

189 San Jose Court
San Luis Obispo, CA. 93401
5 December 1978

Atomic Safety and Licensing Board
Nuclear Regulatory Commission
c/o San Luis Bay Inn
Avila Beach, California

Honorable Chairperson and Members:

My name is Richard J. Krejsa, I am a concerned property owner taxpayer, father and husband in San Luis Obispo. I am also a Professor of Biological Sciences at Cal Poly State University. I teach "General Biology" and "Introduction to Conservation" on a part-time basis and therefore try to keep current on public issues which affect the quality of life and/or our natural resources. One of my functions as a teacher is to make students aware and to make them think about the world they have inherited.

One of the things I emphasize is energy and energy waste in society. In fact, we are still in an energy crisis situation. But, contrary to what P.G. & E. would have us believe in the rash of ads that always seem to sprout in local newspapers prior to such hearings as these, the crisis is not in electrical energy. It is, primarily, one of heat energy and vehicular fuel energy. Making more electricity is not a rational response to the shortage of fossil fuel energy!

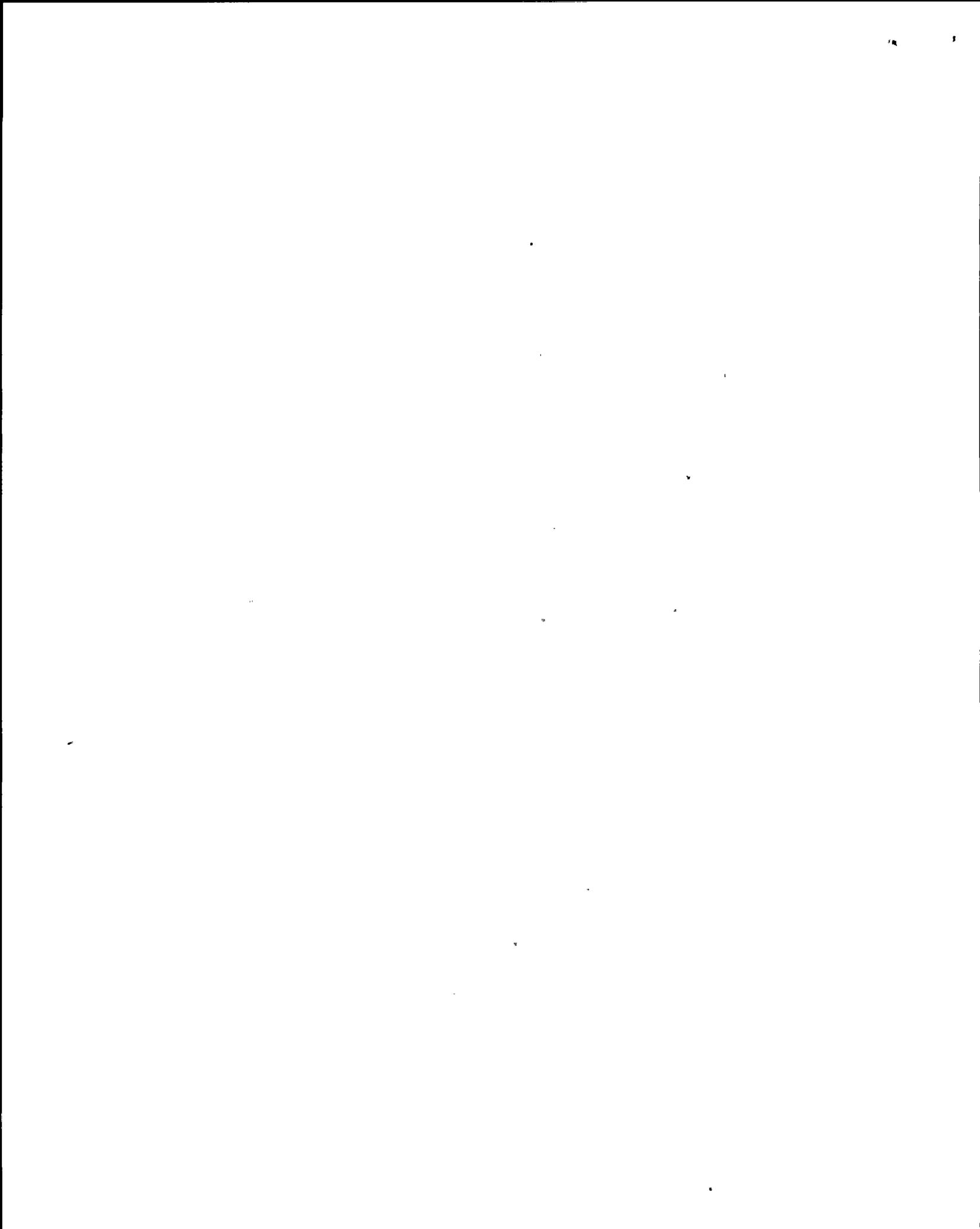
It is my understanding that nuclear markets and nuclear expectations in member nations of the O.E.C.D. (Organization for Economic Cooperation and Development) are collapsing. According to Amory Lovins, "the nuclear era, far from being inevitable, is already a dead letter in the market economies."

This outside perspective, is very interesting because we here locally tend to see things parochially. But outside the County, people are concerned also. My mother, for example, who is neither pro- nor anti-nuclear, sends me articles from her local newspaper, The San Diego Union. My mom worries about me and my family because we live so close to Diablo. She sent me this clipping most recently, dated 15 November 1978, It's entitled: "Diablo Canyon: A Horrible Example."

The article begins by stating:

"The massive hulk stands on a bluff overlooking the Pacific Ocean, a monument to the bad faith, arrogance and incompetence that have become the hallmarks of the controversy over the future of nuclear power."

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It further states:

"The current cost-to-completion projection is \$1.4 billion and the plant has become a grotesque example of worst-case planning gone berserk."

I'd like to pursue that point on a different tangent, one which deals with how decisions are made in public by government, commissions, or agencies supposedly designed to serve the people.

In reality, with all due respect to your honorable members, what we witness here today and at other hearings is an example of what has become known as the "science of muddling through." Elsewhere, it has been given a more bureaucratic name by Charles Lindblom who calls it the "disjointed incrementalism" approach to public policy making.

In such a decision-making process, changes are made step-by-step and the decision-makers need only understand the specific context of the choice currently in front of them. In today's case, seismic safety; but at other times and places, cost, radioactivity, reactor safety, environment, reactor uranium supply, nuclear terrorism, proliferation of nuclear weapons, waste disposal and transportation! And except for the intervenors and members of the public, no one government agency takes, or bothers to search for, a broader perspective on the situation. In fact, it's considered a waste of time and energy.

No sense of purpose is evident to anyone who tries to find one and the changes, as long as they are careful and not too abrupt, slide into acceptability.

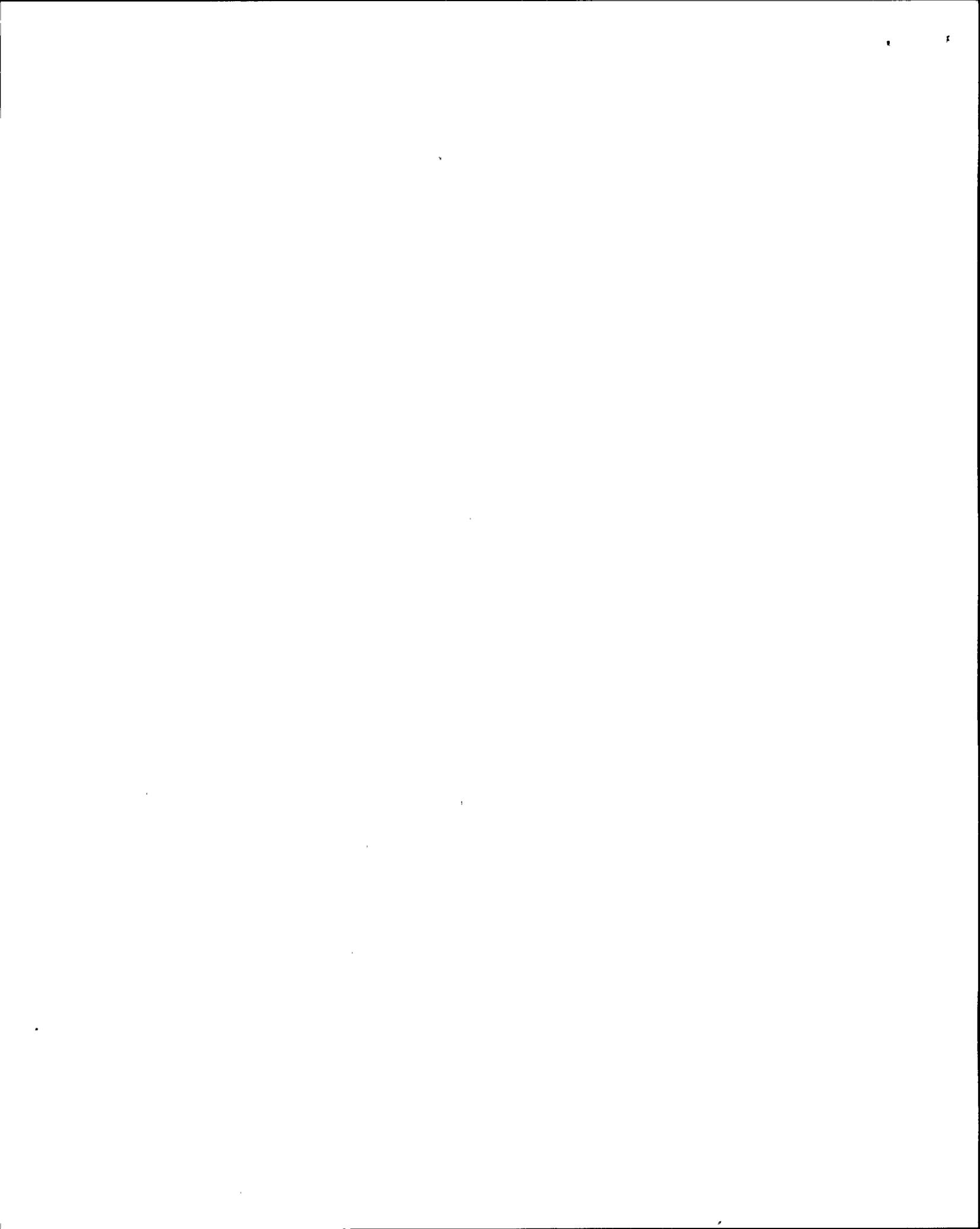
According to Langdon Winner, in his book: "Autonomous Technology," "... incrementalism offers an elaborate justification for ignoring the concept of the public once and for all!"

Ladies and gentlemen, we have too long assumed that human logic and technology could solve all our problems. Much of our technology today is becoming counter-productive of its original intent. Some problems cannot be solved, but we are too arrogant to accept that. According to David Ehrenfeld in his book "The Arrogance of Humanism," "what we need is a more humble view, one that recognizes that natural laws also govern our lives."

I subscribe to that view and respectfully urge your consideration of it also.

Thank you.

/s/ Richard J. Krejsa



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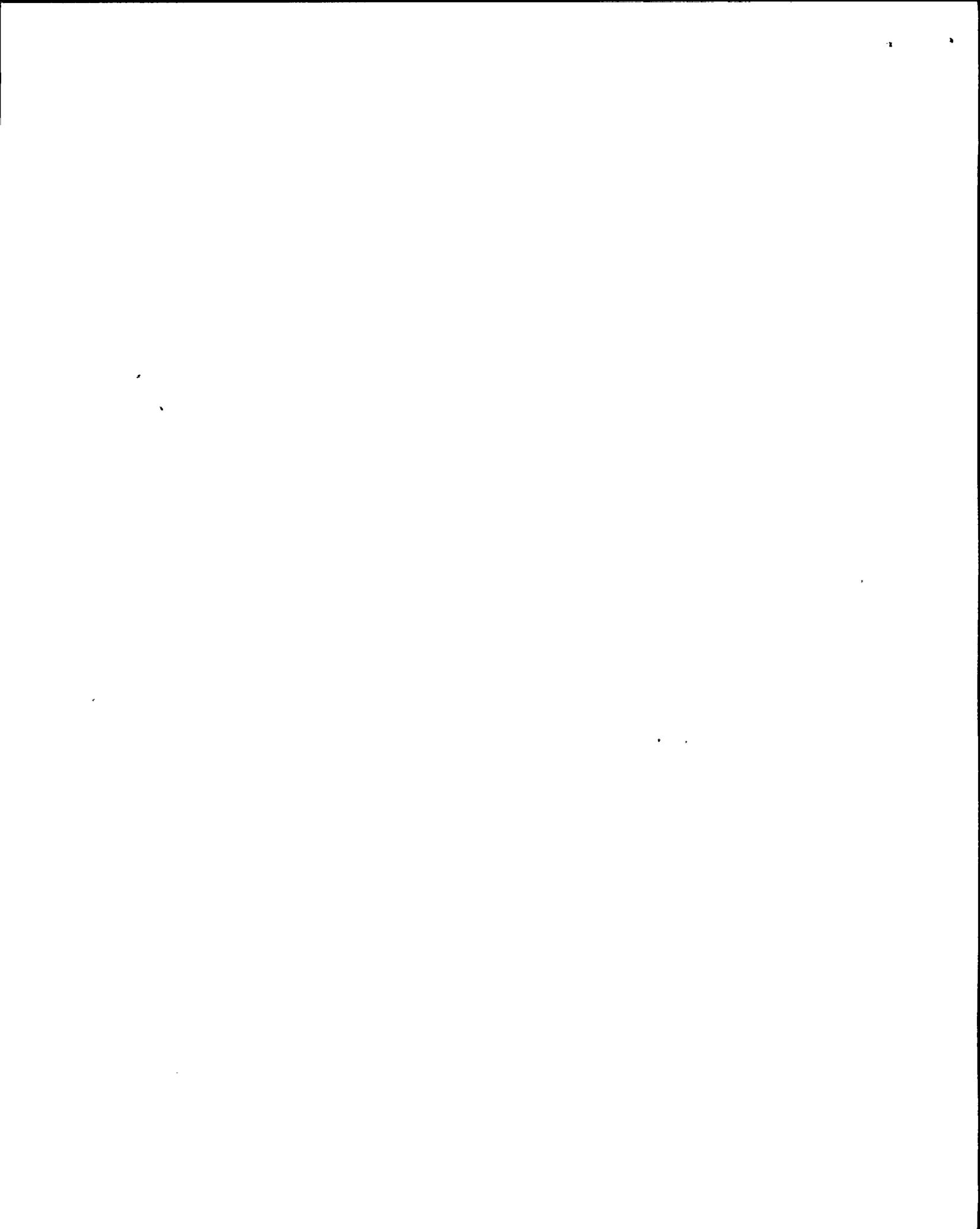
Diablo waste plan urged

San Luis Obispo County should take steps to safeguard the public from dangers of radioactive material being transported through the county, Supervisor Richard J. Krejsa said Tuesday.

County supervisors agreed to consider the matter at their Jan. 15 meeting.

Krejsa said he was particularly concerned about transportation of radioactive waste canisters from the Diablo Canyon nuclear power plant north of Port San Luis.

The canisters, which weigh more than 100 tons, will be trucked on Avila Road to Pismo Beach for shipment, Pacific Gas and Electric Co. spokesman Richard P. Davin said.



A SURVEY OF NUCLEAR ACCIDENT PREPAREDNESS
IN SAN LUIS OBISPO COUNTY, CALIFORNIA

By

Dr. Richard J. Krejsa
Supervisor, Fifth District
San Luis Obispo County
June 2, 1976

ABSTRACT

Due to the presence of two nearly-completed nuclear reactor units, an attempt was made to ascertain the state of nuclear emergency preparedness of private and public agencies in San Luis Obispo County. Representatives of agencies having primary involvement in the event of a nuclear emergency were interviewed by two independent student survey teams in December, 1975, and again in March, 1976. Results indicate that the overall state of preparedness is low. While some few agencies are aware of their responsibilities in the event of a nuclear accident, most agencies are prepared only for a general emergency. However well the public or private agencies are becoming prepared to coordinate their activities in the event of a nuclear emergency, few have the budget, equipment, or trained personnel necessary to carry out their function in a responsible manner.

Students in both survey classes were unanimous in their evaluation that most San Luis Obispo County public and private agencies are not prepared or sufficiently trained to handle a nuclear emergency should one occur now or within the immediate future.

INTRODUCTION

San Luis County, by virtue of two nearly-completed nuclear reactor units at Diablo Canyon, has entered the nuclear age. In connection with an energy-related course at Cal Poly ("Technology in the Twentieth Century"), I thought it would be of general interest to determine whether or not, in the event of a nuclear accident, appropriate county-wide coordination procedures existed and adequate training was received by the responsible emergency service related individuals.

By means of two independent student-coordinated surveys, I sought the answers to two general questions:

- 1) Were a nuclear accident to occur in San Luis Obispo County this year, are the various private and governmental agencies prepared to coordinate the resulting emergency?
and
- 2) Are the responsible private and public emergency personnel adequately trained to deal with an off-site radioactive contamination?

Survey results indicate the answer to the first question is "partly yes, partly no". The answer to the second is an unequivocal "NO!"

HISTORICAL BACKGROUND

Early last year, in the draft version of the Hazardous Wastes section of the Solid Waste Management Plan, the County-Cities Solid Waste Management Committee addressed several of the known or potential problems related to storage, handling, and disposal of nuclear wastes. Last November, however, the County began the process of formulating a Nuclear Power Plant Emergency Response Plan (NPPERP) in accordance with a state mandate. The purpose of this plan is to coordinate the various private and public agencies that would be called upon to respond to a nuclear crisis. When the Solid Waste Management Committee learned that the County Civil Disaster Coordinator was preparing the NPPERP, those draft sections of the Solid Waste Management Plan dealing with nuclear waste problems were eliminated. According to the County Civil Disaster Coordinator, Mr. George Silva, the draft NPPERP is near completion. It is my understanding that the plan will not address problems of nuclear waste handling and disposal, or the more imminent problem of long term spent fuel storage at the Diablo Canyon site.

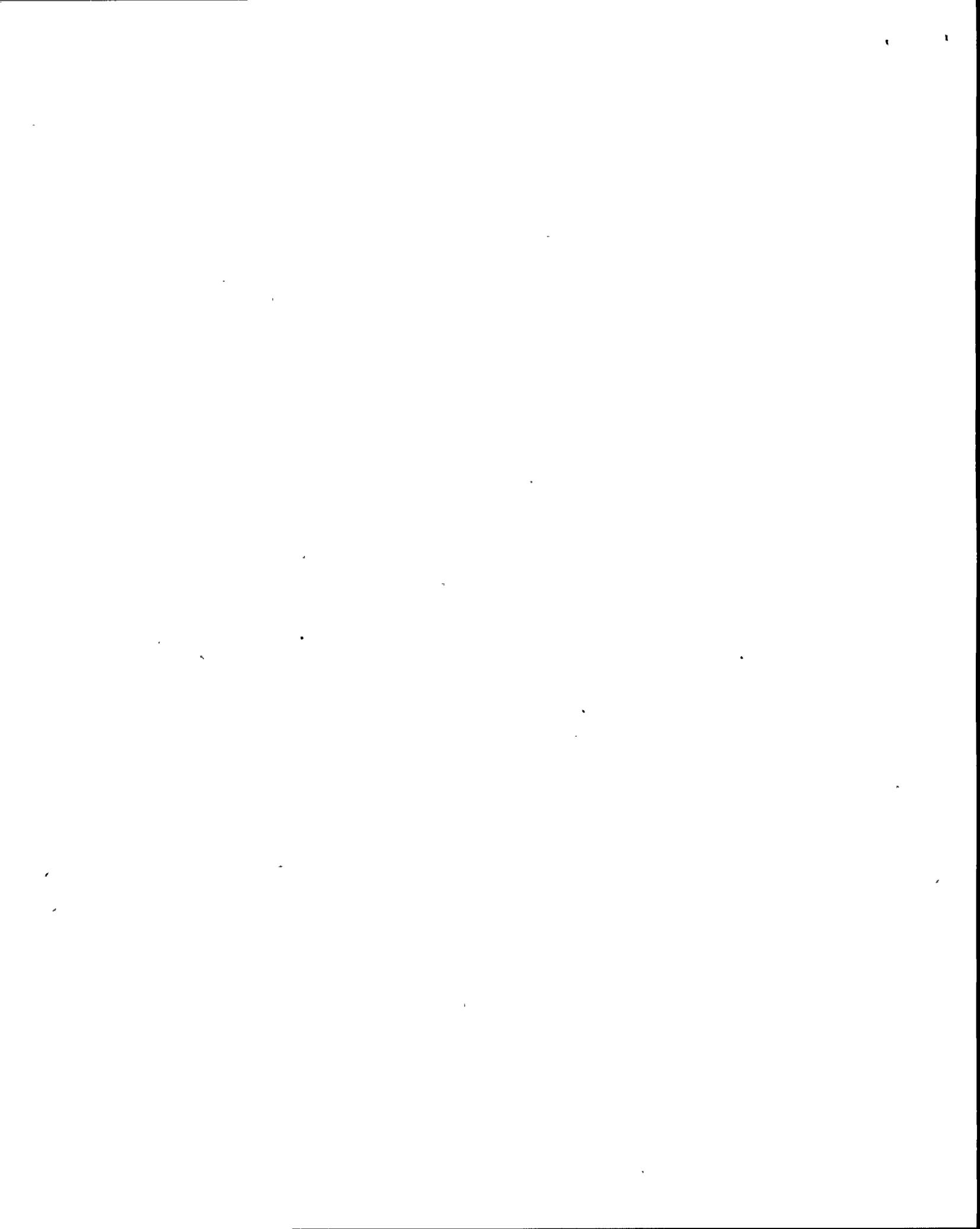
METHODS AND PROCEDURES

Concurrent with the above actions and following the Nuclear Forum in November, I enlisted the aid of two separate classes at Cal Poly to carry out a citizens' survey of nuclear accident preparedness by various private and public agencies. Representatives of the following agencies were contacted and interviewed in person or by telephone

SLO County: Sheriff's Office; Health Officer*;
Hospital; Environmental Health;
Civil Disaster Coordinator.

SLO City: Police Dept.; Fire Dept.; Civil
Defense.

*Note: Agency interviewed only in December, 1975.



Media: KVEC; KSLY; KUNA; KATY; KZOZ**

Health Services: French Hospital; Sierra Vista Hospital; San Luis Ambulance; Five-Cities Ambulance**

Others: PG&E; County Office of Education;* California Highway Patrol**

In each case the interviewer was instructed to "start at the top" with the Department Head or Division Director. The following questions were asked:

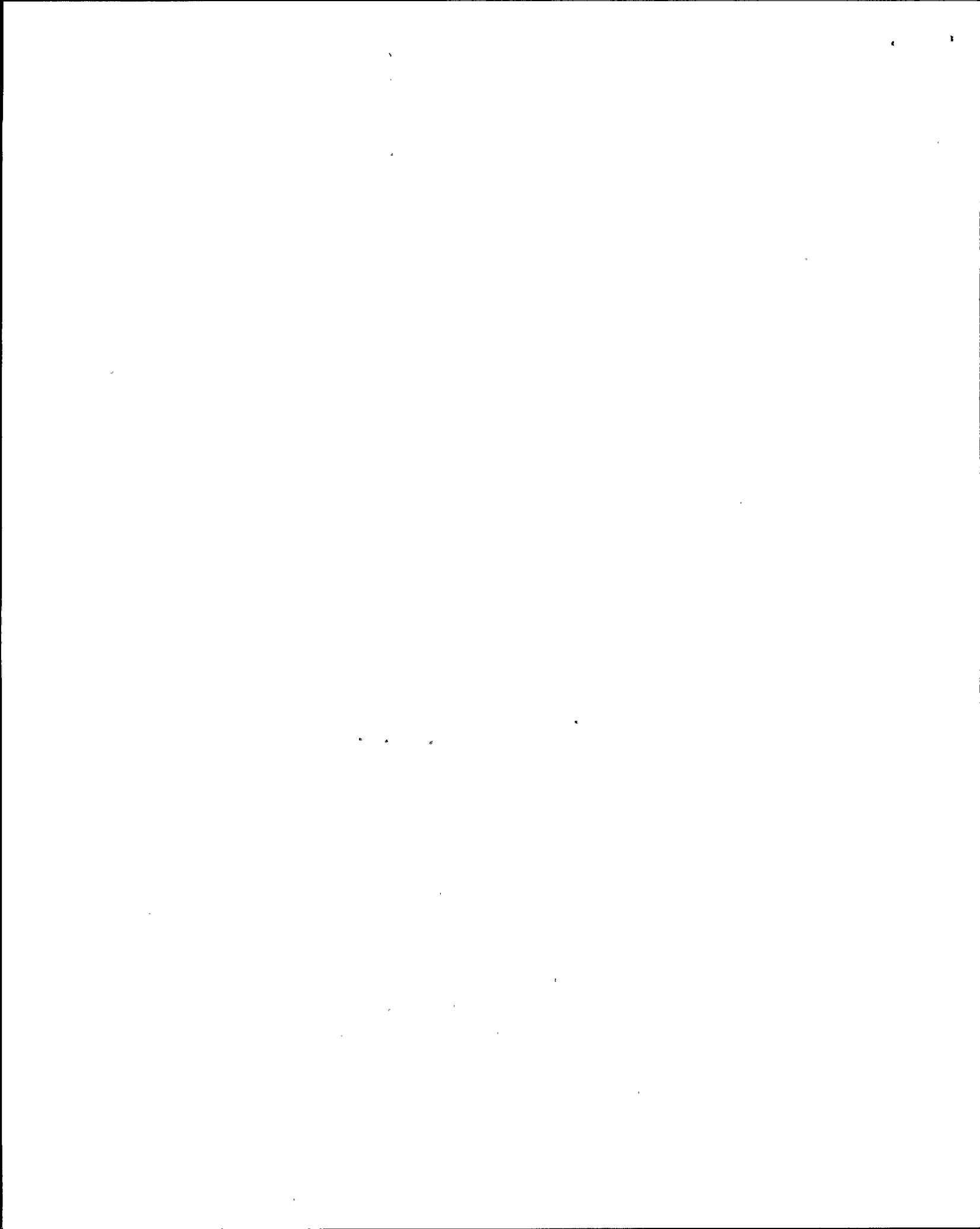
1. In the event of a nuclear accident (on site) (off site), what are your responsibilities:
 - to the County as a whole?
 - to the general public?
 - to your own employees?
 - to the State or Federal Government?
2. Do you have (or are you aware of) a written contingency plan for nuclear accidents (on site) (off site)?
 - When was it written?
 - When was it updated?
 - Have you had mock drills yet? When? Why not?
 - Is your written plan available to a private citizen? How? Where? Why not?
3. To whom do you report in the event of a nuclear accident?
 - Meltdown type (Diablo, on site)?
 - Accidental release of plume (Diablo, off site)?
 - Spent fuel transportation spill (on site) (off site)?
4. What local, state, or federal regulations or guidelines determine your responsibilities in the event of a nuclear emergency?

RESULTS OF THE FIRST SURVEY¹

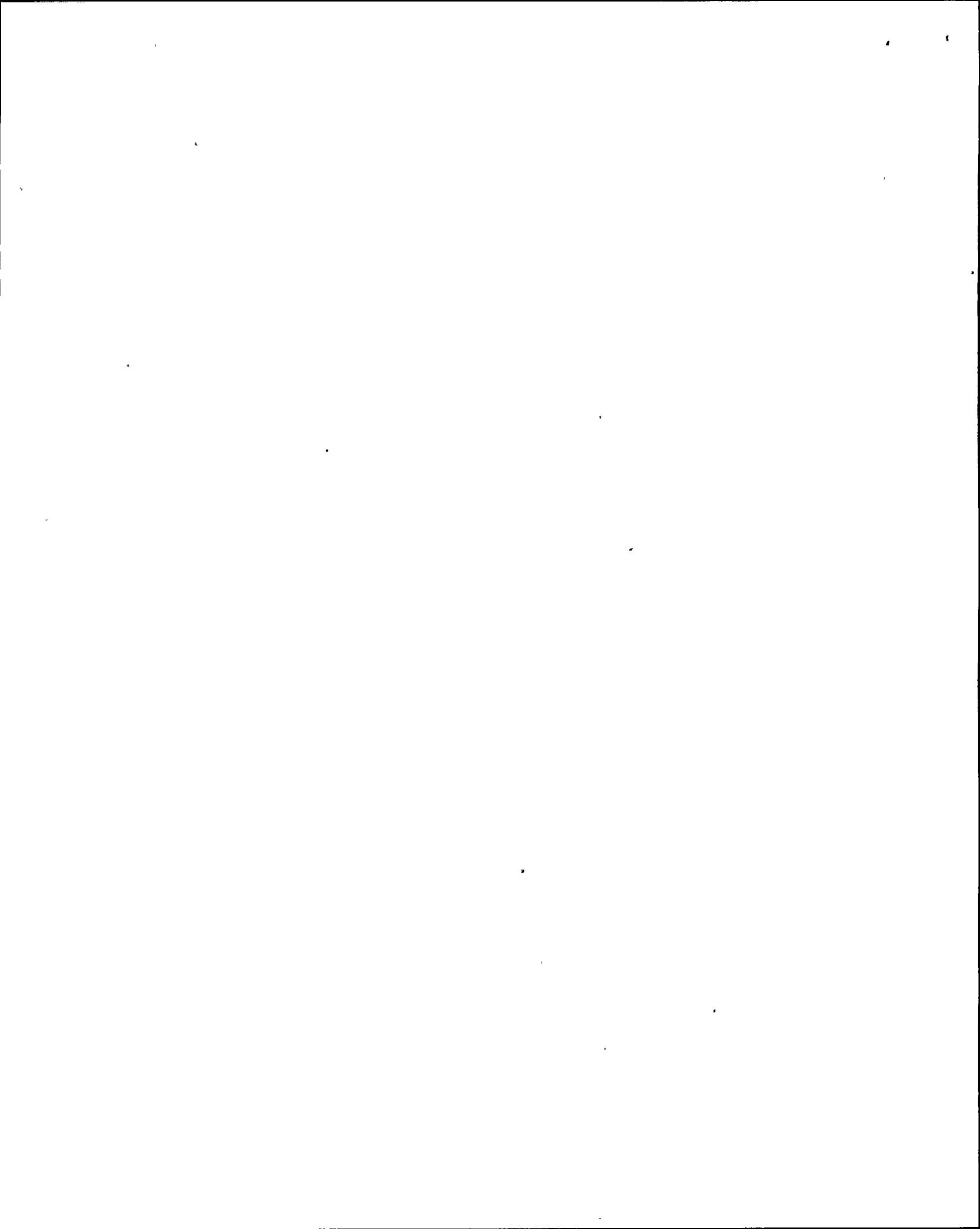
The first survey was taken by eleven students in December, 1975. The following summarizes the most important findings:

1. Few agencies knew of the existence or preparation of a Nuclear Power Plant Emergency Response Plan. Some were aware of general emergency procedures or plans, however outdated or outmoded. These plans are generally not available to the public.

**Note: Agency interviewed only in March, 1976.



2. Some persons interviewed were quite candid, others seemed less so. The level of preparedness of each county, city, or private agency fluctuated with the direct knowledge or awareness of the individual being interviewed. While the interviewers were instructed to "start at the top", in many cases they were referred to an assistant or lower eschelon person. In other instances, the secretary or person who answered the original inquiry routed the question to yet another person, or promised to have someone return the phone call. In some cases, information received thusly from two persons within the same agency was contradictory to, or in conflict with, answers previously given.
3. In general, it can be stated that while police, fire, hospital, and ambulance services are prepared for meeting general emergencies, none of them possess the proper equipment or training required for a nuclear emergency! No agency has yet had a mock drill. Several did not think it necessary to have one "until the Diablo Canyon plant goes into operation."
4. Specific interviews indicated many instances wherein one agency assumed that another agency was performing a specific procedure or carrying out a specific responsibility. Most assume that PG&E or the Federal Government were in charge. For example, local hospital and ambulance personnel simply assumed that doctors would be on the scene and decontamination and/or detection equipment available at Diablo Canyon. When questioned about the availability of medical facilities for contaminated persons, a PG&E spokesman at Diablo Canyon responded "This is not a hospital!!" The survey showed that radioactive isolation wards are simply unavailable in area hospitals at the present time.
5. Equipment is also a matter of concern. Much of the detection and monitoring equipment possessed by various agencies is outmoded or would be inadequate in the event of a nuclear accident. For example, while a direct communication link exists between PG&E and the Sherriffs' Office no such link is present between the Sheriffs' Office and the Courthouse and between the Courthouse and the Primary Emergency Broadcasting System Radio Station.

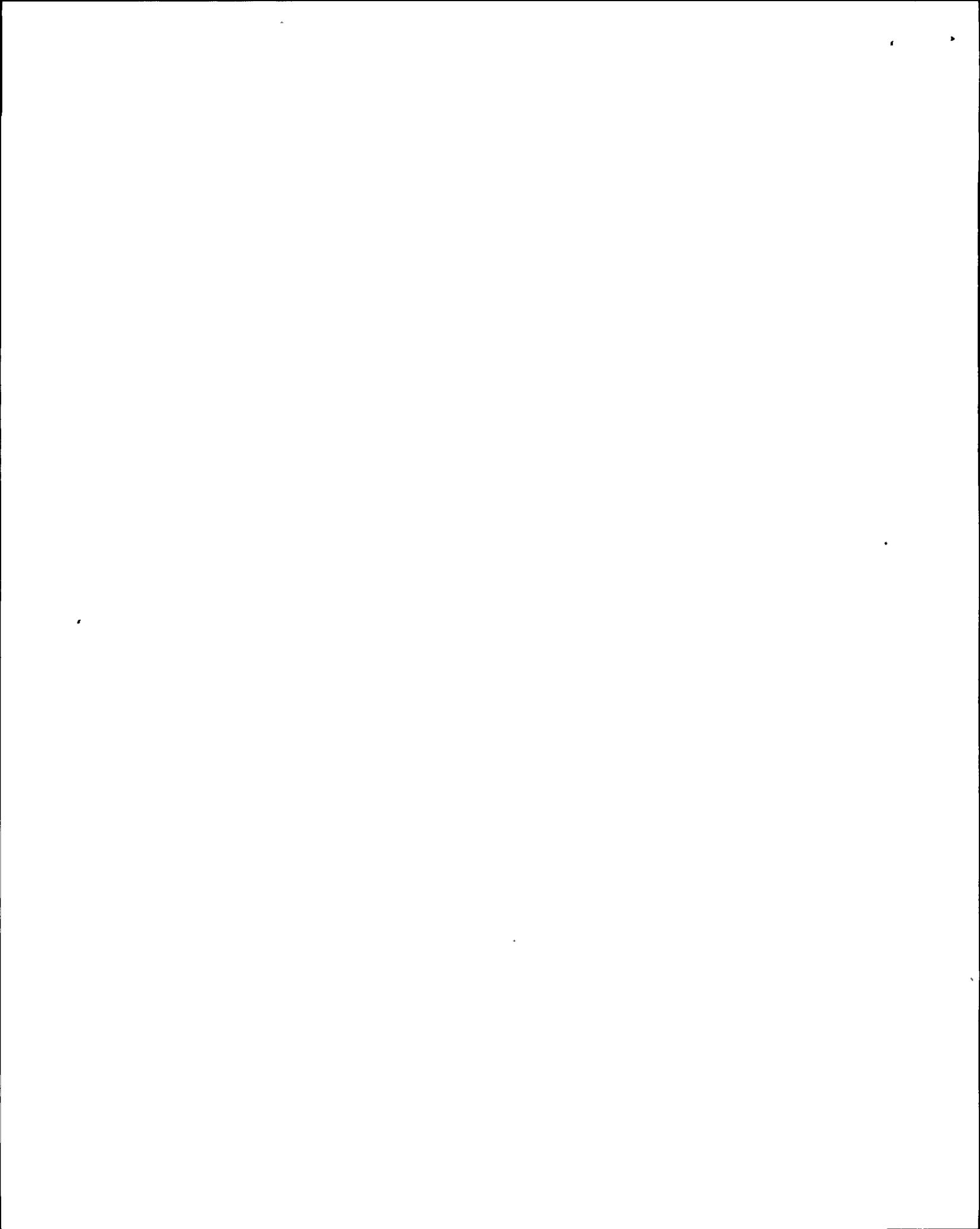


6. Many of the interviews required several phone calls over several days before the interviews could be conducted with the proper person or a call was returned. In one instance the only person who allegedly had any information was on "vacation". This, of itself, speaks to the general lack of preparedness.
7. Of the agencies surveyed, only the Environmental Health Division (which had been working on the Solid Waste Management Plan) and the Sheriffs' Office (which had worked out an evacuation route plan with PG&E) can be given reasonably high marks, for awareness of their responsibilities. PG&E is well aware of its role at the Diablo Canyon site but its responsibility is confined to the area within the plant gates. PG&E's responsibility to the County as a whole ends when they notify the Sheriff. Even in the event of a nuclear meltdown or release of a radioactive plume off-site, PG&E's responsibility would be discharged once it notified the Nuclear Regulatory Commission and the Sheriffs' Office.

RESULTS OF THE SECOND SURVEY¹

The second survey was conducted by another class of twelve students in March, 1976. The students on this follow up survey team were not aware of the results of the first survey or of the questions asked. They were, however, given identical instructions and questions. In all cases they were assigned to contact the same persons as were interviewed in the December survey, but in most cases they ended up speaking to a different person.

Responses to the second survey essentially mirrored those of the first. Agencies were now aware that some kind of nuclear accident plan was being prepared but several interviewees seemed annoyed by their lack of specific knowledge of the plan. At least they knew that the County rather than just PG&E was somehow involved!

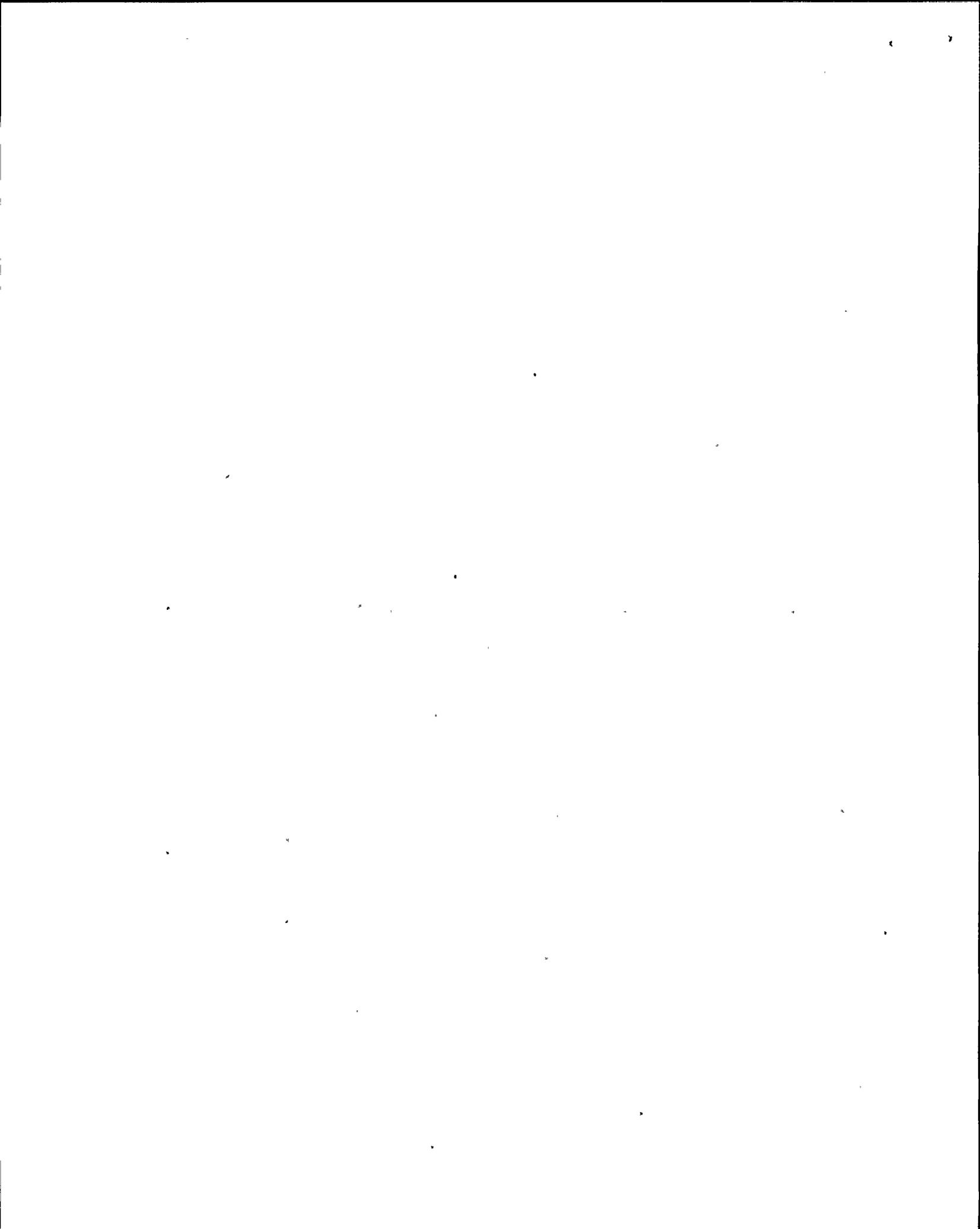


CONCLUSION: Students in both survey classes were unanimous in their evaluation that most San Luis Obispo County public and private agencies are not prepared or sufficiently trained to handle a nuclear emergency should one occur at this time or within the immediate future.

Theoretically, the agencies contacted had had three more months of planning involvement on the nuclear emergency response plan and the spur of the original interview in December to make them aware. While the awareness level rose between December and March, the level of preparedness did not.

It is important that local Government and private agencies be appraised of the current state of emergency preparedness and precautionary steps be taken to protect the health and safety of the people of San Luis Obispo County in so far as possible before nuclear operations begin at Diablo Canyon.

Note: 1. Original student interview reports for each agency available on request.



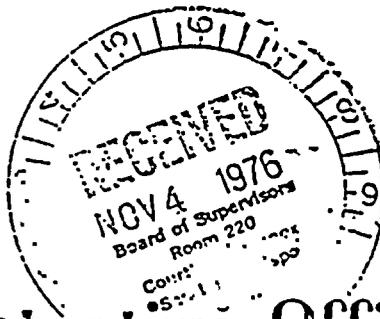
JAMES O SHARP
ASSISTANT ADMINISTRATIVE OFFICER - OPERATIONS

JERRY W HAUGHEY
ASSISTANT ADMINISTRATIVE OFFICER - PERSONNEL

A LEE GILBERT
SUPERVISOR OF TELEPHONE SERVICES

BARBARA W CARLSON
DEPUTY EXECUTIVE OFFICER - LAW

RUSSELL R POWELL
SUPERVISOR OF PUBLIC UTILITIES



County Administrative Office

COUNTY OF SAN LUIS OBISPO • ROOM 217, COURTHOUSE ANNEX • SAN LUIS OBISPO, CALIFORNIA 93401 • AC/805 543-1550

WILLIARD V. WAGGONER
COUNTY ADMINISTRATIVE OFFICER

November 4, 1976

OPENING STATEMENT

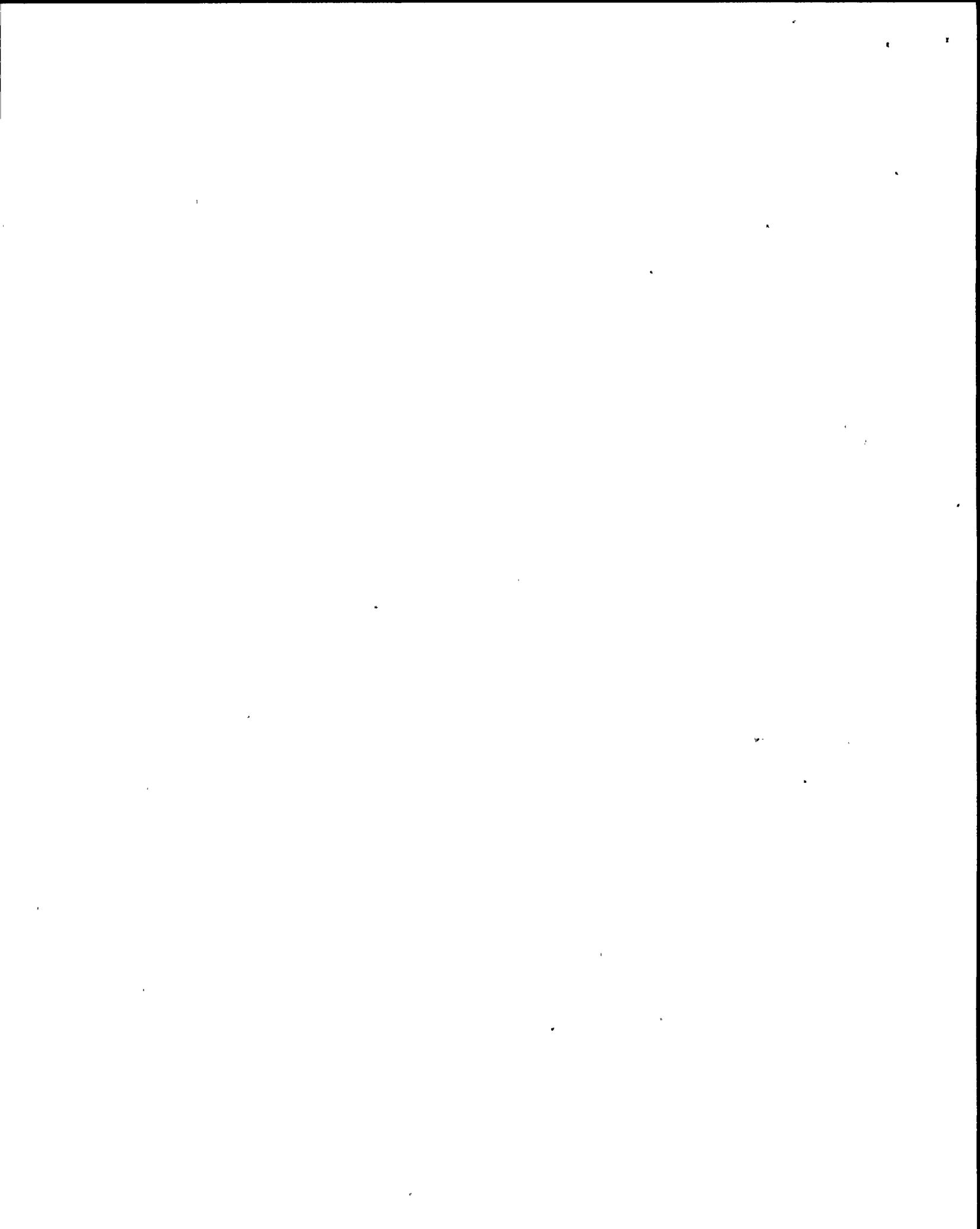
SAN LUIS OBISPO COUNTY OFFICE OF EMERGENCY SERVICES

We would like to thank this committee of the State Energy Commission for inviting us to testify today in reference to nuclear emergency planning in San Luis Obispo County.

The County Office of Emergency Services has the responsibility for developing and coordinating emergency procedures in this County under the guidance of the County Disaster Council. These procedures are implemented when a Local Emergency is declared by the Board of Supervisors or the Director of Emergency Services, in their absence, as a consequence of a disaster affecting the unincorporated areas of this County. The office includes the Director who is the County Administrative Officer and the Civil Disaster Coordinator.

According to a recent estimate given the County by a representative of the Pacific Gas and Electric Company Unit No. 1 of the Diablo Canyon Power Plant could be in operation as early as April 1977. As a consequence, County government has selected March 31 as a target date for the completion of the basic emergency response procedures for those agencies in the County having emergency responsibilities in the event of a nuclear incident at the Diablo Canyon Power Plant.

Exhibit J

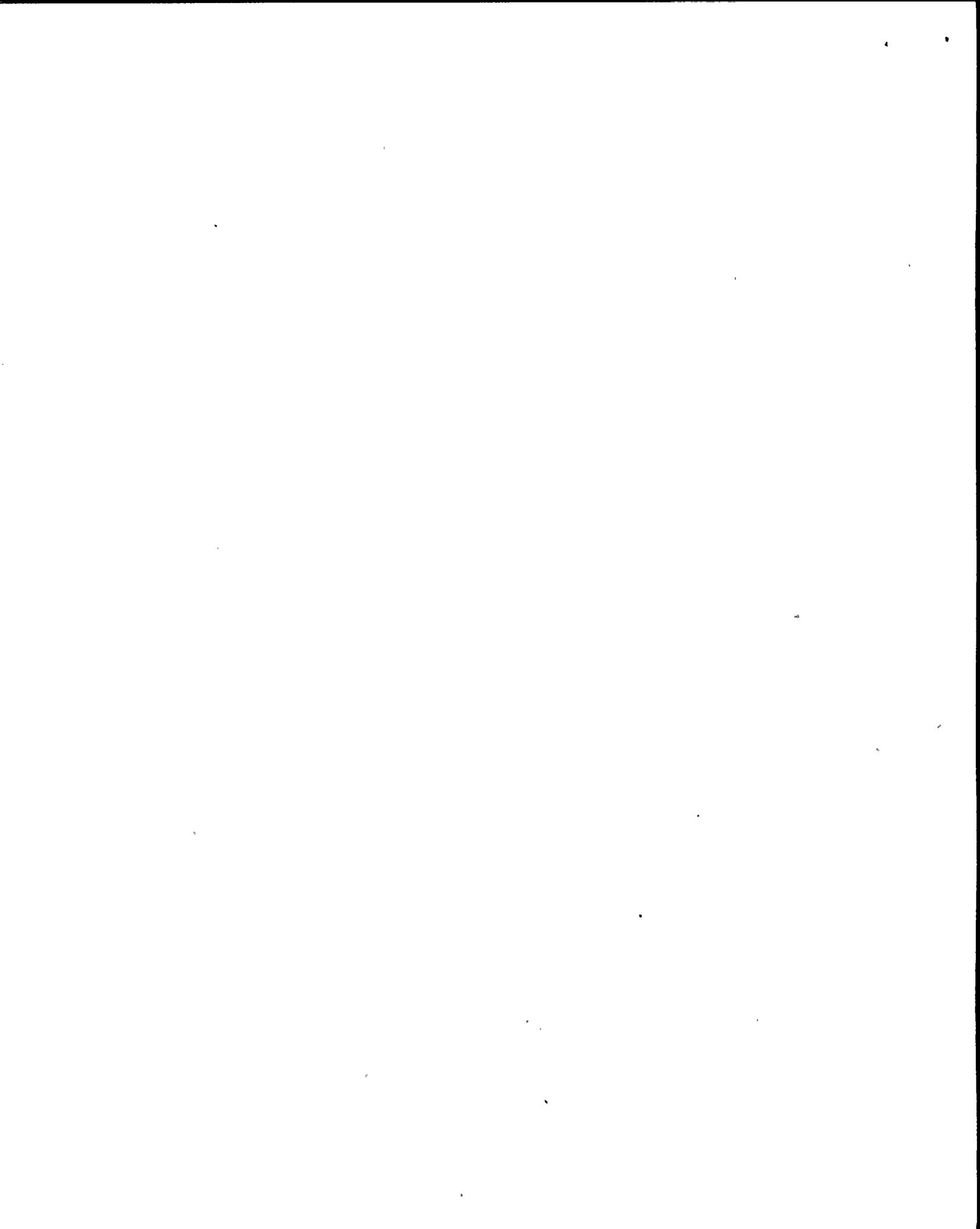


The fundamental and overriding purpose of the Nuclear Emergency Response and Evacuation elements of our Emergency Plan is to provide for the public safety in the event of a radiological emergency in the unincorporated areas of San Luis Obispo County.

The Nuclear Emergency Response and Evacuation elements are based on the same statutory authorities and organization as described in the basic County Emergency Plan. That document prescribes that the Board of Supervisors or the Director of Emergency Services, in their absence, has the authority to proclaim a LOCAL EMERGENCY in those cases where it appears that a situation of substantial peril to public safety exists in the community which may exhaust local resources in the response. When a LOCAL EMERGENCY is proclaimed, the Emergency Director Group is responsible for the overall direction of the County Emergency Organization. This group is made up of the Chairman of the Board of Supervisors, the Director of Emergency Services with staff, and the heads of each of the six principal emergency response agencies: Medical Health, Law Enforcement, Fire, Traffic Control, Shelter/Welfare and Engineering.

In developing the Nuclear Emergency Response and Evacuation elements to the County Emergency Plan, this office attempted to keep uppermost in mind the nature of the potential hazard as it might impact on the threatened populations of our County. That hazard consists of airborne radionuclides, including halogens, and the subsequent potential problem of deposited radioactive material which could become a danger as a result of chronic exposure, inhalation or ingestion by individuals. As a consequence, we did not include a variety of detailed accident sequences as they might relate to the reactor.

On August 24, 1976, the Board of Supervisors directed the County Administrative Officer to expedite the completion of the County's Nuclear Power Plant Emergency Response and Evacuation Plans. The C.A.O. subsequently assigned three members of his staff to assist the Disaster Coordinator to accomplish the task. The completed drafts of these two elements were presented to the Board of Supervisors on October 25. At

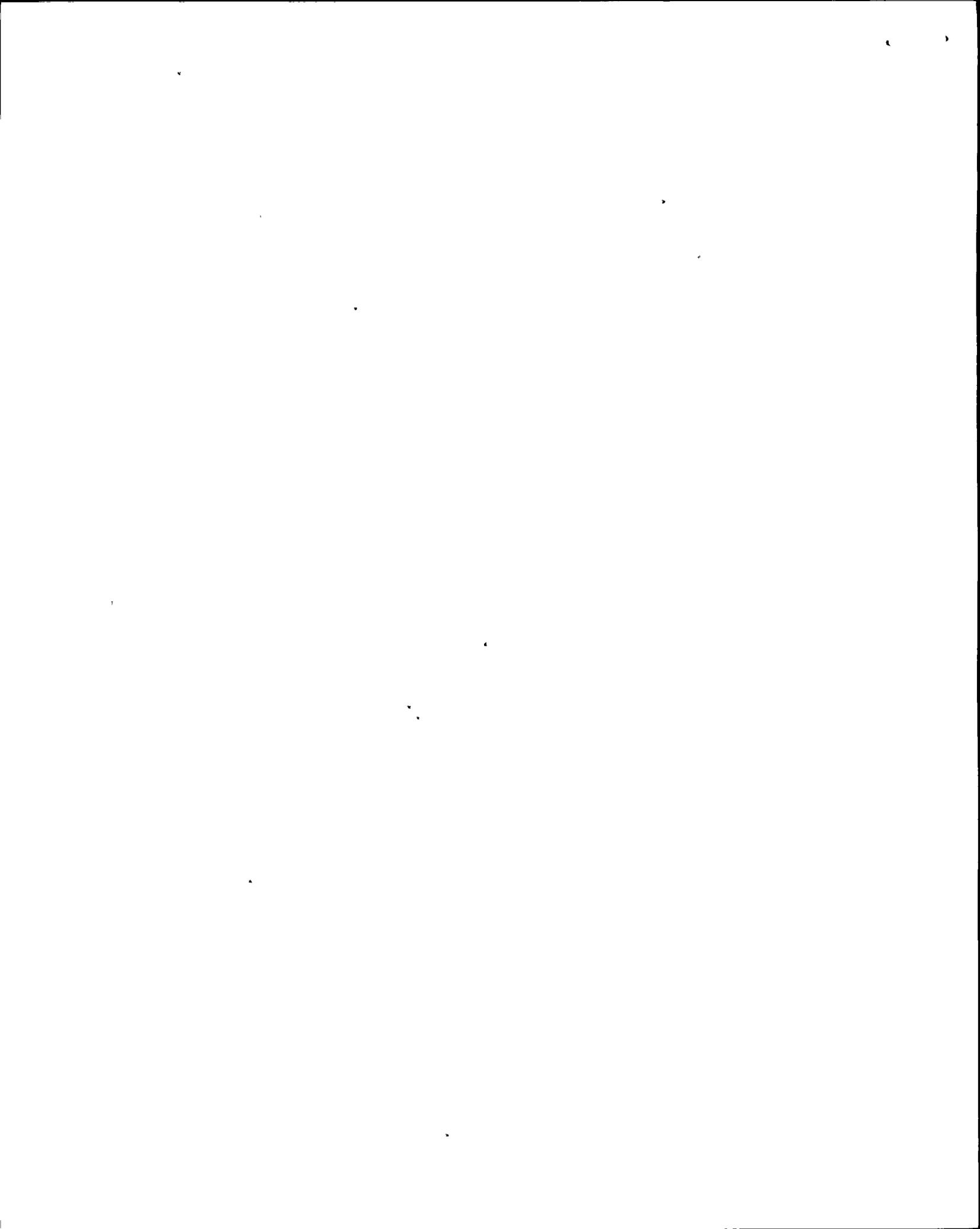


that time, the Board scheduled public hearing on these plan elements to be held on December 2, 1976.

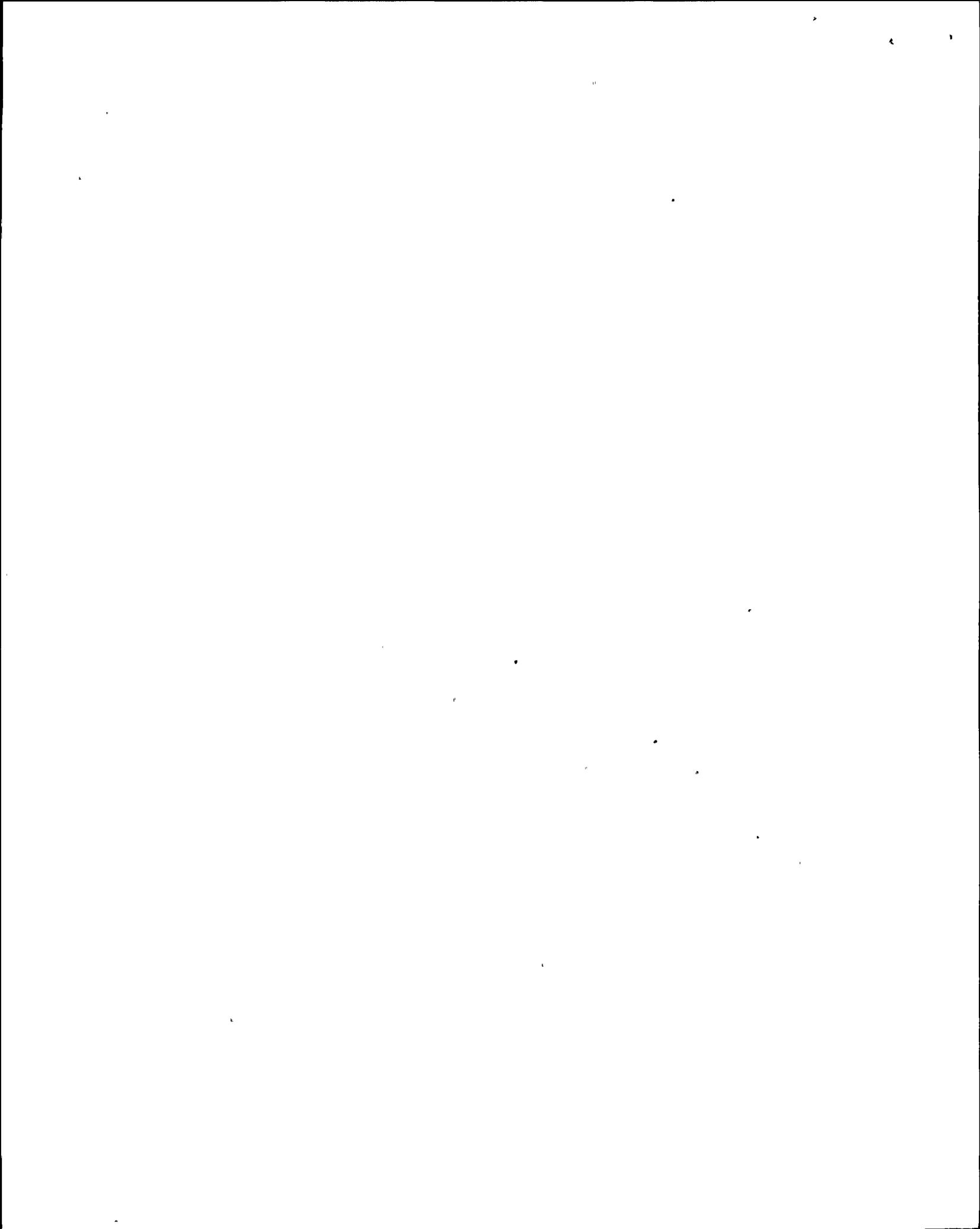
In the development of the Response and Evacuation elements, staff used as reference material the California Nuclear Power Plant Emergency Response Plan, the Nuclear Regulatory Commission NUREG 75/111, the Environmental Protection Agency's Manual of Protective Action Guides and Appendix VI of the Reactor Safety Study (Rasmussen), "Calculation of Reactor Accident Consequences."

The Nuclear Power Plant Response and Evacuation elements of the County Emergency Plan address the authorities, organization, procedures and resources that would apply in the event of a serious radiological emergency threatening this County. It must be recognized that these documents in themselves do not represent a comprehensive emergency response system. On November 1, 1976, the Board of Supervisors approved augmentation funding for disaster planning in order to make possible the development of the necessary implementation procedures. These include:

1. Coordinating the County nuclear emergency procedures with those of each of the six incorporated cities.
2. Coordinating procedures with school districts, hospitals, etc.
3. Assisting individual County departments in refining their procedures.
4. Conducting radiological training for those individuals tasked with radiological monitoring responsibilities.
5. Developing emergency information and instruction for the public.
6. Determining special equipment requirements.
7. Developing and conducting a County exercise to test the effectiveness of the plans.



This office feels that the hearing being conducted by your committee today will serve a useful purpose for our jurisdiction insofar as it explores in a constructive manner, those essential elements to be considered in the development of a comprehensive system capable of responding effectively to a radiological hazard of an accident at a nuclear power plant.



BOARD OF SUPERVISORS

COURTHOUSE ANNEX / SAN LUIS OBISPO, CALIFORNIA 93401 / 805-543-1550, EXT. 321



Testimony for Nuclear Response Plan

Dr. Richard J. Krejsa
December 1, 1976/December 21, 1976

Members of the Board
HANS HEILMANN
M. E. WILLEFORD
KURT P. KUPPER
HOWARD MANKINS
DR. RICHARD J. KREJSA

General Comments:

Given the time frame in which this document was pieced together, the staff did a remarkable job of gathering information. Not all the necessary information was gathered, however, and the plan, as it now stands, is inherently unworkable.

I think you ought to modify the format slightly starting with an introductory statement of Situation followed by a statement of Goals and Objectives, next Activation and then Authorities. As your second chapter, you could have "Types of Accidents" you are planning for. Authorities, now given first, are not as important as the Situation and Goals.

Page 1 The document should be examined in light of its stated purpose(s) given on page 1. Those "purposes", however, are really objectives which hopefully will be achieved. The real "purpose" (or goal) is hidden away on top of page 4, i.e., "to provide for evaluation of and response to a postulated incident (accident) at the Diablo Canyon Nuclear Generating Plant."

Unfortunately, nowhere in this document is there a mechanism or guideline for "evaluation of...a postulated incident", and the document does not yet clearly detail what the necessary "response to a postulated incident" might fully entail.

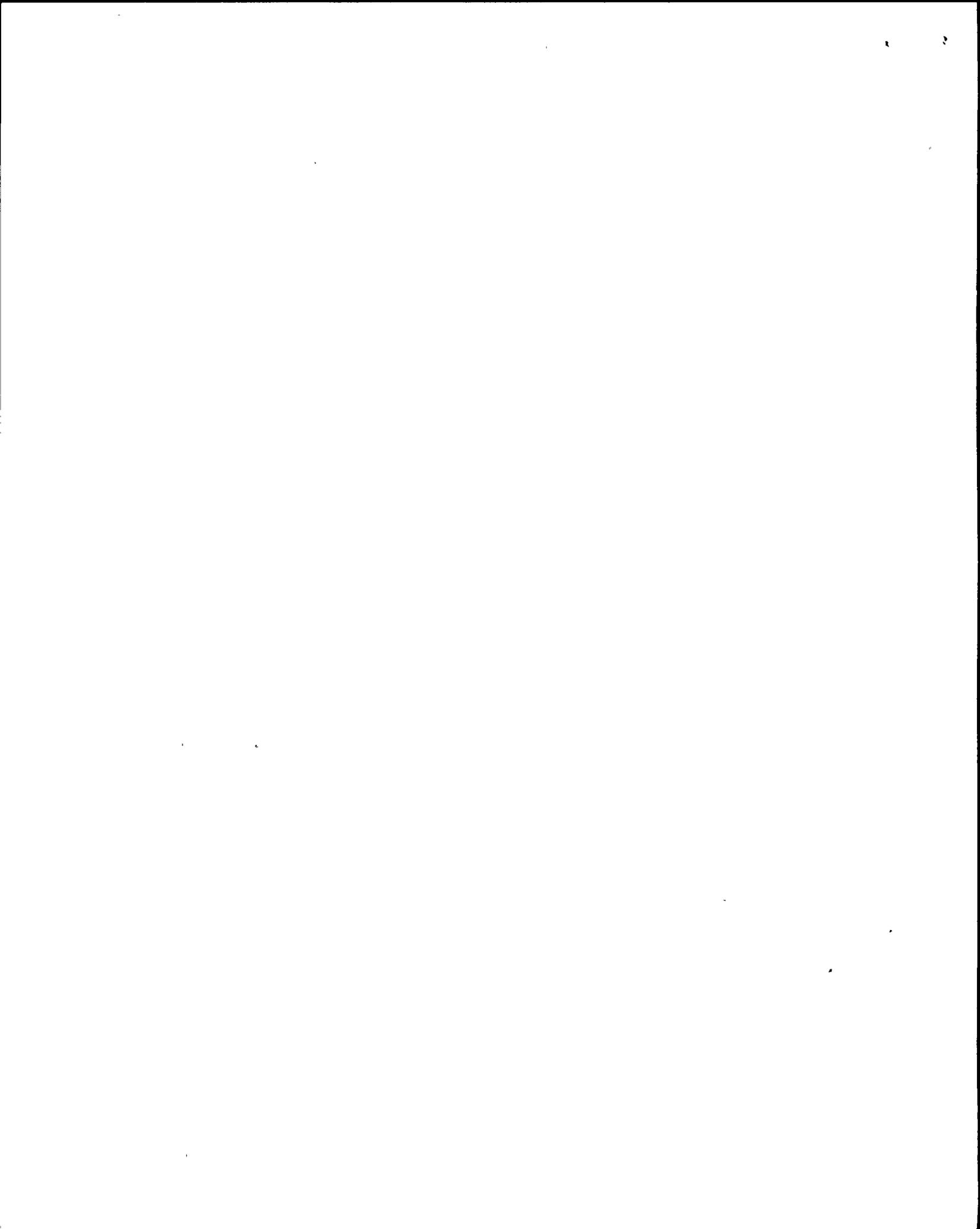
The purposes (more properly objectives) listed on page 1 seem to imply City involvement but yet no such involvement is assumed by the plan, i.e.:

1. a. "to establish organizational responsibilities...in the event of..."

Q: Does this mean County of San Luis Obispo organization only?

b. "to minimize radiation exposure and environmental contamination".

Exhibit K



7.6: 11-01 2/2000

CAPITOL ADDRESS
STATE CAPITOL
SACRAMENTO 95814
445-5843

DISTRICT OFFICES
P.O. Box 1188
WATSONVILLE 95078

1155 MARSH STREET
SAN LUIS OBISPO 93401

COMMITTEES

EDUCATION
FINANCE, Vice Chairman
JUDICIARY
GOVERNMENTAL ORGANIZATION

JOINT LEGISLATIVE BUDGET
COMMITTEE, Chairman
JOINT LEGISLATIVE COMMITTEE
FOR REVISION OF PENAL CODE
JOINT LEGISLATIVE COMMITTEE
ON LEGISLATIVE ETHICS

California State Senate

DONALD L. GRUNSKY

SENATOR
SANTA CRUZ, SAN BENITO, MONTEREY AND
SAN LUIS OBISPO COUNTIES

July 21, 1976

Dr. Richard J. Krejsa
Vice Chairman and
Supervisor, 5th District
San Luis Obispo County
Courthouse Annex
San Luis Obispo, California 93401

Dear Dick:

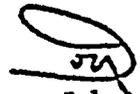
This is simply to acknowledge receipt of your letter and enclosed copy of a report you presented to the Board of Supervisors on the preparedness of the County to react to a nuclear disaster.

I appreciate hearing from you and found your enclosed report most interesting and informative.

I hope you will continue to keep me informed of further developments at the local level.

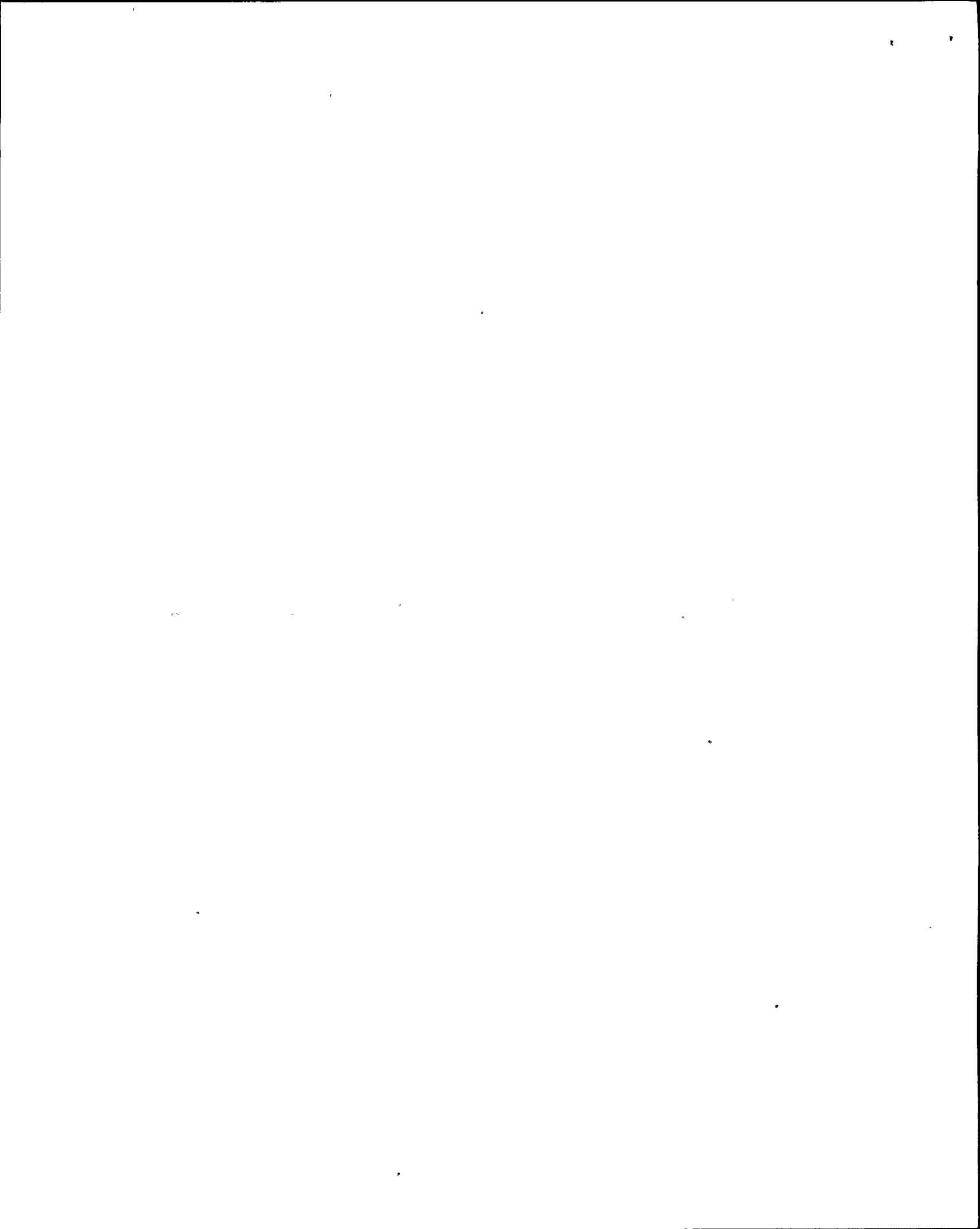
Kindest regards.

Sincerely,



Donald L. Grunsky

DLG:bdb



Q: Is exposure accepted as a given? In what amounts? Who is taking the precaution to prevent exposure?

2. "Establish a mutual understanding...of civil government..."

Q: Within County civil government only?

3. "Incorporating...non-governmental agencies and organizations" into the County emergency organization.

Q: Doesn't this assume that (all) governmental agencies are already incorporated into the County emergency organization? (see also A1-7)

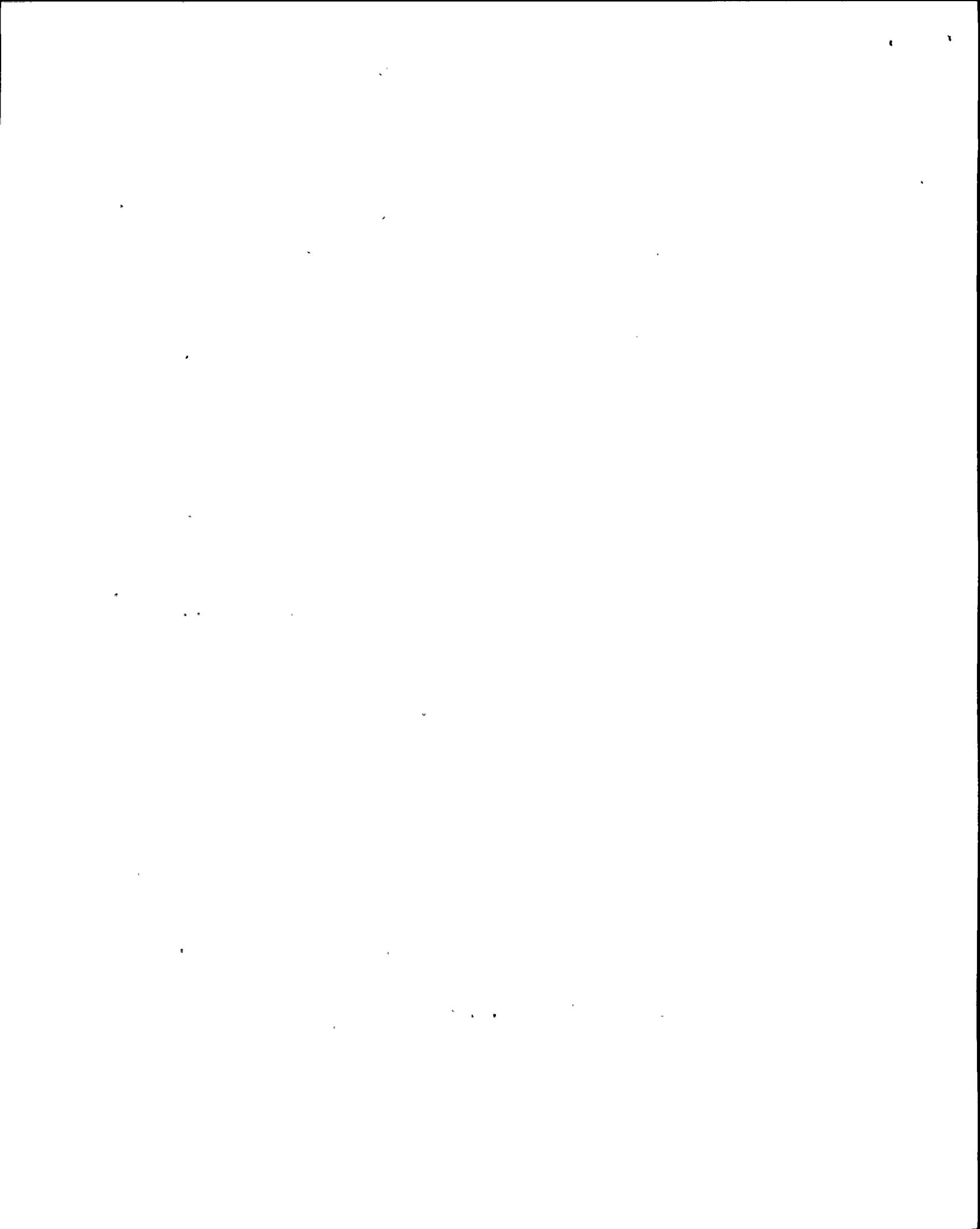
Page 2

You speak of a "Class C or D radiological accident" before such accidents are even defined (on page 5).

You refer to a "radiological accident" here, and also in the Table of Contents you list "Types of Accidents..." page 4". Yet, on page 4, you list: "Types of Incidents".

There is a continual inconsistency in usage of the term "accident" and "incident", with almost exclusive use of the word "incident" where "accident" is meant. "Accident" is used in the Table of Contents, on page 2, and again on page 18 and A4-1. Incident, on the other hand, is used (incorrectly) on: pp. 1,3,4,5,6,7,8,9,11,12,17,18 (on either side of the paragraph bearing the word accident), 19,24; and in the appendices; A1-1, A2-1, A3-1, A4-2, A4-7, A5-1, B1-1, B9. Nowhere in the text or the glossary are the terms defined. An "incident", according to Webster's, is an event "which happens aside from the main design". That is, something not designed or planned for, not premeditated, it has a neutral emotional value. An "accident", on the other hand, is an unusual effect of a known cause and therefore not expected. Accidents connote negative emotional value. They are, in a sense, premeditated incidents.

Since the Diablo Canyon Reactors have been planned for and designed to withstand all manner of imaginable events, i.e., earthquakes, meltdowns, etc., the failure of the hardware to handle an emergency for which it was designed, must be considered an "accident" not an "incident". Example: on page 3 it states, "The principle deterrent to an incident is prevention through correct design, construction, etc." and again on page 4 "and response to a postulated incident". Correct design may prevent an accident, but it cannot prevent an incident, i.e., an event which is not planned for



or designed to. Furthermore, you can only postulate accidents, not incidents.

Page 3

The near exclusive use of the neutral word "incident" in this document unconsciously mirrors the use of neutral words in P.G. & E.'s public literature which states, quite matter-of-factly, that:

- 1) "radioactive gases...(are)...removed in the purification process;
- 2) "The radioactive gases in waste gas streams...are released to the atmosphere on a controlled basis..."; and
- 3) "The radiation exposures from nuclear power plant operation result in very small additional public radiation exposures...They are almost immeasurably low in relation to the radiation that exists naturally in our environment."

I am pleased, therefore, that on page 3, the word "hazard" is used in relation to the "highly radioactive by-products" released in a "nuclear generating plant incident". To my knowledge, it is the first time in this County that an official public document mentions the word in relation to the Diablo Canyon facility. I hope it doesn't get stricken from the document.

Page 4

1st paragraph, 2nd sentence. This sentence is redundant if you state the goal clearly. However, since it mentions "evacuation of persons", it should be cross referenced to "Evacuation Plan".

Under Class B Accidents. It should be noted that plans are now underway for minor medical treatment of from 0 to 5 persons in an on-site release. (Dr. G. Main, Oct. 21, 1976)

Page 5

Under Class D, the "populated zone...downwind from the plant" is listed but not defined. How does this compare with the LPZ?

Page 7

Hazards and Exposure Criteria

Title should probably be in capital letters.

Under a. "Whole Body Exposure"

Q: What good are the California Admin. Code permissible limits in the event of an emergency?

Q: What "practicable measures will be taken to limit the whole body exposure dose" in the event of an emergency?

Page 8

Same Question: What "practical measures" will be taken to limit the projected thyroid dose to any individual?

"Practicable" and/or "practical" or "possible" measures are not defined anywhere in the document.

Regarding large doses of iodine 131 in the thyroid, it states "Consequently, a post emergency medical program of surveillance and treatment must be established and continued after an incident."

Q: Who pays for this? P.G. & E.? County? State? Feds?

Emergency Workers:

Public employees and others in disaster organizations (disaster service workers) and "any person required to mitigate the effects of an incident" are "emergency workers" and "it is possible that emergency workers who are involved may be exposed to radiation and contaminated while carrying out their duties." (also see page 14: "persons impressed into service"). Do all County employees know that they are disaster service workers?

Q: How will such persons be trained and by whom? How and by whom will such workers be compensated for radiation injury or cancer? What insurance liability for County?

Q: Will such persons be allowed to refuse to serve as an emergency worker when asked? If so, what contingency exists for the rest of the plan?

Page 9
(2)

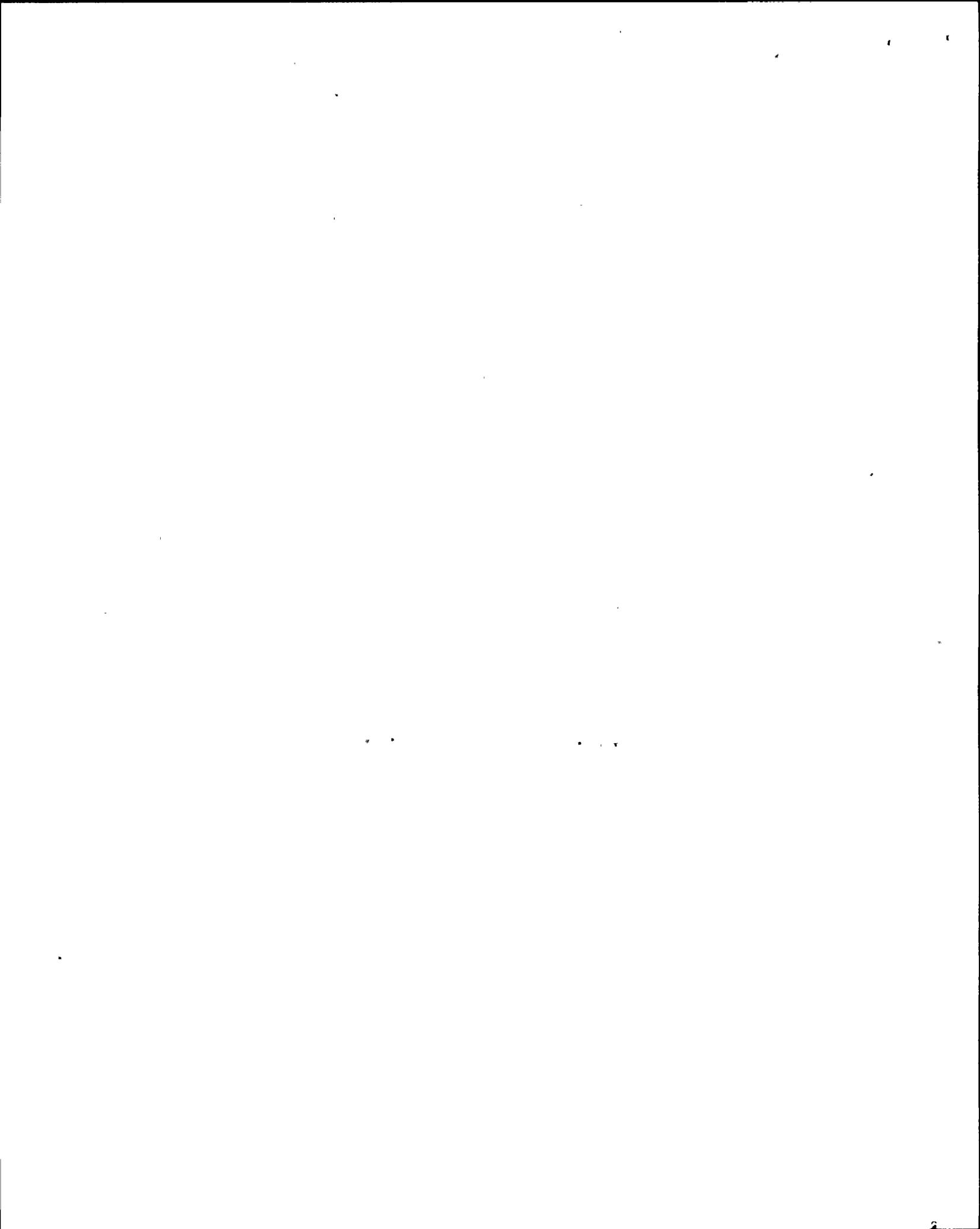
Rescue personnel should be broadly familiar with the consequences of exposure.

Q: How does this apply to persons "impressed into service" a la page 14?

(7)

"....in the extreme case, complete thyroid loss might be an acceptable penalty for a life saved."

Q: How save the "life" of a completely dosed patient?



Page 10
(1)

"Persons receiving such an exposure should avoid procreation for a period up to a few months."

Q: Source? May be forever?

Regarding "Extraordinary Emergency Operations."

Q: Who measures these additional extraordinary doses?

Page 11

"Planning" Preparation is a "joint cooperative effort of... local, state and federal governments..."

Q: Does "local" here mean "County only" or "County and City", i.e., refer to notes on page 1.

"Each organization defines its role, prepares plans, etc."

Q: Who ensures that this is done? Who pays?

"Plans and agreements are coordinated in advance."

Q: By whom? When?

"Local monitoring teams are activated and commence operations when radiation released is escaping past the generating station site boundary..."

Q: How are these teams activated? Who is a member? Who pays for their training? Who pays for their equipment? How much will this training and equipment cost?

Page 12

"Off-site direction rests with local government."

Letter from Lee V. Gossick is contrary!

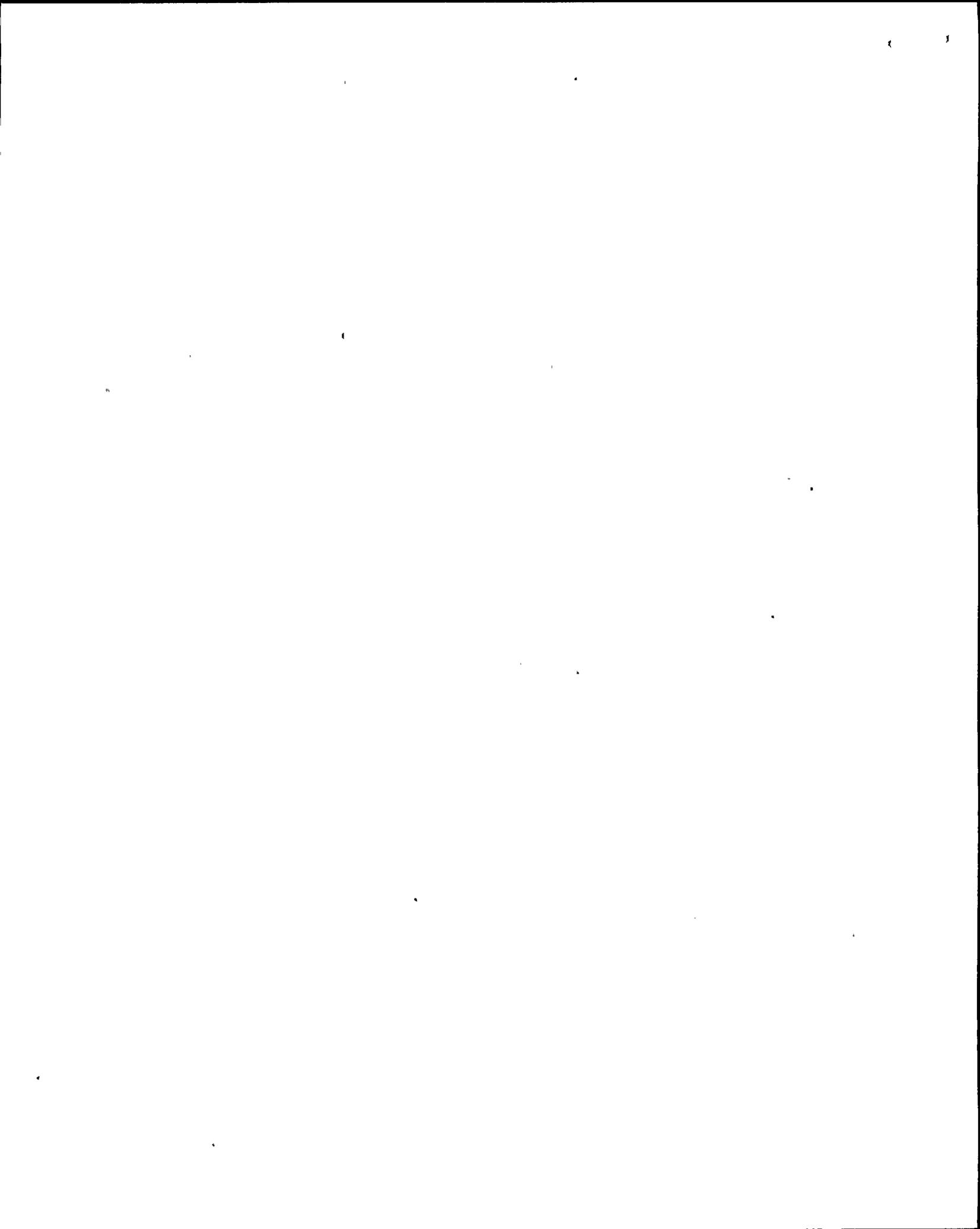
"local government warns the people."

Q: Which local government? City or County? How?

Page 13

The decision to evacuate "is expected to be an early major decision".

Q: Who makes it? CAO; OES Director; Chairman of the Board of Supervisors? On what basis? In what time frame? (see page 21)



"If time permits, the decision should be based on...
doses determined by off-site radiation monitoring"...
"...surface monitoring teams, aerial monitoring teams and
evacuation support teams are dispatched to assigned areas.."

Q: Who does this? With what equipment? What training? Who pays? Dispatched from where? (also see page 19)

"B/S may declare a local emergency."

Q: Has anyone drafted a Resolution of Declaration of Local Emergency for Board of Supervisors - just in case?

Page 14

"Persons impressed into service".

Q: What insurance liability and coverage does County bear for such individuals or any employees?

"All public employees...are disaster service workers".

Q: Will we be asked to negotiate hazard pay for all employees? Is not the risk involved as great or as lethal as facing the gun of a criminal being pursued by a Sheriff's deputy? How will we handle that situation when we can't even legally handle one deputy wounded in the line of duty?

Organizational Structure based on:

"Clear lines of authority and channels of communications."

Q: Are there "clear lines" in this plan between County and cities?

Pages
15-16

"Consolidation under a single chief."

Indicates no tie-in with city response plans!
Especially City Engineers and road crews.

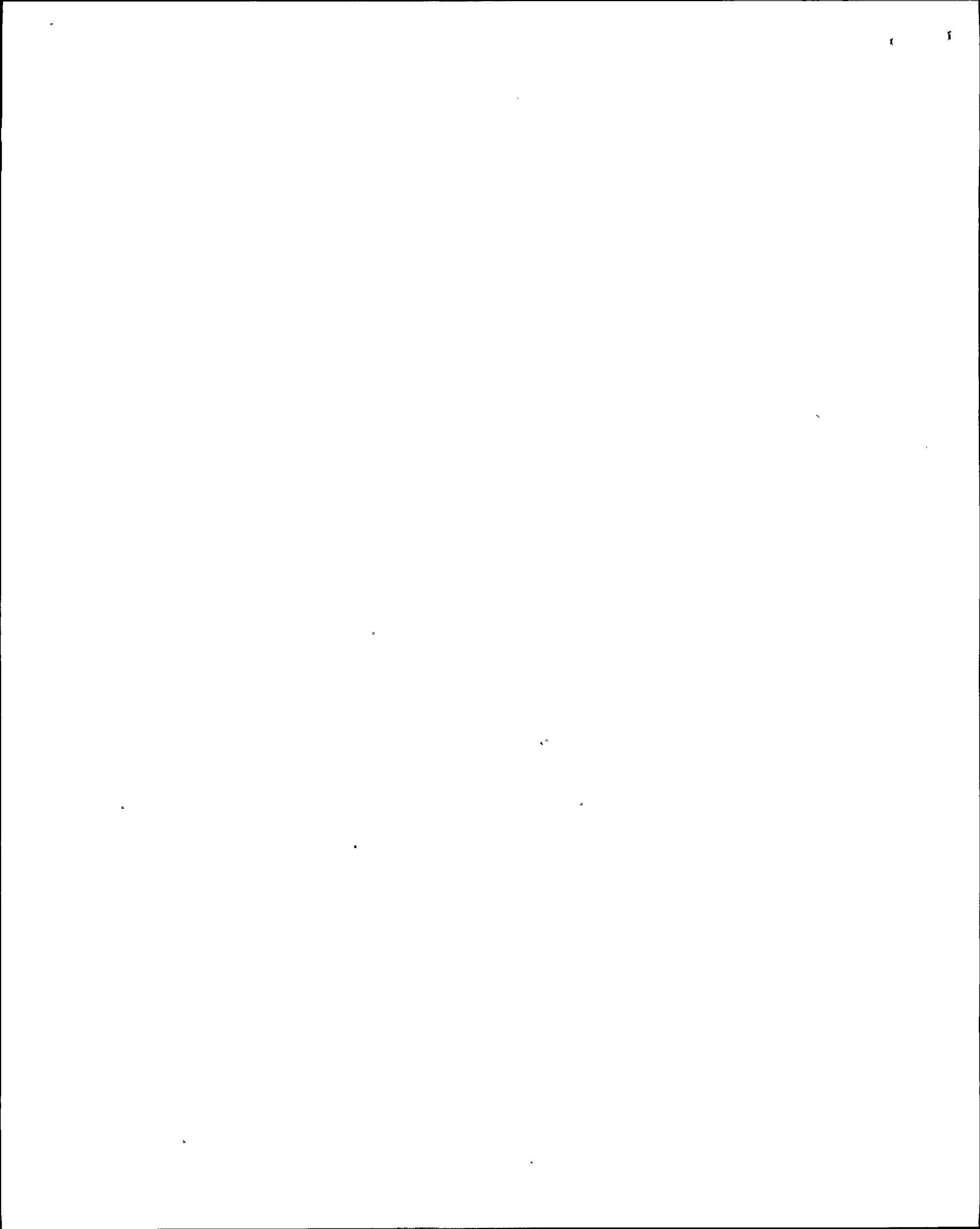
Page 17

"State and County Agencies and Departments...will provide SOP's..."

Q: What about Cities?

"State OES...will review and approve local plans and SOP's."

Q: Who will coordinate?



"The operator...has developed and will implement plans for on-site actions to cope with on-site and off-site releases..."

Q: Can you document and detail their plans for "coping with off-site releases of radioactivity"?

Page 18 : Alerting

"Alert information shall provide...sufficient information..."

Q: By whom? In what format? Who will interpret? who will assess? The magnitude, nature and consequences?

"Upon verification of the notice, the S.O. will notify the County Director of Emergency Services...(543-1074)

Q: What happens at night? After 5 p.m.? County Health Agency phone number 543-1200 is daytime number. As are County Engineer and Social Services.

Page 19 "Two basic techniques of radiological monitoring will be employed..."

Q: Who trains? Who pays?

Page 20 "Resources will be made available upon request..."

Q: Are the necessary agreements signed? (see page 24)

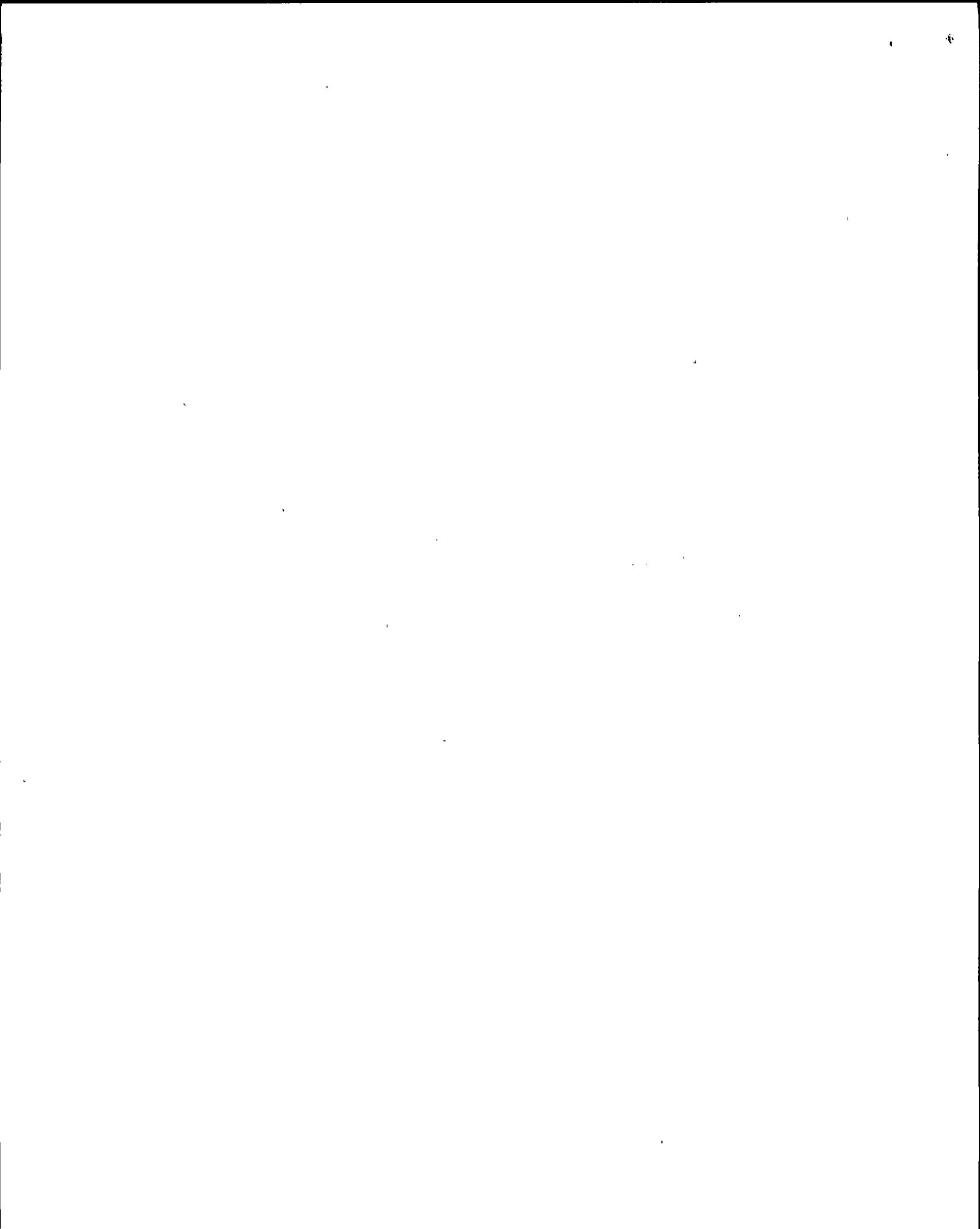
Page 21 "The decision will be based on an evaluation of actual and predicted radiological and meteorological conditions."

Q: How can the citizenry be certain that the decision will be made on time or be made at all?

Page 22 Regarding evacuation procedures.

Q: How will you "provide for alert, warning, and notification...for persons located in a potential evacuation area", especially if they have no radio?

Q: In considering the "special needs" of school children, etc., you ought to consider the needs of those (poor) people who have no transportation. Will you provide (commandeer) buses and large vans for mass transportation? What arrangements will be made?



"Special medical care may be required for irradiated and/or contaminated patients."

Q: When will this be arranged for off-site releases?
The only contract thus far is for on-site release!
There are no arrangements for off-site medical help.

Page 23 None of this has happened yet. Who pays?

Page 24 "Plans should include them."

Q: Do they?

Page 25 Public Information

Q: Before or after? Which is preferable?

Page 26 Training

"Programs and refresher courses."

Q: Who pays? "

"Each individual agency must train..." "These programs will be coordinated..." "These courses will be available...and will be conducted each year."

Q: Who pays?

Page 27 "The OES will assist any County agency..."

Q: Who assists the City agencies? Who pays?

"The Health Agency will provide to _____ agencies."

Q: To all or any agencies or to County agencies?

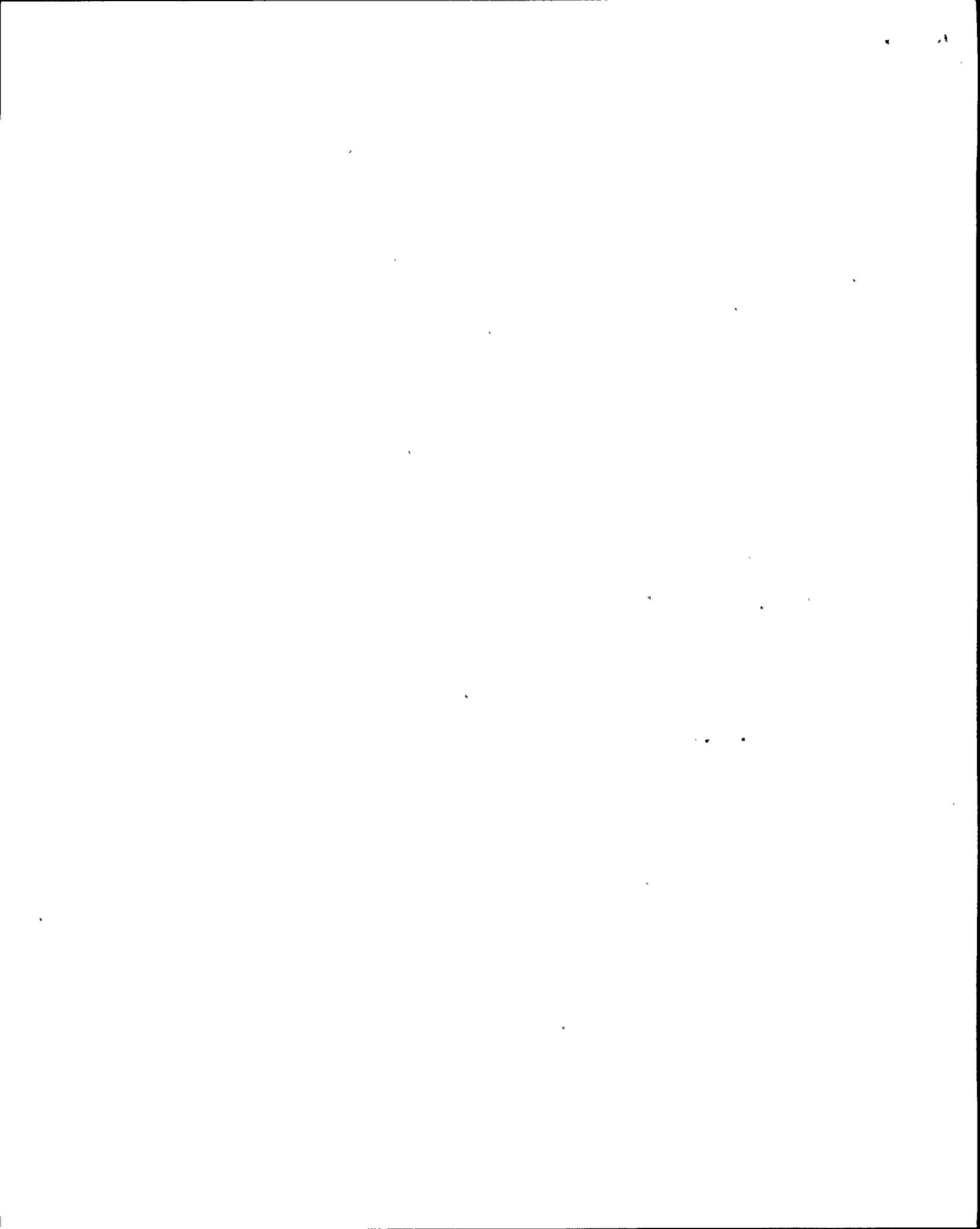
Exercises

"as often as they deem necessary."

Q: This is not an implementation plan, otherwise specific dates are needed!

"Exercise will include County, State, Federal and Private Agencies..."

Q: No cities?



Summary:

Our County government, through a misplaced belief that anything could go wrong, has reflected the same widespread unquestioning faith in technology that energy producing companies subject all of us to everytime we open our monthly electric bill. The chances of a power plant accident happening, they say, are infinitesimal. So don't worry: you might get hit by lightning sooner than by escaped radiation!

But the people are becoming aware. They know that Murphy's law works: that if something can happen it will happen. Nothing is accident proof.

The document is inherently unworkable as it now stands. I hope the implementation phase works out the details without rushing.

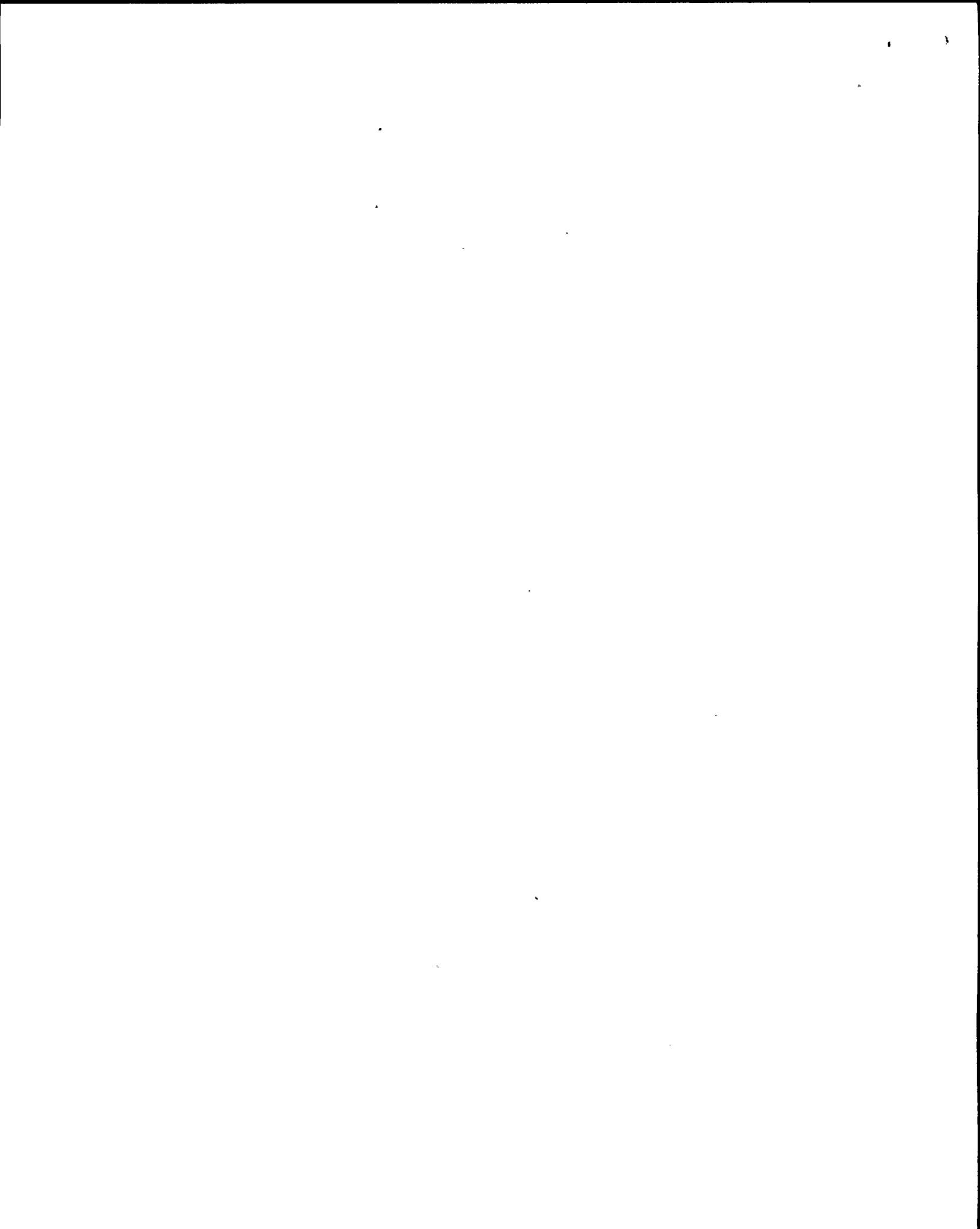
In closing I would like to quote from Albert Einstein (1946):

"Our representatives depend ultimately on decisions made in the village square...To the village square we must carry the facts of atomic energy. From there must come America's voice."

We are in the village square today and the voice of America's people is clear: there are serious problems associated with nuclear power safety and there are serious public costs associated with them that are yet to be determined.

Thank you for your attention.

RJK: submit copies of exchange of information by RJK - for the record.



BOARD OF SUPERVISORS

COURTHOUSE ANNEX • SAN LUIS OBISPO, CALIFORNIA 93401 • 805-543-1550, EXT. 321



Members of the Board
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M. E. WILLEFORD
KURT P. KUPPER
HOWARD MANKINS
DR. RICHARD J. KREJSA

September 17, 1976

The Honorable Robert J. Lagomarsino
Congressman, 19th District, California
House of Representatives
Washington, D.C. 20515

Dear Bob:

The letter from Lee Gossick was most interesting. I am enclosing a copy of my reply. One point you might find startling: the Sheriff's Evacuation Plan (the exclusive plan on which we have depended for the past few years) only applies to the Low Population Zone around the Diablo Canyon facility. This is an area within a 6-mile radius of the plant. It includes 18 or fewer people. Within a 7-mile radius, the number jumps over one thousand, and within 12 miles, it includes about half the population of our County!

Thank you for your help in bringing my inquiry about nuclear accident preparedness to the proper persons in the N.R.C.

Sincerely,

DR. RICHARD J. KREJSA
Supervisor, Fifth District
San Luis Obispo County

RJK:d

enclosure

Exhibit L



B. D. CONRAD, JR.
COUNTY ADMINISTRATIVE OFFICER

December 18, 1972

Mr. Raymond W. White, Manager
Claims and Safety Department
Pacific Gas and Electric Company
245 Market Street
San Francisco, California 94106

Attention: Mr. Hugh W. Reynolds

Dear Mr. Reynolds:

Thank you for your letter of December 8, 1972.

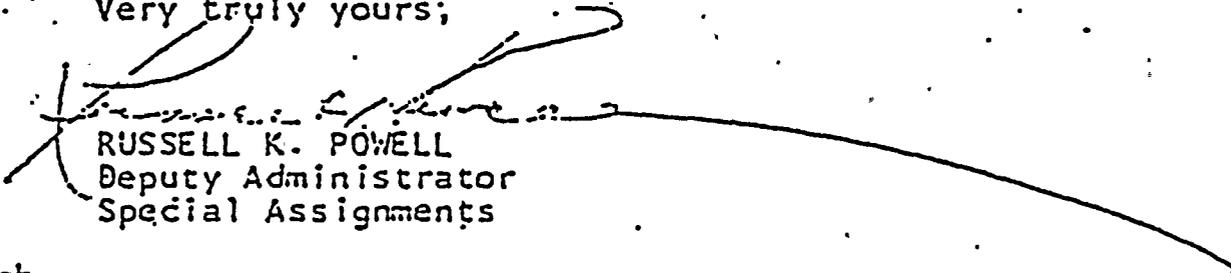
As you know, the Board of Supervisors is charged with the responsibility of caring for the citizens of the County, and readily accepts this premise insofar as the statutory and moral scope of their responsibilities are concerned.

Our Office of Civil Defense and Disaster stands ready to assist your company in efforts to protect the lives and well being of citizens should such an emergency occurrence arise at your Diablo Canyon Nuclear Plant.

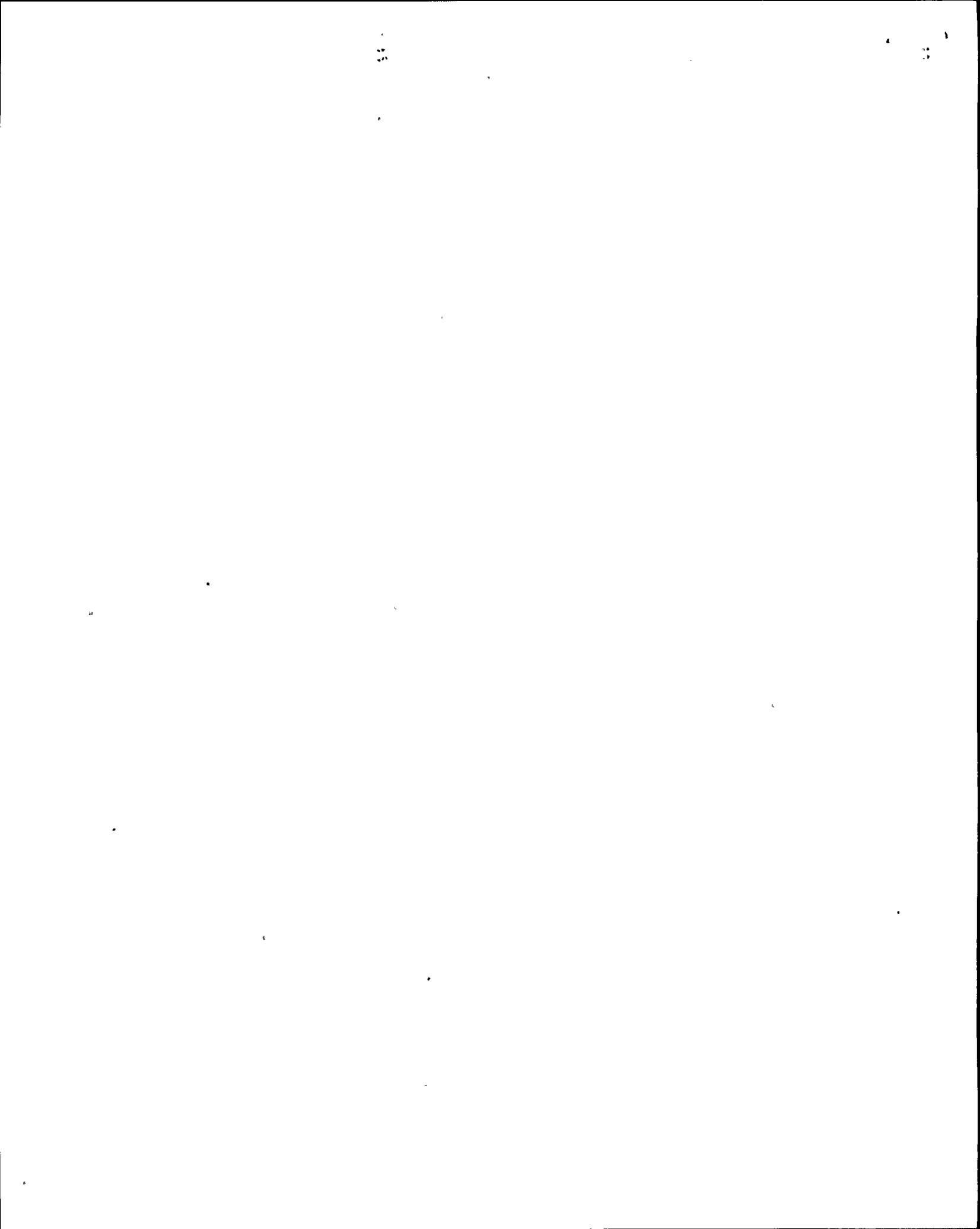
You are aware, I am sure, that the Board of Supervisors would need to officially order this office to put into effect the general rescue, transportation, enforcement and personal care facilities and planning based on the need of each individual. You will find them most receptive to the emergency needs at all times.

If we can help you further in this matter, please do not hesitate to call.

Very truly yours;


RUSSELL K. POWELL
Deputy Administrator
Special Assignments

ch



Five Cities Times - 21 Oct 77

Saw
BK

Krejsa Disputes Success Of Diablo Emergency Drill

SAN LUIS OBISPO — County Supervisor Richard Krejsa Thursday disputed PG&E's contention that the Aug. 18 Diablo Canyon emergency drill was successful.

Krejsa, who was away on county business during the Tuesday-Wednesday hearing of the Nuclear Regulatory Commission's atomic safety and licensing board, challenged the PG&E testimony in a letter to the board's chairman, Mrs. Elizabeth Bowers.

He said that during the mock emergency PG&E plant engineer James Shiffer, who testified at the hearing, had to stand against the glass window in the supervisors' room to pick-up messages from the plant on his walkie-talkie.

"What will happen to transmissions when we set up the temporary emergency operations center in the windowless basement of the San Luis Obispo Veterans Memorial Building?" Krejsa asked.

He said radio messages from the field teams monitoring the potential spread of radioactivity were "garbled and incoherent" and it took a sheriff's car an hour and 20 minutes to alert the 20

residents in the six-mile radius low population zone (LPZ).

What, he asked, would become of those residents "and the sheriff's deputy" if a more serious accident with prevailing winds of 12 m.p.h. had sent a radioactive cloud to the outer edge of the zone in 30 minutes?

"In fact, while meeting the federal requirements only requires considering the people within the LPZ, what happens to all the persons in See and Prefumo canyons who live within yards of the arbitrary six-mile radius who don't 'legally' have to be notified?"

"Furthermore, what about the near 50 per cent of the county's population living within the 12-mile radius of the plant who do not have to be 'legally' notified?"

Krejsa also said he doesn't know

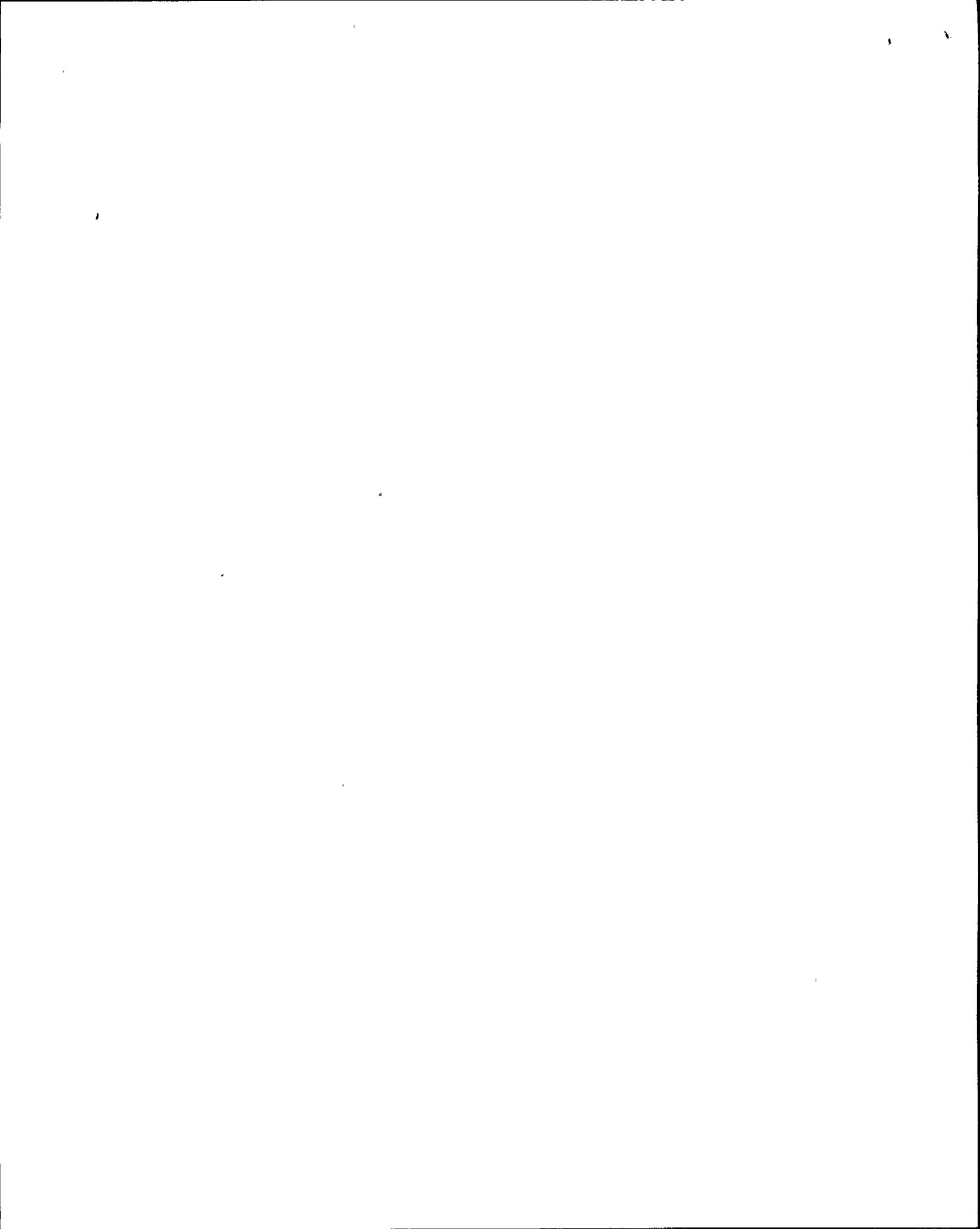
of any monitoring for south county vegetable fields that could become contaminated.

And he said the drill director commented "it will be two or three months before we can have a realistic test of the emergency system."

He said to meet federal requirements PG&E must only arrange medical services for employees injured on the site and there are no emergency provisions for off-site nuclear accident victims, the general public, in any of the county's hospitals at present.

Krejsa said the test was successful only to the extent that the sheriff's office had the after-5 p.m. phone number of disaster coordinator George Silva which it didn't have a year ago.

L



J.L.:

BOARD OF SUPERVISORS

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Members of the Board
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KURT P. KUPPER
HOWARD MANKINS
DR. RICHARD J. KREJSA

PRESS RELEASE

TO: ALL MEDIA

FROM: Dr. Richard J. Krejsa
Supervisor, Fifth District

SUBJECT: Diablo Canyon Nuclear Power Plant
Safety Hearings

DATE: October 20, 1977

The attached letter was sent today to the Chairperson of the Atomic Safety and Licencing Board.

attachment

RJK:d

(L)

