

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PACIFIC GAS AND ELECTRIC COMPANY

(Diablo Canyon Nuclear Power Plant,
Units 1 and 2)

Docket Nos. 50-275 O.L.
50-323 O.L.

AFFIDAVIT OF KURT P. KUPPER

I, Kurt P. Kupper, being duly sworn, state under oath the following:

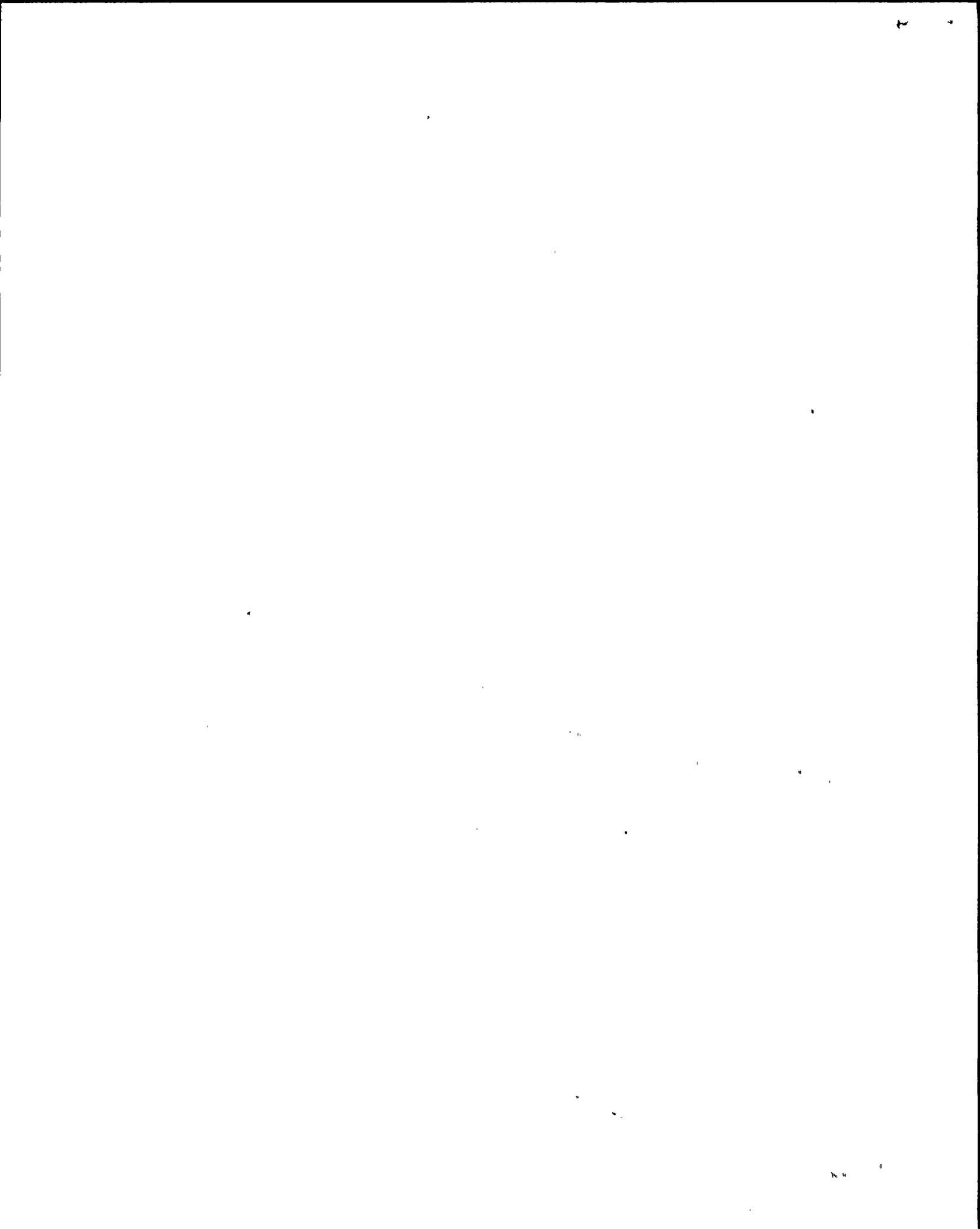
(1) I am a member of the Board of Supervisors of San Luis Obispo County ("County"), California, having served on that Board since January 1973. I reside at Route 3, Box 161E, San Luis Obispo, California.

(2) As a member of the Board of Supervisors, I am responsible, with other Board members, for the overall direction of County activities relating to the safety of the residents of the County, including their safety in the event of a radiological emergency at the Diablo Canyon Nuclear Power Plant.

(3) I am familiar with the current County emergency plans designed to provide for offsite emergency response under County direction to a radiological emergency at Diablo Canyon.

(4) Although the County has current emergency plans on paper, those plans would not provide substantial protection to County residents or the general public in the event of a radiological emergency at Diablo Canyon. This is because the County has not made sufficient preparations to implement these plans and thus is not prepared

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to respond to an emergency at Diablo Canyon. This lack of preparedness results from, among other things, the following:

(a) There has been no adequate training or coordination of County personnel who would be required to implement the plans;

(b) Important equipment necessary to effective emergency response, including communications equipment, is not available;

(c) There have been no full-scale exercises to demonstrate effectiveness of the plans;

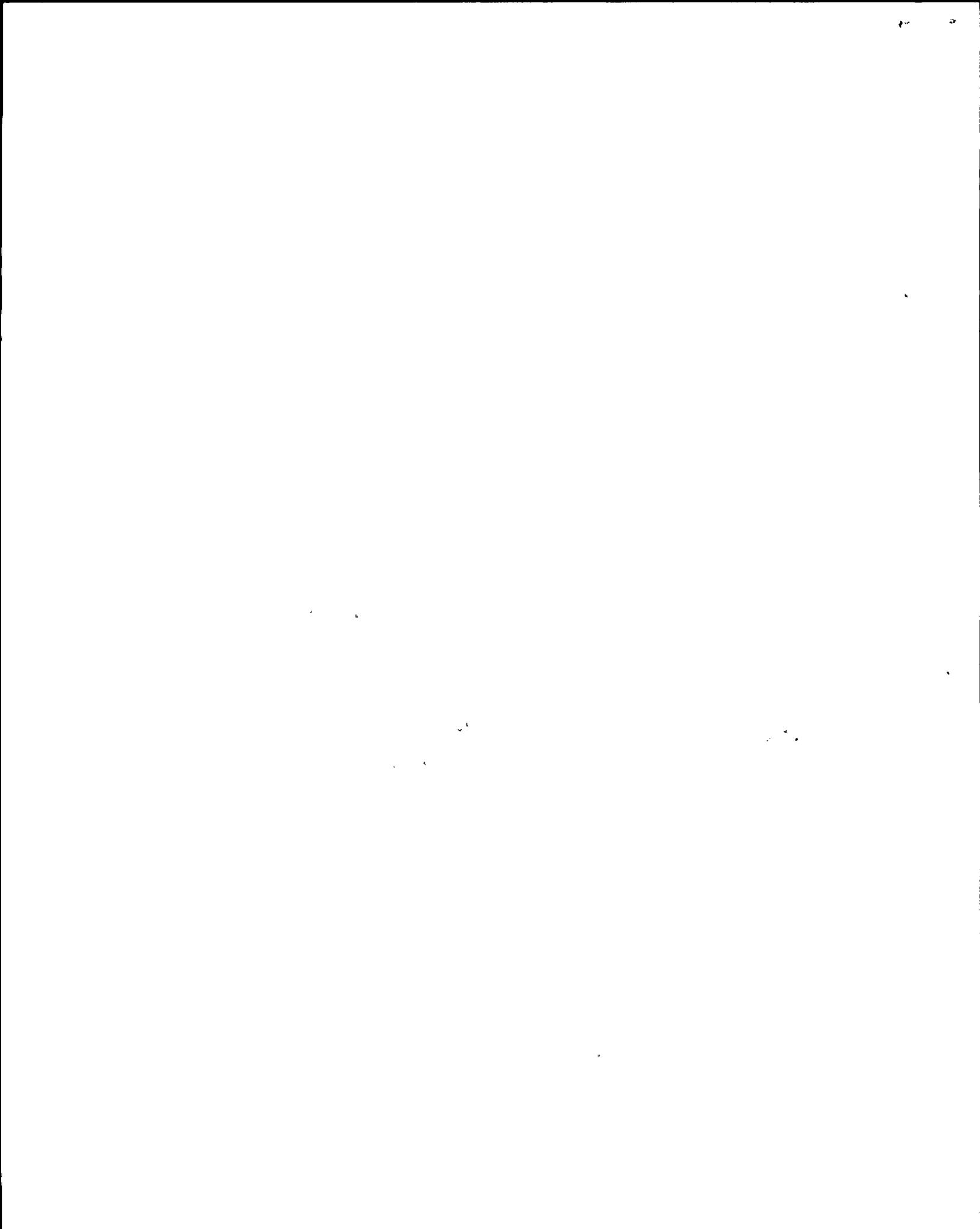
(d) There has been no systematic public information program designed to educate the public on necessary actions, including evacuation and shelter, to be taken in the event of a radiological emergency; and

(e) Inadequate medical facilities exist to transport and treat persons injured in a radiological emergency.

(5) Indeed, the training and exercises specifically called for in Section V (I) of the County Emergency Response Plan and which are crucial to effective preparedness are, to my knowledge, entirely lacking. There are no plans for the County to implement the current plans and thus to create the necessary preparedness to respond to a radiological emergency at Diablo Canyon.

(6) Even if the County were to implement the current plans, the state of preparedness would be inadequate, because the plans do not prepare for a Diablo Canyon emergency in conjunction with a major earthquake on the Hosgri Fault.

(7) The lack of preparedness to respond to a Diablo Canyon emergency is a condition which has continued for several years. I have repeatedly emphasized the need to create actual preparedness, and was

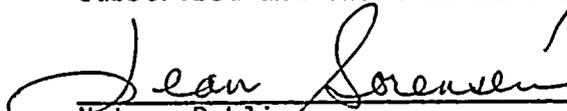


finally successful only last June 1980 in increasing the size of our staff from one part-time emergency services officer to two full-time positions, the second position having now been filled only two months. In any case, the efforts of these men have not been directed toward the existing plan because of its inherent inadequacies, and no actions have been forthcoming to implement the plans.

(8) The County currently is working to prepare a new emergency plan designed to comply with state law requirements, as well as those regulatory requirements of the Nuclear Regulatory Commission promulgated on August 19, 1980. That new plan is only at the concept stage and will not be completed until late this summer, at the earliest. Steps to implement that new plan, i.e., to create preparedness to respond to a radiological emergency, will not be taken until after the final plan is prepared. I have substantial concern for the adequacy of the new plans, because the County Board of Supervisors voted recently not to include in the plan detailed analysis of the effects of an earthquake such that the plan will respond to such scenarios in conjunction with a Diablo Canyon emergency. Accordingly, for the foreseeable future, the County will not be able to respond effectively to a radiological emergency at Diablo Canyon, and even after the new plans are prepared and implemented, their adequacy may be lacking.


Kurt P. Kupper

Subscribed and sworn to before me this 31 day of March, 1981.


Notary Public

My commission expires: 1/14/83



