test drill and given instructions on actions to take in a real emergency;
- d) Rural populations must be included.

At least one successful exercise should be conducted and should precede licensing of any nuclear power plant.

4. Should prior NRC concurrence in the associated state and local emergency response plans be a requirement for the issuance of any new operating license for a nuclear power plant? If so, when should this general requirement become effective?

Based on our League's position that the protection of the public's health and safety is paramount in operating energy facilities and that efficient government requires clear assignment of responsibility and coordination among different agencies of government, we support prior NRC concurrence in response plans as a requirement for issuance of a new license.

Such NRC concurrence would help to provide coordination of all public action at all levels, and to recognize that NRC guidelines are in fact often used as standards in emergency planning by other public agencies. For instance, during the investigation of emergency planning for the Diablo Canyon plant by the committee of the League of Voters, we were told by local officials that the state is responsible for population decontamination facilities. However, French Hospital, the only decontamination center in San Luis Obispo, has facilities for only six patients, and a contract to care for Diablo Canyon employees as required by NRC guidelines. We are left with the impression that many agencies feel that their responsibilities in terms of public decontamination have been met because the NRC requirement has been met, although there are no decontamination facilities for the general public.

Further, we are concerned about the need for sophisticated technical knowledge about nuclear facilities and radiation exposure which may not be affordable by lower levels of government during the planning process but which is available to the NRC.

5. Should financial assistance be provided to state and local governments for radiological emergency response planning and preparedness? If so, to what extent and by what means? What should be the source of the funds?

The League of Women Voters of San Luis Obispo believes that efficient government requires adequate financing and coordination among the different agencies and levels of government. Since the benefits of nuclear power plants will be felt primarily outside the local area, the costs should not fall solely on local governments. Funds must be sought from every available source.



6. Should radiological emergency response drills be a requirement? If so, under whose authority: Federal, State or local government? To what extent should Federal, State and local governments and licensees be required to participate?

The League of Women Voters of San Luis Obispo supports realistic evacuation exercises involving the network of emergency services and testing all necessary equipment for proper functioning (i.e.: buses, radios, etc.)

Our League has no position concerning who should have ultimate authority for holding such a drill. In an actual event, all levels of government would respond, therefore they should all be involved in the drill. Also, Federal and State agencies and the licensee should assist the local governments by providing expert guidance during and after the exercises.

Based on our local investigation of Diablo Canyon emergency planning, we recommend that an emergency response drill should:

- a) Involve the public as much as possible and be subject to public review and input;
- b) The exercises should be conducted periodically and be based on different scenarios using varying time of day, weather conditions and type of accident;
- c) Give special attention to a simultaneous earthquake and nuclear emergency;
- d) Cover the full range of possible number of people hurt and contaminated;
- e) Include a final report on evacuation/emergency exercises, which should be subject to public review and comment at an open hearing.

7. How and to what extent should the public be informed prior to any emergency concerning emergency actions it might be called upon to take?

The public must be informed of measures to prevent or cope with emergencies, and plans and procedures should be subject to citizen review and comment. The public needs to be given full information concerning its responsibilities in such an emergency. The public should be involved as actively as possible in all evacuation planning, drills, and plan evaluations.

The public also needs to be educated and instructed about personal and public health measures, such as "do you drink the water?". Perhaps such information could be included with property tax statements, city notices, newsletters, utility bills, etc.

9. Under what circumstances and using what criteria should a licensee notify State, local and Federal agencies of incidents, including emergencies?



We recognize that timely notification is essential as well as the fact that there may well be technical and political differences of opinion as to the meaning of "timely". From the experience of Three Mile Island and the resulting confusion between levels of government, it appears that specific levels of command must be established as well as specific criteria defining degrees of emergency and corresponding population protection procedures. Without such procedures an unnecessary burden may be placed on "lay" decision-makers.

Consideration should be given to mechanical means of notification as an adjunct system. Consideration should also be given to a hot line in addition to radio control between the licensee and the responsible public agencies in case the public telephone system is over-loaded or damaged in a serious event.

12. Should the licensee be required to provide radiological emergency response training for State and local government personnel? If so, to what extent? Should the Federal government provide such training? If so, to what extent?

See Question 2, part f in answer on page 2.

14. Would public participation in radiological emergency response drills, including evacuation, serve a useful purpose? If so, what should be the extent of the public participation?

See Question 2 for response.

Respectfully submitted,
Louise Radcliffe
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