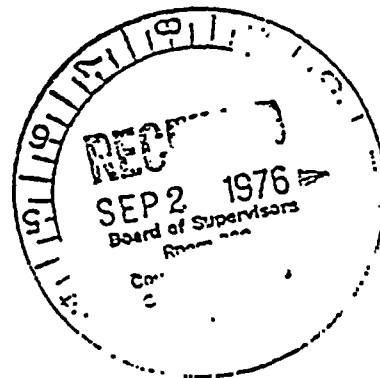




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

August 19, 1976



The Honorable Robert J. Lagomarsino
United States House of Representatives
Washington, D.C. 20515

Dear Congressman Lagomarsino:

Your letter of July 1, 1976 addressed to Carlton Kammerer, Director of our Office of Congressional Affairs, has been referred to me for reply.

Your letter forwarded a copy of a letter dated June 2, 1976 from Dr. Richard J. Krejsa, Vice Chairman and Supervisor, 5th District, San Luis Obispo County, addressed to the Board of Supervisors, County of San Luis Obispo. Attached to Dr. Krejsa's letter is a report prepared by Dr. Krejsa (based on student surveys) which deals with the status of emergency planning in San Luis Obispo County relative to the Diablo Canyon nuclear power facility.

The report by Dr. Krejsa paints a rather bleak picture of emergency preparedness capabilities in San Luis Obispo County and, if the situation is as Dr. Krejsa indicates, we believe that more support should be given to the proper local government authorities responsible for emergency preparedness. The level of preparedness actually achieved by a local government is both a function of its commitment to a viable emergency planning and response program and a function of its resources. These are matters largely controlled by local governments and, in some cases, by the Federal or State governments where Federal or State funding or resources are supplied to augment those of local government. We encourage resolution of these problems at the local level.

Although we have no personal knowledge of how the local people answered the questions posed to them, we have several documents on file which seem to indicate that the emergency preparedness capabilities are better than indicated although they may be in need of improvement in certain areas. Emergency planning for potential accidents at nuclear power plants is one of the requirements which the NRC imposes upon applicants for licenses to construct and operate nuclear power plants. These requirements, in general terms, are given in 10 CFR 50, Appendix E (Enclosure 1). Specifically related to this concern is Section IV.D which states that the applicant must make arrangements with local officials and agencies for any help that may be needed in an emergency. Before an applicant is given a license to operate his facility, he must determine that he has met the requirements. In the case of Diablo Canyon, the NRC's Safety Evaluation Report

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Exhibit C

It is also our belief that the San Luis Obispo authorities are probably reluctant to approve additional funds for planning around the Diablo Canyon facility because of the low population surrounding it. Within the area encompassed by a six mile radius from the plant, there is a total population of only about 18 people. The county authorities may believe that their limited funds could best be spent elsewhere.

Before concluding, we also wish to comment on the role of the Pacific Gas and Electric Company. Item 7 on page 5 of the report is not entirely correct when it states that the responsibility of PG&E is confined to the area within the plant gates (otherwise known as the exclusion area). PG&E's authority is confined to the exclusion area, but their responsibility extends beyond that. For example, all nuclear power plants have an area beyond the exclusion area called the low population zone (LPZ), the size of which is determined by the license applicant but is such that it must meet certain dose rate limitations. The operators of the facility must design and operate the facility such that the dose rates in the LPZ in the event of an accidental radiological release are below the defined values.

In addition, the last sentence of Item 7 on page 5 of the report appears to be misleading when it states that PG&E's responsibility would be discharged once it notified the Nuclear Regulatory Commission and the Sheriff's Office. The regulations (10 CFR 50, Appendix E) clearly state that the initial accident assessment is the responsibility of the licensee, and that the licensee's emergency planning will include provisions for determining the magnitude of the release including criteria for determining the need for notification and participation of local and State agencies, and criteria for determining when protective measures should be considered.

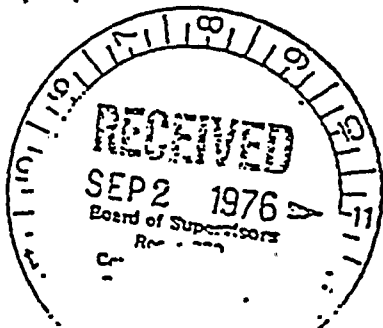
In conclusion, the NRC is satisfied that the Diablo Canyon facility emergency plan meets all of the requirements of the licensing regulations. The county has said that it has the capability to respond if necessary and we have provided additional training for this purpose. We believe that the county should have a radiological emergency response plan and should test this plan to see if there are weaknesses. Unfortunately, we do not have a copy of any county plan, other than the Sheriff's Department Evacuation Plan.

We are sorry we cannot be more definite in our response to your letter but we hope we have shed more light on the concerns raised by Dr. Krejsa. We encourage and applaud his efforts to improve the emergency planning and preparedness situation in San Luis Obispo County.

Sincerely,



Lee V. Gossick
Executive Director for Operations



...and well into the night had been dealt with in their planning.

The hearing was conducted by the California Energy Resources Conservation and Development Commission.

Commissioners on hand with members of their staff were Alan Pasternak and Ronald Doctor. The commission is to decide if San Luis Obispo County's emergency response and evacuation plans for the Diablo plant are adequate.

Periodically throughout the hearing, Pasternak and Doctor clashed. Pasternak accused Doctor — chairman of the hearing — of being responsible for "an imbalance" in testimony critical of nuclear plants.

Doctor charged that Pasternak's perception was "narrow" and said Pasternak's statements bordered on "paranoid" and were "unbecoming of your office."

Doctor was responsible for having a conference telephone set up at the

On hand for additional testimony that was critical of nuclear plant safety planning were Dr. Roland Finston, health physicist from Stanford University and Dale Bridenbough, nuclear engineer who formerly worked for General Electric and represented Mothers for Peace.

Dr. William J. Lindbald, PG&E project engineer at Diablo, said almost everything Bridenbough advocated was already a part of the planning at Diablo Canyon. Bridenbough said in his testimony that he was not familiar with the engineering for Diablo Canyon.

"At times we thought he (Bridenbough) was testifying for us," said Dr. Lindbald.

Dr. William Brunot, PG&E nuclear engineer, charged Dr. Finston's testimony contained "some inaccurate statements." He said Finston "misused the data."

Finston painted a frightening picture of what he said might be an expected outcome to a major disaster

within 60 days.

Along with Beyea and Kendall, he called for "site specific studies" to help determine what could happen.

Dr. Brunot said Dr. Finston's accident was not "most likely" and labeled it "nonsense." He said the report cited by the Stanford professor actually figured out to be a one in 1-million theoretical possibility.

"It would be the least likely accident..." he said.

"The risk of public exposure would be very small" at Diablo, said Dr. Brunot. He said safety and "the prevention of accidents is a major concern" for PG & E.

Dr. Brunot stressed the "outstanding record" of safety in the nuclear energy industry. He said the risk from accidents was "much smaller" in the nuclear energy industry than in other industries.

He said that extensive site specific studies have been done.

He added that "public risk at

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Nuclear Plant Safety

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Diablo is lower than at other nuclear plant sites, and there are fewer people" in the plant area.

Dr. Richard Kresja, member of the San Luis Obispo County Board of Supervisors, criticized his county's pace and level of expenditures in preparing plans involving evacuation procedures and other safety concerns relating to the Diablo plant.

He raised several critical points, including the charge that PG&E has no formal agreement for medical care from nuclear accidents with any hospital in the county, only with some doctors.

PG&E disputed the contention and said they do have a formal agreement with Sierra Vista Hospital for treatment.

(Glenn Carlson, administrator at Sierra Vista Hospital, told The Times by telephone that the hospital does not have a binding agreement, or any kind of agreement with Pacific Gas and Electric. He said there has been contact between the two, including a letter, but "no agreement.")

Doctor called Kresja's charge "astounding."

Burt Townsend, staff member with the SLO County Health Agency; Tony Morris, licensed medical technician at SLO County Hospital and Dr. David Lenderts, engaged in emergency medicine in San Luis Obispo, all raised concerns about medical staff willingness to treat victims of nuclear accidents. They also said there has been inadequate training for such treatment.

James Haywood, regional Office of Emergency Services, said the commission could obtain studies that showed such fears were probably unfounded.

George Silva, civil disaster coordinator for San Luis Obispo County, outlined the county's plans for evacuation if it were ever necessary. He said agreements have not been made with incorporated cities, but suggested an accord could be reached.

Numerous witnesses raised concerns about safety planning and the adequacy of the county's evacuation planning.

James Shiffer, PG&E nuclear engineer, said Diablo's emergency plans were predicated "on any accident" that might occur.

Exhibit D

Exhibit D

