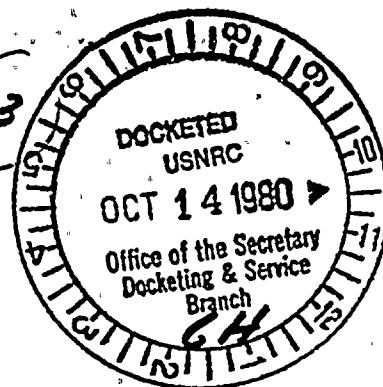


October 9, 1980

DOCKET NUMBER
PROD. & UTIL. FAC.

50-225/1323

Mr. Sam Chilk, Secretary of the Commission
Nuclear Regulatory Commission
Office of Mr. Brian Grimes, Emergency Preparedness
Office of Inspection and Enforcement
Washington, D.C., 20555



Dear Mr. Chilk,

I wish to have this letter entered in the proceedings for the licensing of Diablo Canyon Nuclear Power Plant, Avila, California.

I, Gordon Ernest Bruno, am a permanent resident of San Luis Obispo County. My residence is located on a ten acre parcel of land which is located on Pecho Ranch, but title to the property is separate from the Pecho Ranch title. The parcel is approximately two to two and a half miles north of the Diablo Nuclear Power Plant's reactor site.

A short time ago, I became concerned about the plans for evacuating the power plant area in the event of a nuclear accident or catastrophe. I made inquiries and learned that there is a Federal Documents Repository at California Polytechnic State University in San Luis Obispo, California.

While perusing documents on file, I found a document: Emergency Plan - Appendix 2, San Luis Obispo County Emergency Response Plan, December 22, 1976, Approved by the San Luis Obispo County Board of Supervisors, December 1976.

The portion of the document that attracted my attention is on page 18, item 2, specifically two sentences.

- " 1. Detailed evacuation procedures are maintained by the Sheriff's Department.
2. State Parks and Recreation maintains detailed procedures for evacuation of Montana de Oro."

See copies of these statements enclosed.

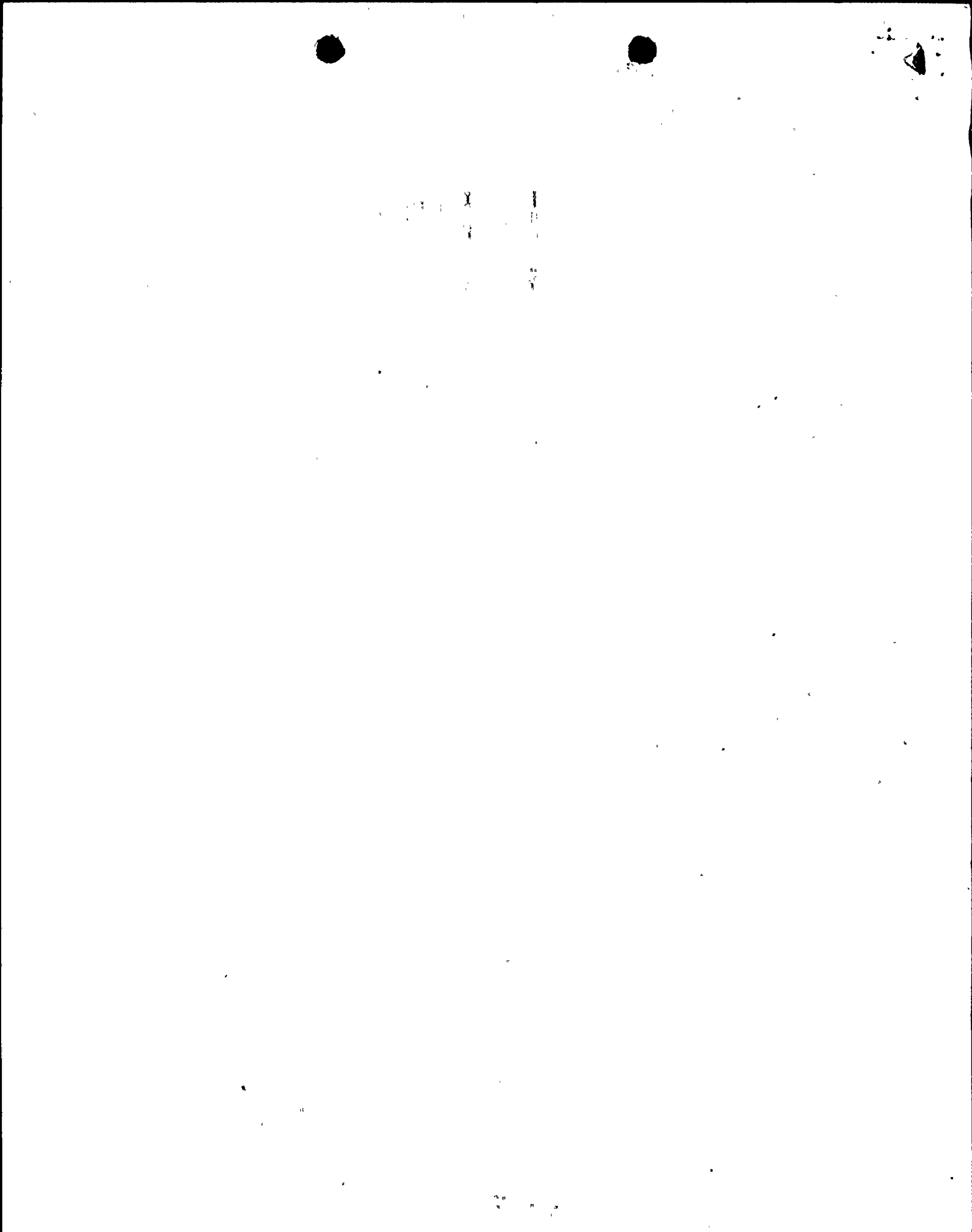
The document I described was presented to the N. R. C. by Pacific Gas and Electric on February 26, 1980 as a segment of an overall Emergency Evacuation plan for San Luis Obispo County. The question that arose in my mind was "Why is there a time difference of approximately three years and two months between the dates on the document?" December 22, 1976 - February 26, 1980. Also, I was curious why the documents hadn't been updated.

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After reflecting on these items, I thought that I should contact individuals who are in positions of authority in San Luis Obispo County.

On Monday afternoon, September 29, 1980, I met with Mr. Wesley Cater, Area Administrator for California Parks and Beaches, San Luis Obispo County. He gave me a xeroxed copy of the Montana de Oro Emergency Evacuation Plan that he has on file. It is dated November, 1975. It is very general and has many questionable areas. See enclosed copy of the plan.

The same afternoon, I went to speak with Sheriff George Whiting, Sheriff's Administrative Center, San Luis Obispo County. He secured their plan from the Watch Commander's office (I didn't see the plan), and told me that the plan was initiated in 1974, revised and approved in 1976.

On Wednesday afternoon, October 1, I met with Mr. Tim Ness, Emergency Services Coordinator, County of San Luis Obispo. The meeting was in the County Supervisors offices. I learned from him that the N.R.C. had convened a meeting on November 29, 1979 at the Shore Cliffs Inn, Shell Beach, California. He directed me to Dean Kunihiro, N.R.C. Regional office, Walnut Creek, California.

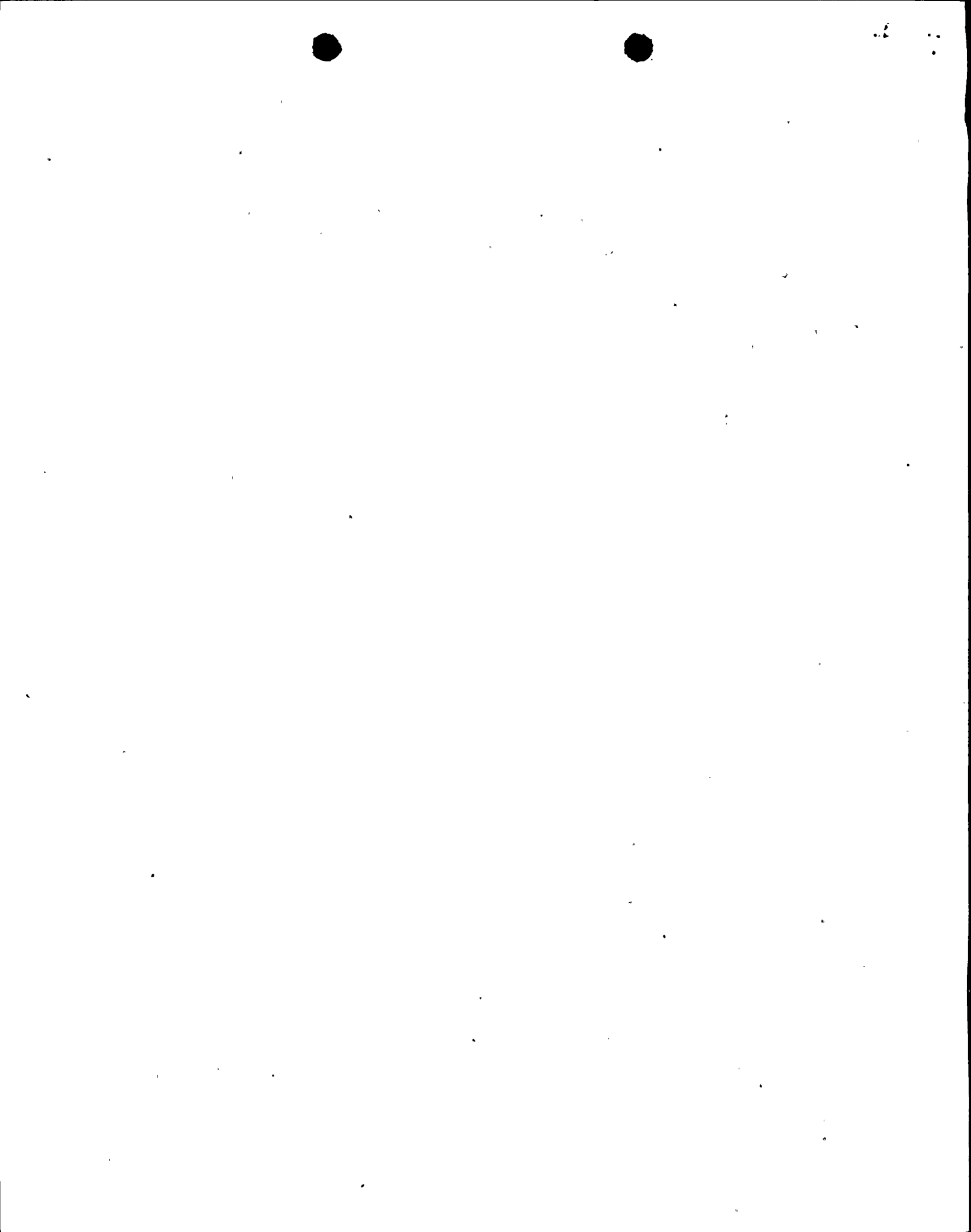
I telephoned Dean Kunihiro on Wednesday, October 1, and he informed me that he had moderated the N.R.C. November 29 meeting. I was interested in getting the minutes to the meeting, but was informed that none were taken. The only record of the meeting is a memo.

It is my understanding that the meeting was held because of the events that occurred at Three Mile Island, March 28, 1979. Its purpose was to present P.G. & E. with a number of criteria to fulfill its plans for its Diablo Canyon Nuclear power plant.

Mr. Kunihiro directed me to Brian Grimes, Office of the N.R.C. Director of Division of Emergency Preparedness, Office of Inspection and Enforcement. I phoned the office and spoke to Mr. Peter Tam, Team Captain of the Group Investigating Diablo Canyon Nuclear Power Plant. He told me that the only record of the Shell Beach meeting is a memo.

I, Gordon E. Bruno, do solemnly swear that all statements recorded by me are true to the best of my knowledge.

In view of the preceding statements, it is extremely difficult for me to comprehend how such important documents as the Sheriff's plan and the Montana de Oro State Park Plan have not been revised since 1976. They are found in the huge revised volume: Diablo Canyon Power Plant, Units I & II Emergency Plan, February 1980, Revised 2.



The Montana de Oro State Park is an integral part of the community, especially in the summer months. My contention is that P.G. & E., by presenting these two documents as detailed has placed the onus of responsibility on the County and the State. With the huge legal staff that P. G. and E. has at its disposal, the problem could have been researched very easily.

It is my conviction, on the basis of my conversations with the individuals from San Luis Obispo County, there have been no lengthy involved formal face to face meetings to decide specific allocations of men and materials that can be employed in Montana de Oro State Park in response to a nuclear accident or catastrophe at Diablo Canyon Nuclear Power Plant.

Respectfully submitted,

Gordon E. Bruno
Gordon E. Bruno

Enclosures
GEB/VFB

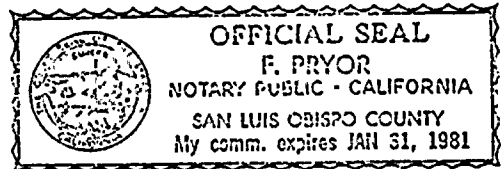
STATE OF CALIFORNIA
COUNTY OF San Luis Obispo } SS.
On October 9, 1980 before me,
the undersigned, a Notary Public in and for said County and State,
personally appeared Gordon E. Bruno

_____, known to me
to be the person whose name is subscribed to the
within instrument and acknowledged that _____ executed the
same.

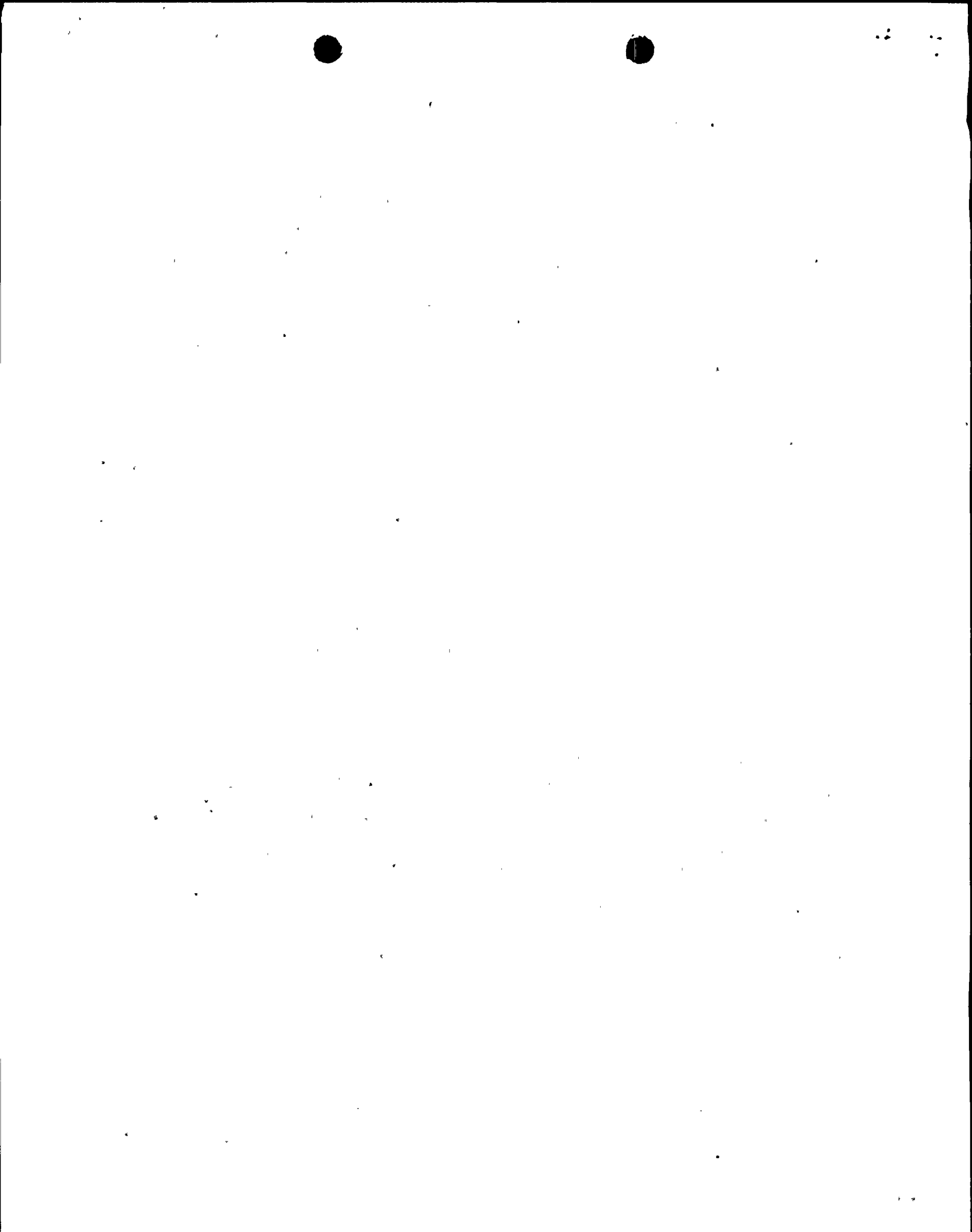
[Signature]



FOR NOTARY SEAL OR STAMP



Misc-166 (G.S.) Act. Individual (Rev. 9-68)
Simple



of the Zone. If time permits, the decision will be based on an evaluation of actual and predicted radiological and meteorological conditions.

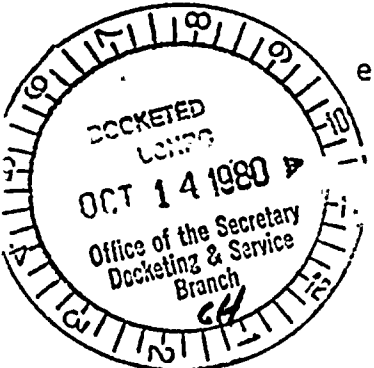
In unincorporated areas outside of the Low Population Zone, the County Emergency Organization as represented by the Chairman of the Board of Supervisors or the Director of Emergency Services has the responsibility and authority to direct the evacuation of those areas. The decision to evacuate populations will be made upon a comprehensive evaluation of all the data available pertaining to the radiological hazard and the threat that it presents to populated areas.

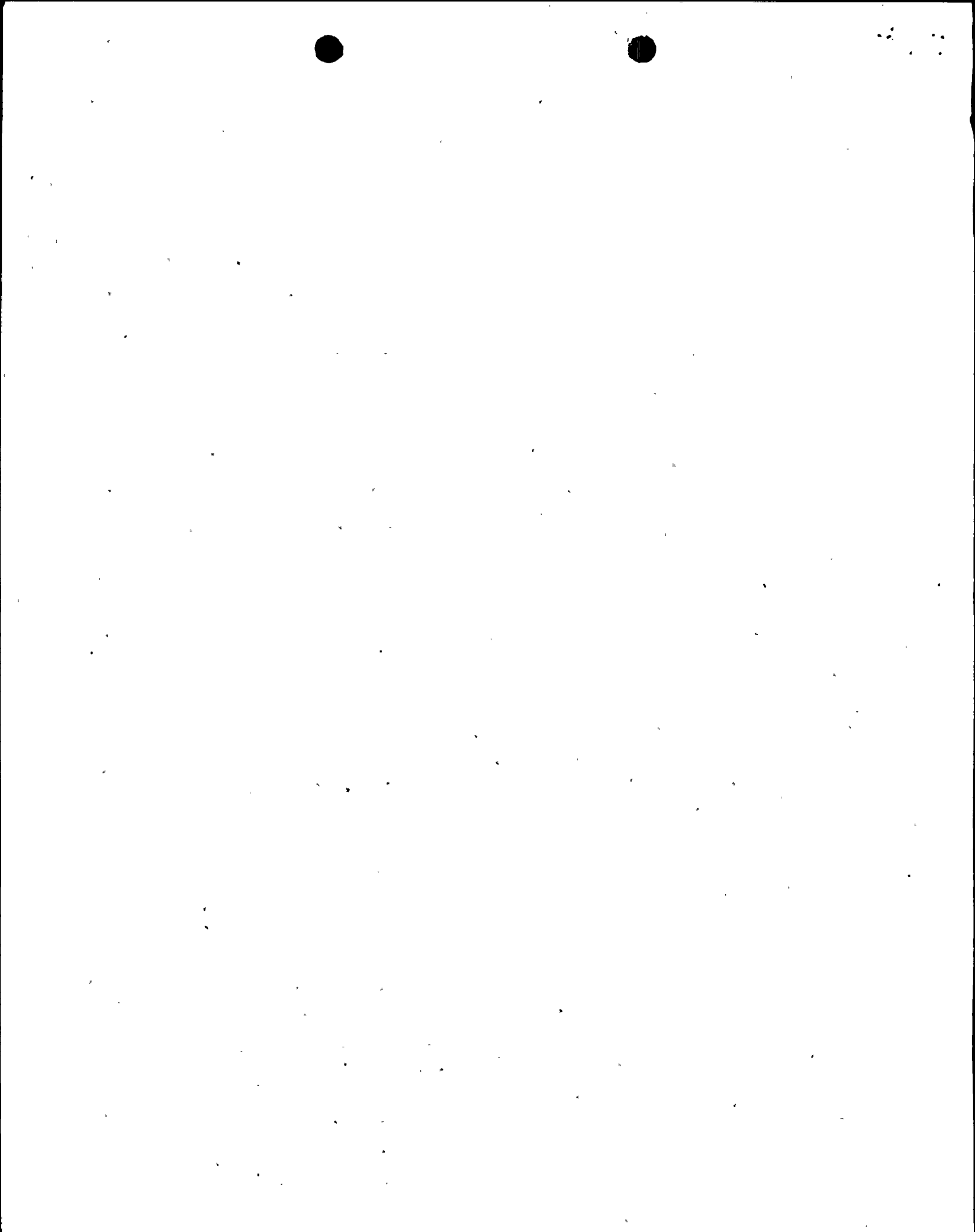
X

2. The Sheriff's Department is responsible for implementing procedures for evacuation of the Low Population Zone excluding Montana de Oro State Park. Detailed evacuation procedures are maintained by the Sheriff's Department. State Parks and Recreation maintains detailed procedures for evacuation of Montana de Oro.

The San Luis Obispo County Emergency Organization is responsible for implementing local evacuation procedures in the unincorporated areas. On warning that evacuation is or may be necessary, the County Emergency Organization will take preparatory action as follows:

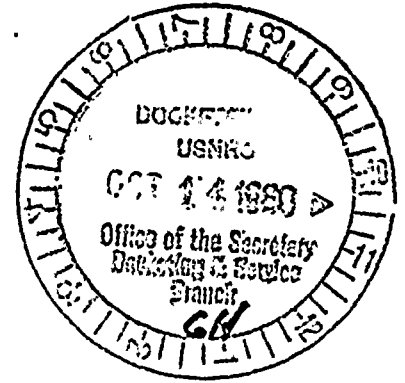
- a. Coordinate with the State Office of Emergency Services, State Department of Parks and Recreation, California Highway Patrol, City Police, and other jurisdictions and agencies that may be involved with the evacuation.
- b. Designate areas which are likely to require evacuation from potential radioactive contamination and identify points of safety nearby.
- c. Establish primary and alternate routes of evacuation.
- d. Provide emergency crews (monitoring teams, etc.) with access to the area(s) being evacuated.
- e. Designate evacuee assembly and departure points to expedite mass evacuation.





EVACUATION PLAN

DIABLO CANYON NUCLEAR POWER GENERATING PLAN



I. GENERAL

A. Purpose

To establish responsibilities and actions to assure the orderly evacuation of persons from threatened areas and the protection of real and personal property from theft and vandalism in the event of a nuclear accident at the Diablo Canyon Nuclear Power Generating Plant.

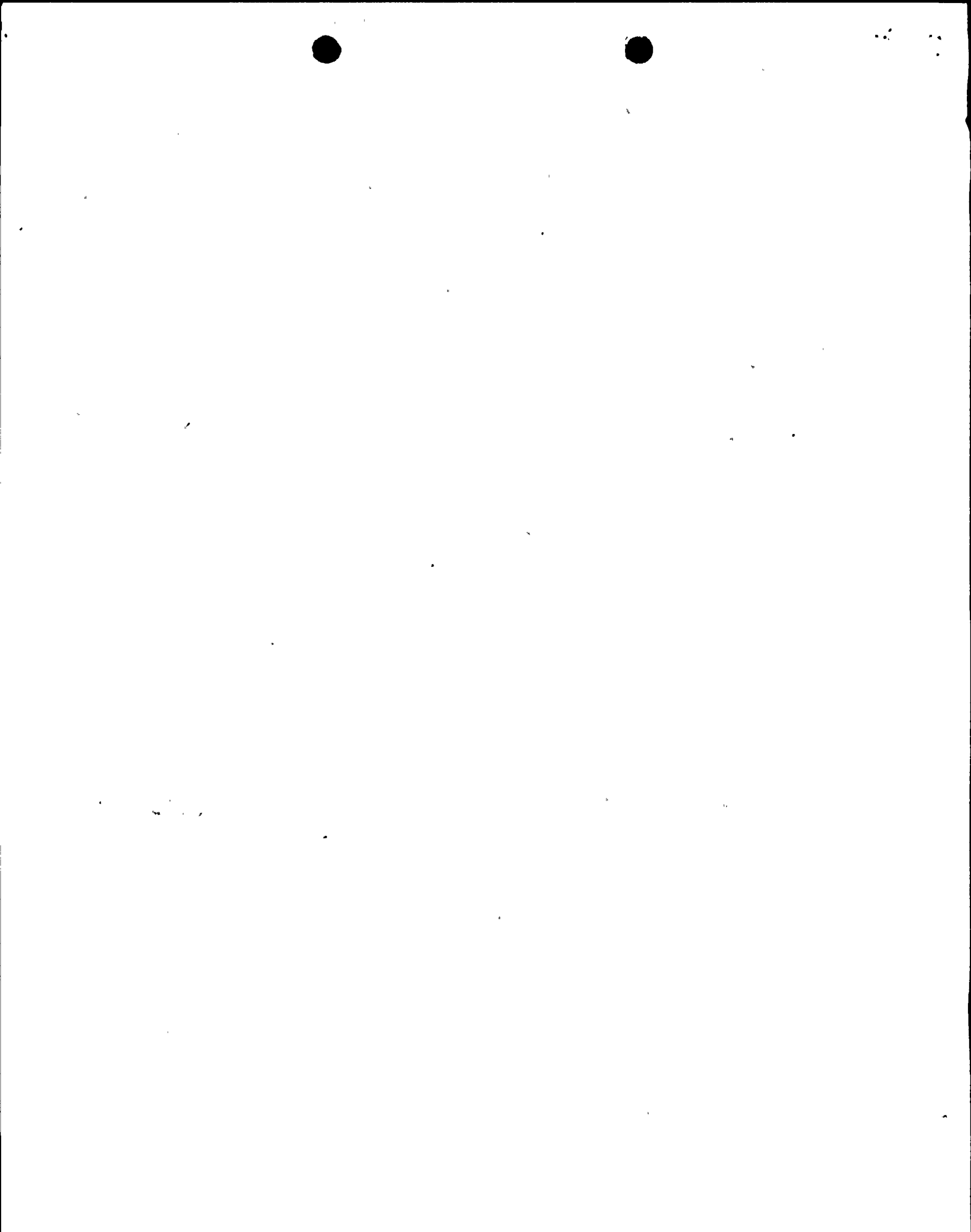
B. Objectives

1. Delineate responsibilities and tasks of State Park personnel.
2. Establish lines of authority and coordination when the plan is in effect.
3. Designate areas which are likely to require evacuation.
4. Establish primary and alternate evacuation routes.
5. Provide for alerting and warning of persons located in a potential evacuation area.
6. Set up procedures for orderly access to, progress along, and exit from evacuation routes.
7. Designate relocation sites for the San Luis Obispo Coast Area Headquarters, the emergency command post, and an alternate assembly point for personnel.
8. Provide for security of the evacuated area.

II. SITUATION

A. General

The Diablo Canyon Nuclear Generating Station is located on the Pacific Coast, about half way between Avila Beach and Morro Bay, or 12 miles S.W. of San Luis Obispo. It occupies an area of approximately 903 acres adjacent to the beach. The site abutts agricultural land on its three land boundaries. The general terrain is composed of 1000' high, steep hillsides and sea level canyons. No major highways serve the site, the closest being State Highway 101 near Avila Beach, 6 miles south of the site and State Highway 1 at Morro Bay, 11 miles north of the site.



The site presently contains a 99.8% complete Pressurized Water Reactor that will begin operation in 1976 and a second unit that will begin operation in 1977. Each unit will generate 1060 MWE of electricity.

It must be assumed that when a plant is operated, a nuclear accident with off-site consequences requiring evacuation is possible.

In the event of an accident with potential off-site consequences requiring evacuation, the station operators will initiate warning and alerting announcements as described below. These announcements will include recommendations concerning evacuation if indicated by instrumentation at the station.

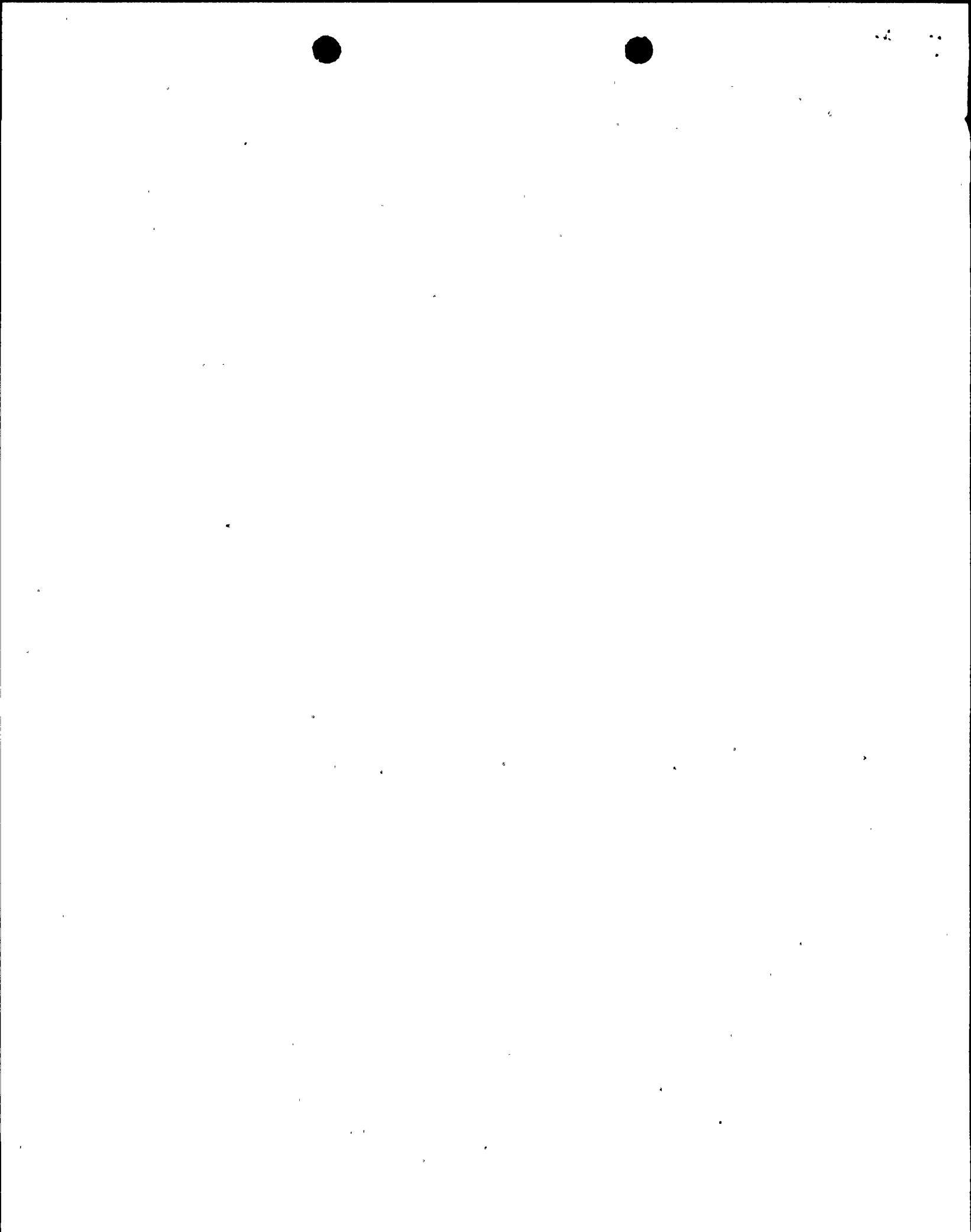
B. Potential Scope of Area Affected by Radiation from a Nuclear Accident

If a nuclear accident were to occur at the Diablo Canyon Nuclear Generating Station any portion of the area illustrated in Attachment A, Area Map, could be affected by radiation and require evacuation. This area includes all areas of present and planned future development at Montana de Oro State Park. Thus, this plan addresses itself to the evacuation and security for all of Montana de Oro State Park as illustrated in Attachment B, Projected Evacuation Routes for Montana de Oro State Park Map.

The mileage chart below shows the distance from the Generating Plant to some of the major facilities which may be affected.

POPULATION CENTERS OF 1,000
OR MORE WITHIN 17 MILES OF THE SITE

<u>Community</u>	<u>County</u>	<u>Distance & Direction From the Site</u>	<u>Population (1970 Census)</u>
Baywood-Los Osos	San Luis Obispo	8 miles N	3,487
Morro Bay	San Luis Obispo	11 miles N	7,109
San Luis Obispo	San Luis Obispo	12 miles ENE	28,036
Pismo Beach	San Luis Obispo	13 miles ESE	4,043
Grover City	San Luis Obispo	14 miles ESE	5,939
Oceano	San Luis Obispo	15 miles ESE	2,564
Arroyo Grande	San Luis Obispo	17 miles ESE	7,454
Cayucos	San Luis Obispo	17 miles N	1,772



III. EVACUATION AUTHORITY

A. State Parks and Beaches

The State park will be evacuated on order of the State Department of Parks and Recreation. The Department of Parks and Recreation will act upon recommendation of the San Luis Obispo County OES or the plant owner/operator.

IV. SYNOPSIS - GENERAL RESPONSIBILITIES OF STATE PARK PERSONNEL

A. The following is a brief statement of the responsibilities of State Park personnel in the event of a nuclear accident:

1. Alert appropriate agency personnel.
2. Dispatch personnel to beach areas and evacuate in accordance with the parks evacuation SOP when advised by the OES of either county or by the station.
3. Provide security against public re-entry of beach areas.
4. Assist other law enforcement agencies in the evacuation process to the extent that the Parks and Recreation capabilities are not compromised.

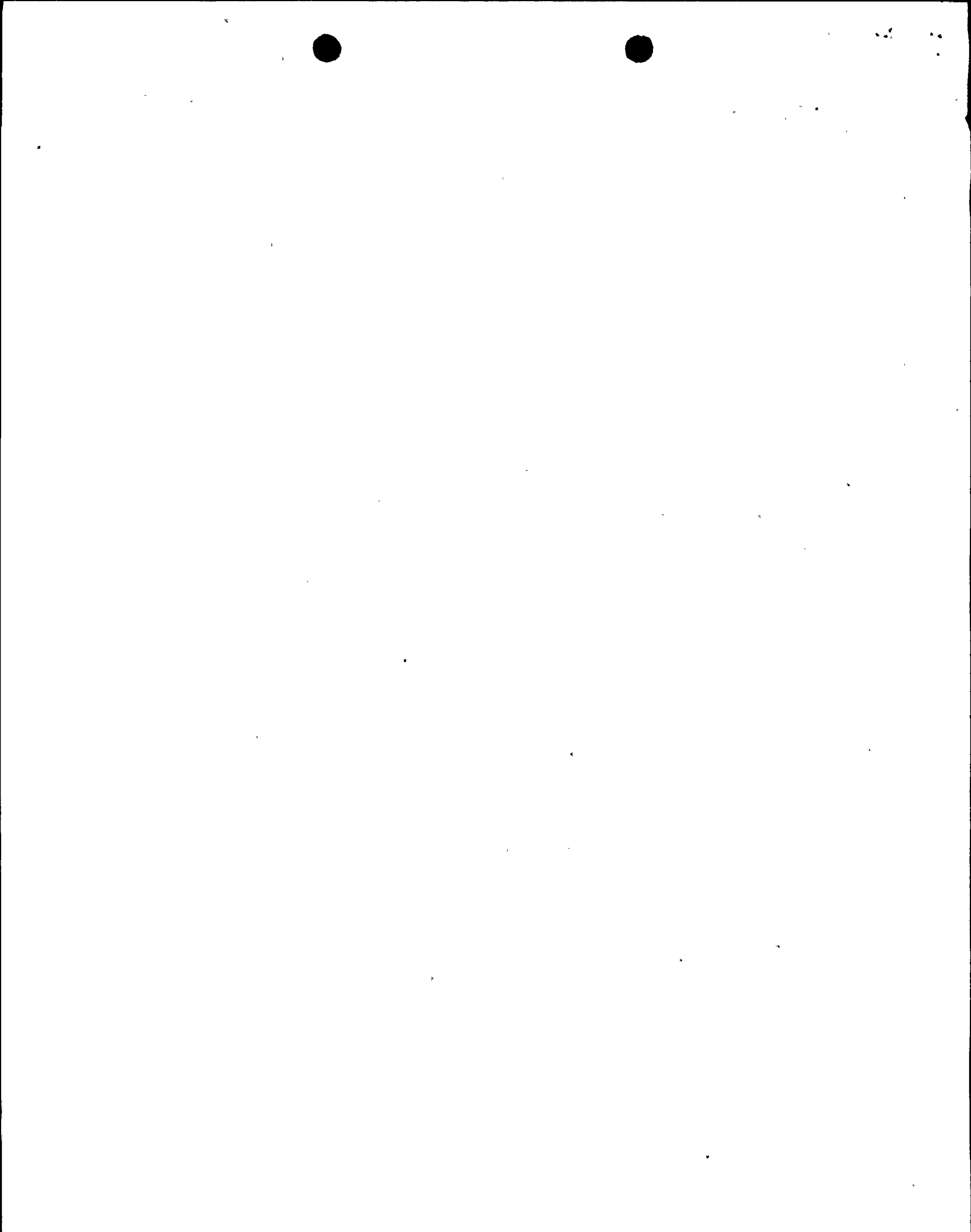
V. EVACUATION ROUTES AND ASSEMBLY AREAS

Evacuation routes and assembly areas have been designated as follows: (See Attachment B, B1, B2, and B3 Sector Evacuation Maps)

A. Following the signed evacuation routes which are indicated in the Evacuation Map and Sector Maps, begin evacuation as indicated by the alert.

<u>AREA</u>	<u>EVACUATION ROUTE</u>	<u>ASSEMBLY AREA</u>
<u>Montana de Oro State Park</u>		
Sector 1		
Bluff Road	North on Pecho Road to Los Osos, Morro Bay and State Highway #1	NONE
Grotto Rock		
Coon Creek Parking Lot		
Coon Creek Upland and Marine Terrace Trails		
Sector 2		
Oats Peak Trail	This area is on the extreme hazard limit area (4 1/2 miles from the Generating Station)	NONE
Valencia Peak Trail		
Spooners Cove Picnic Area	Evacuation - north on Pecho Road to Los Osos, Morro Bay and Highway 101	
Islay Creek Campground		
Corallina Cove		

CONTINUED



<u>AREA</u>	<u>EVACUATION ROUTE</u>	<u>ASSEMBLY AREA</u>
<u>Montana de Oro State Park</u>		
Sector 2 (CONTINUED)		
Quarry Cove	This area is on the extreme hazard limit area (4½ miles from the Generating Station) Evacuation - north on Pecho Road to Los Osos, Morro Bay and Highway 101	NONE
Park Office		
Islay Creek Trail		
Cross over and		
Midway Trails between North Fork of Islay Creek and Hazard Canyon		
Sector 3		
Hazard Canyon Trails	This Area is 5 plus miles from the Generating Plant and is on the perimeter of the most probable hazard limit	NONE
Lower Hazard Canyon Trail and beach from Hazard Canyon to the beginning of Sand Dunes.		
Beginning of Sand Spit and Pecho Park Entrance Road to its junction with Los Osos Valley Road	This area is the most northerly of Montana de Oro State Park and is on the limit of probable contamination. (6. plus miles from the Generating Station.)	

VI. COMMAND POSTS

A. State Parks

Primary - San Luis Obispo Coast Area, Route 2, Box 426, San Luis Obispo, California 93401 located 5 miles west of San Luis Obispo on State Highway #1 in Camp San Luis Obispo.

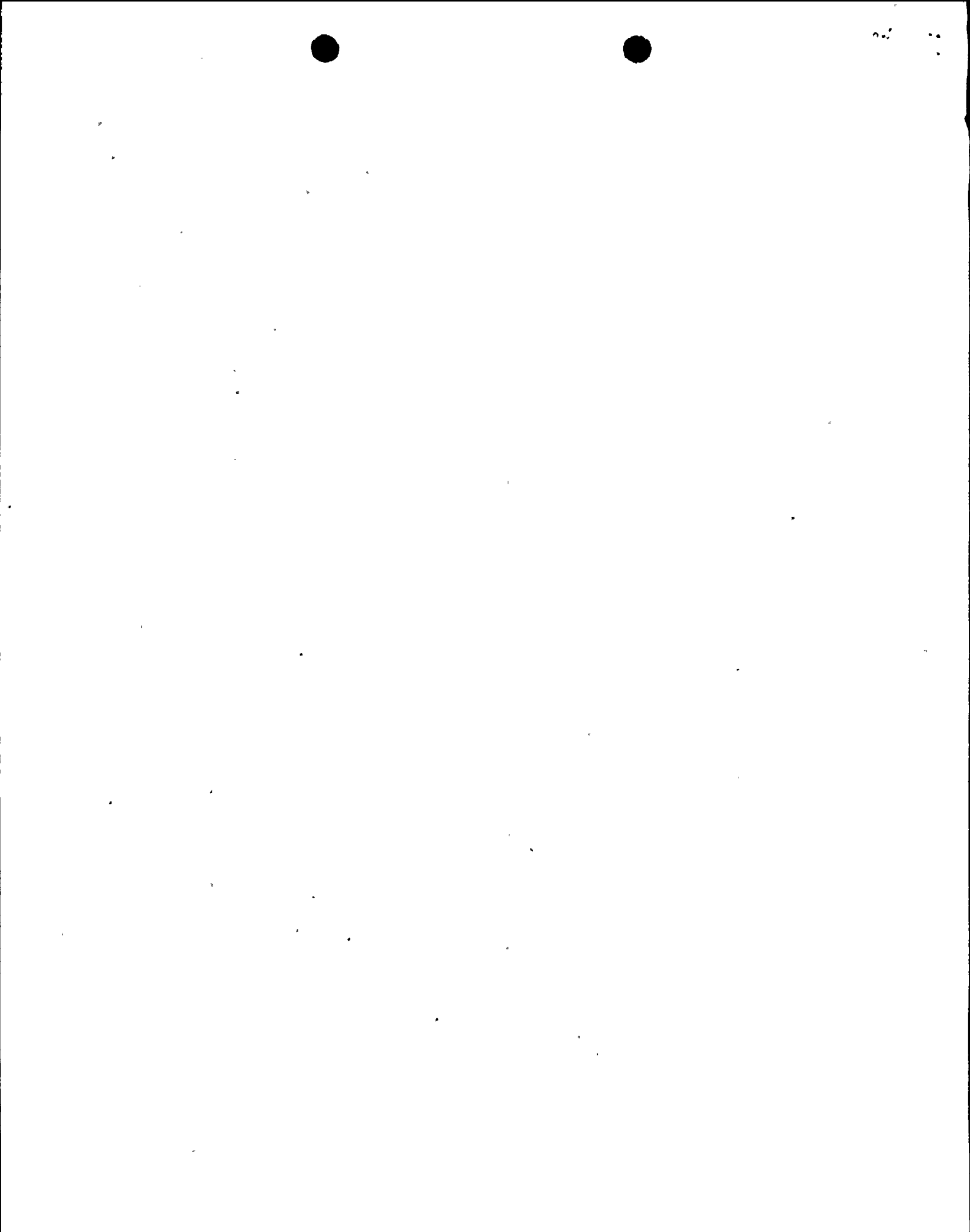
Secondary - Hearst San Simeon State Historical Monument, P.O. Box 8, San Simeon, CA. This area command post to be used if evacuation of State personnel from San Luis Obispo Coast Area office is requested by OES or other command agency.

Liaison Sites: San Luis Obispo County - To be established at a later date.

VII. TRAFFIC CONTROL POINTS AND SECURITY POSTS

As time need and manpower dictate the following traffic and security posts will be established:

A. Traffic Control Points



A. Traffic Control Points (CONTINUED)

1. Post #1 --- Pecho Road and Campground Road
2. Post #2 --- Pecho Road and Spooner Cove Day Use Area Entrance
3. Post #3 --- Pecho Road and Los Osos Valley Road

B. Security Posts.

1. Peace officer personnel of the California State Park System will maintain the traffic control posts to protect against re-entry of unauthorized personnel into the area. Additional security patrols will be maintained within the effected areas of the State Park to protect State and private property.

Note: These posts will be manned only if the hazard to personnel appears acceptable to the Area Manager or senior supervisor on duty.

VIII. ACTIONS

A. Nuclear Accident Alert - Operational Procedure

State parks will be notified on a nuclear accident alert and emergency shall commence:

1. Upon recommendation of the San Luis Obispo County OES via any means of communication (via identified personnel of the agency or verified telephone message).
2. Primary Alerting Procedure - To be established

B. Nuclear Accident Alert - Message Content - To be established at a later date

C. Duties

In the event of a nuclear accident, State park personnel shall upon receipt of alert:

1. Institute "Emergency Facility Plan Notification Recall" of Personnel.

Phase I - With personnel available assign on-duty personnel to evacuation of immediately effected area as outlined by alert call from generating station.

USE EMERGENCY CHECK LIST - Attachment C

(a) By priority:

1. Dispatch North Sector Personnel to begin a sweep of trails, roads and beaches at southern boundary on Montana de Oro State Park.



2. Upon being relieved by emergency team leaders report to Park Emergency Control Center at San Luis Obispo Coast Area Office for further assignment.

2. With emergency teams assembled by the "Emergency Facility Plan Notification Recall Plan" the emergency coordinator will:

a. By priority:

1. Assign emergency teams to Sector #2, and Security Posts:

(a) On-site evaluate and re-check emergency tasks performed by on-site personnel.

2. Establish Post #1. Area entry restriction post Campground and Pecho Roads

Establish Post #2. Security post Day Use Road - Spooner Cove.

Establish Post #3. Los Osos Valley Road and Pecho Road

3. Establish Security Posts. Upon completion of evacuation: Maintain traffic control posts for security purposes and provide additional mobile security patrols as needed.

D. Termination of Emergency and Re-entry into Area

1. The termination of the emergency and re-entry into the State Park by the public and by non-essential State personnel shall be determined by the District Superintendent based upon advise from State OES.

E. Public Information

1. Prior to Emergency - To be established

2. During Emergency - To be established

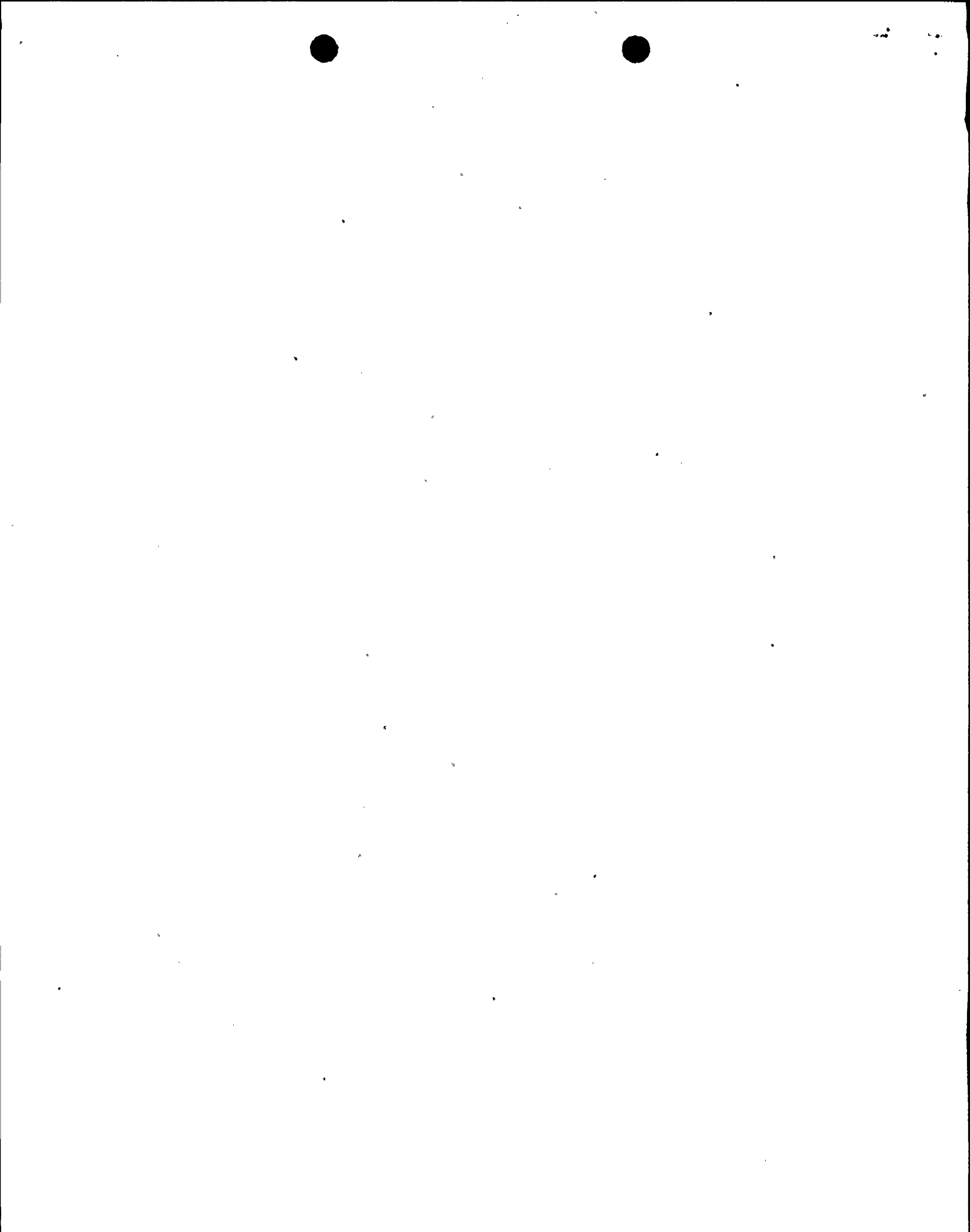
3. Press Information

a. All requests for information regarding the State Park by news media will be channeled to: (a) District Superintendent; (b) Area Manager.

b. All other requests for information regarding the incident shall be channeled as follows:

On-Site

News releases related to the cause of the accident, ex-



tent of damage, length of shutdown, or anything pertaining to on-site problems shall be issued by the plant owner/operator.

Off-Site

News releases related to evacuation, or pertaining to off-site problems shall be issued by the San Luis Obispo OES offices.

San Luis Obispo County

The San Luis Obispo County Office of Emergency Services will coordinate public news releases and releases to State and Federal regulatory agencies with the response agencies and the station operator. To avoid confusion and content, all information released from the San Luis Obispo OES will be disseminated from one official source.

Copies of all news releases should be provided to all command posts.

F. State Parks - Resources and Supporting Systems (Available June 1975)

1. Manpower

Sixteen uniformed Peace Officers who are Rangers in the San Luis Obispo Coast Area. Three of these individuals are first-line supervisors and two are second level supervisors. The number of on-duty personnel varies considerably throughout the year.

2. Material

a. Vehicles available (Radio and Code 3 equipped)

Sedans	<u>4</u>
4 Wheel Drive	<u>6</u>
Pick-ups	<u>8</u>
Buses	<u>0</u>

b. Fuel

- (1) Morro Bay State Park
- (2) Mobil, Arco, Enco, Standard Stations

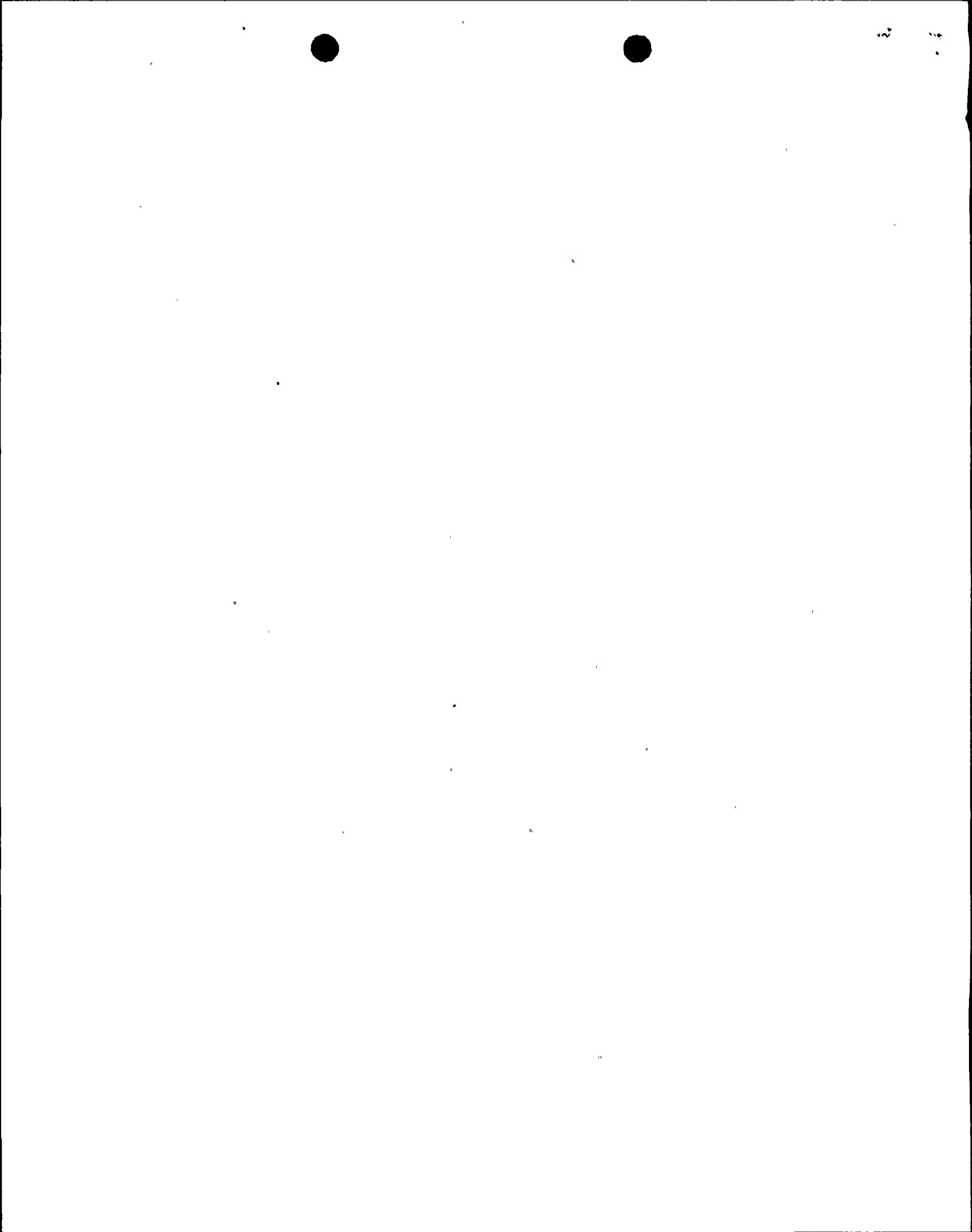
c. Communications Equipment

Walkie Talkies	<u>8</u>
Bull Horns	<u>2</u>

3. Supporting Systems

State Park Maintenance Services (15 personnel)

Seasonal Personnel (number varies by time of year)



IX. TRAINING FOR OPERATION OF NUCLEAR EMERGENCY EVACUATION PLAN

Purpose: In addition to the general briefing and training accomplished to prepare for the areas' general facility Emergency Evacuation Plan which covers most natural and man-made disasters, the accompanying training plan is directly addressed to the special training needs of personnel involved in the emergency evacuation of Montana de Oro State Park in the event of a nuclear accident at the PG & E Generating Station.

A. General Training

All area personnel, both permanent and seasonal shall receive an initial briefing on the content of the Evacuation Plan, and an annual update briefing covering all aspects of the general provisions of the plan to include review of current evacuation routes for the park to be used in the event of a nuclear accident.

1. Seasonal Personnel

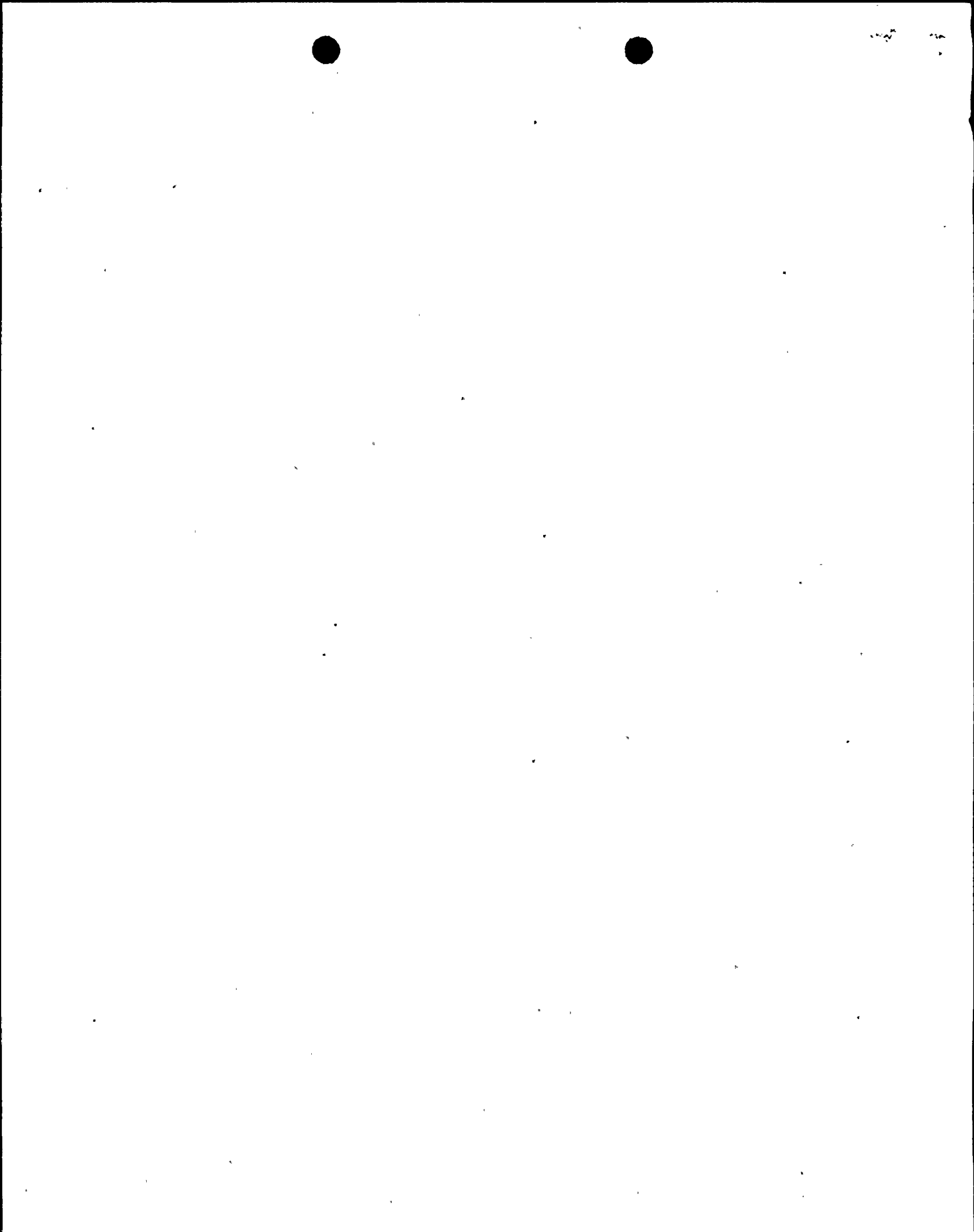
This training briefing shall be performed along with seasonal orientation and shall consist of:

- a. General briefing on the plan
 1. Need for emergency evacuation plan
 2. Part to be played by seasonal and on-site personnel
- b. Evacuation Routes
- c. Special assignments
- d. Procedures on relief from duty for return to command post.

2. Permanent Personnel

Training for permanent personnel shall consist of:

- a. General briefing on plan
 1. Type of emergency
 2. Need for evacuation
 3. Evacuation routes, means and alternatives
- b. Assignments to be accomplished by on-site personnel at Montana de Oro State Park.
- c. Emergency Evacuation Team Training - General
 1. Emergency notification and recall plan



2. San Luis Obispo Coast Emergency Command Post
Location, assignment and equipment.

3. Emergency Evacuation Team assignments:

Command Post

Sector 1

Sector 2

Security and traffic posts if decontamination

B. Emergency Evacuation Team Radiological Monitor Training

All personnel assigned to Emergency Evacuation Teams shall, before assignment, satisfactorily complete the following Radiological Monitoring Courses through the State or County Office of Emergency Services consisting of:

1. Basic Radiological Safety Course (1-day)

Designed to provide basic information and skills in radiological safety and the control of radiation hazards. Graduates are qualified as "Basic Radiological Monitors". Subjects include: effects of nuclear accidents or detonations, physical and biological effects of nuclear radiation, decay of radioactive materials, protective measures, operations of detection equipment and procedures for peacetime nuclear accidents.

2. Advanced Radiological Safety Course (1-day)

Registration for this course requires completion of the Basic Radiological Safety Course (above). Graduates are qualified as "Advanced Radiological Monitors". Designed especially for safety personnel (i.e.; law and fire) and for key personnel and supervisors, or those who require advanced skills in control of peacetime accidents, or personnel assigned to disaster control centers. Subjects included: Radiation shielding, calculations with radiation decay curves for control measures in field operations. Peace time accident field exercise and handling of radioactive materials. Decontamination measures.

This training will be followed on an annual basis by:

a. Radiological Safety Refresher Course (2½ hours).
For all radiological safety monitors (basic and advanced) refresher course sessions.

3. Special training for Area Manager and Emergency Coordinator

a. Peacetime Radiation Incidents. (4½ days) Designed for key operations personnel in the safety services and medical profession. Completion of Advanced Radiological Monitor



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course is required for registration. Subjects covered are specialized and technical in the emergency handling of radiation casualties, accident control measures and detailed requirements for decontamination.

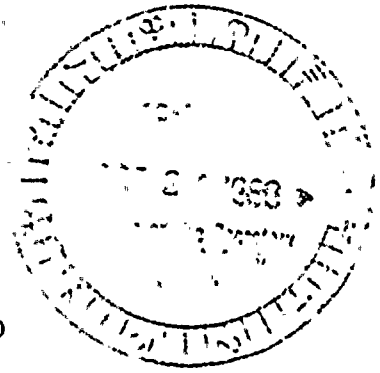
C. General Evacuation Emergency Operation Test

1. General operational test of training and equipment shall be performed through an exercise on site designed to test the effectiveness of personnel, training and equipment during the month of November on a date to be specified by the Area Manager.
2. An evaluation report indicating performance, improvement needed, extra training or equipment shall be forwarded to the District Superintendent by December 31.

X. SPECIAL RADIOLOGICAL MONITORING EQUIPMENT - To be established

- A. Equipment - To be established
- B. Maintenance - To be established
- C. Accountability for Special Equipment - To be established
 1. Disposable Protective Clothing - To be established
 2. Personal Radiation Monitoring Devices - To be established

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PACIFIC GAS AND ELECTRIC)
COMPANY)
)
Units One and Two)
)
Diablo Canyon Site)
)
_____)

Dockets 50-275-OL
50-323-OL

13 OCT 80

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance in the above-captioned matter. In accordance with applicable provisions of 10 CFR Part 2, the following information is provided:

- Name: - Joel Reynolds
- Address - Center for Law in the
Public Interest
10203 Santa Monica Blvd.
Los Angeles, California
90067
- Telephone Number: - (213) 879-5588
- Admitted to Practice: - California
- Names of Parties: - Scenic Shoreline Preserva-
tion Conference, Inc.
c/o Frederick Eissler
4623 More Mesa Drive
Santa Barbara, California
93110

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San Luis Obispo Mothers for Peace,
Sandra Silver, Gordon Silver
c/o Mr. and Mrs. Gordon Silver
1760 Alisal Street, San Luis
Obispo, California 93401

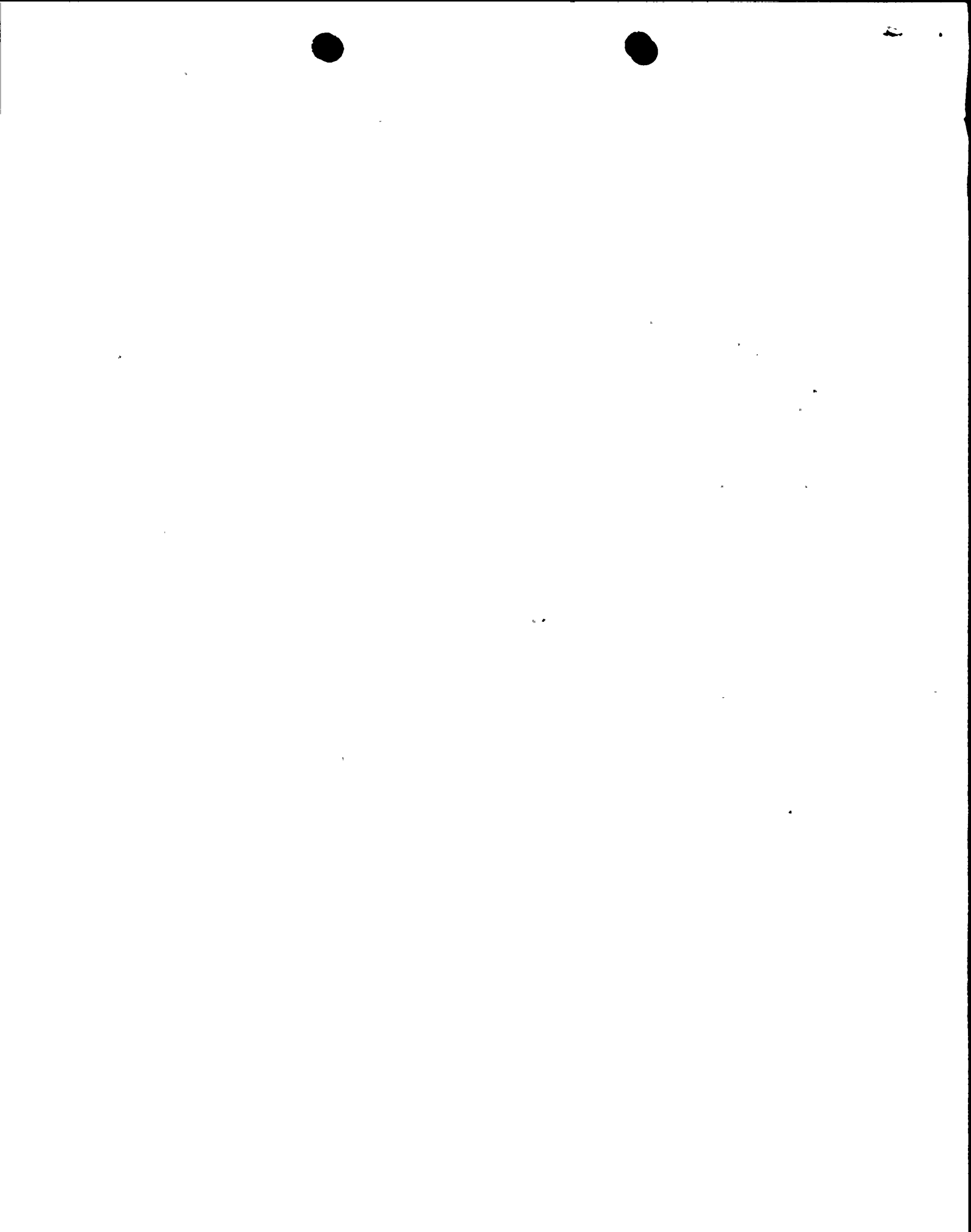
Ecology Action Club,
John J. Forster
c/o Ecology Action Club
California Polytechnic State
University
ASI Box 188
San Luis Obispo, California
93401

Mrs. Elizabeth Apfelberg
1415 Cozadero
San Luis Obispo, California
93401

Dated at Los Angeles,
California this 13th day
of October 1980.



Joel R. Reynolds



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of:

PACIFIC GAS & ELECTRIC
COMPANY
(Diablo Canyon Nuclear
Power Plant, Units 1 & 2)

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

CERTIFICATE OF SERVICE

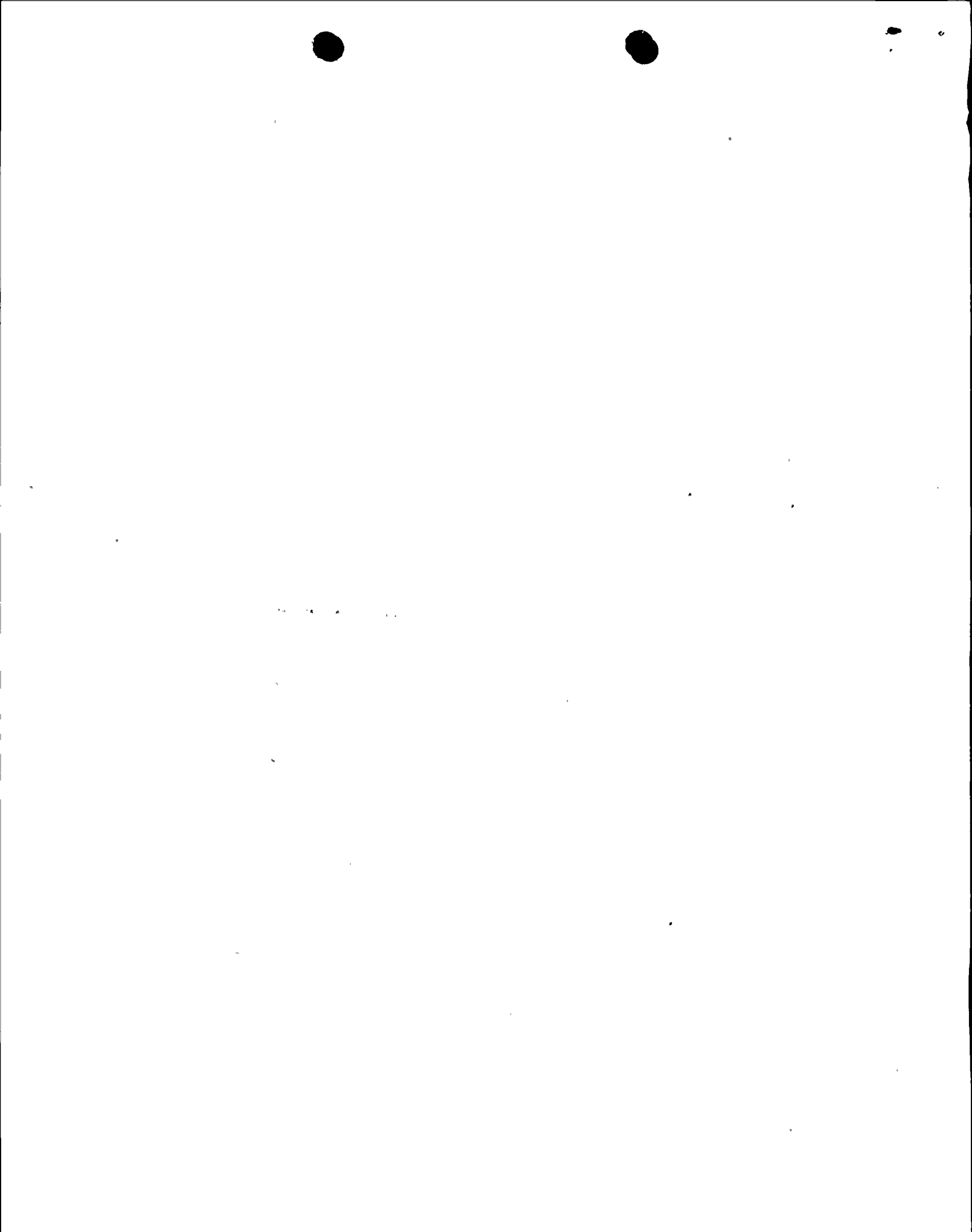
I hereby certify that on this 17th day of October, 1980, I have served copies of the foregoing NOTICE OF APPEARANCE of Joel R. Reynolds, mailing them through the U.S. mails, first class, postage prepaid.

Joseph M. Hendrie,
Commissioner
U.S. Nuclear Regulatory
Commission
1717 H Street, N.W.
Washington, D.C. 20555

Victor Gilinsky,
Commissioner
U.S. Nuclear Regulatory
Commission
1717 H Street, N.W.
Washington, D.C. 20555

Richard T. Kennedy,
Commissioner
U.S. Nuclear Regulatory
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Peter A. Bradford,
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Chairman
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
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Dr. W. Reed Johnson
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Appeal Board
U.S. Nuclear Regulatory
Commission
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Dr. John H. Buck
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Commission
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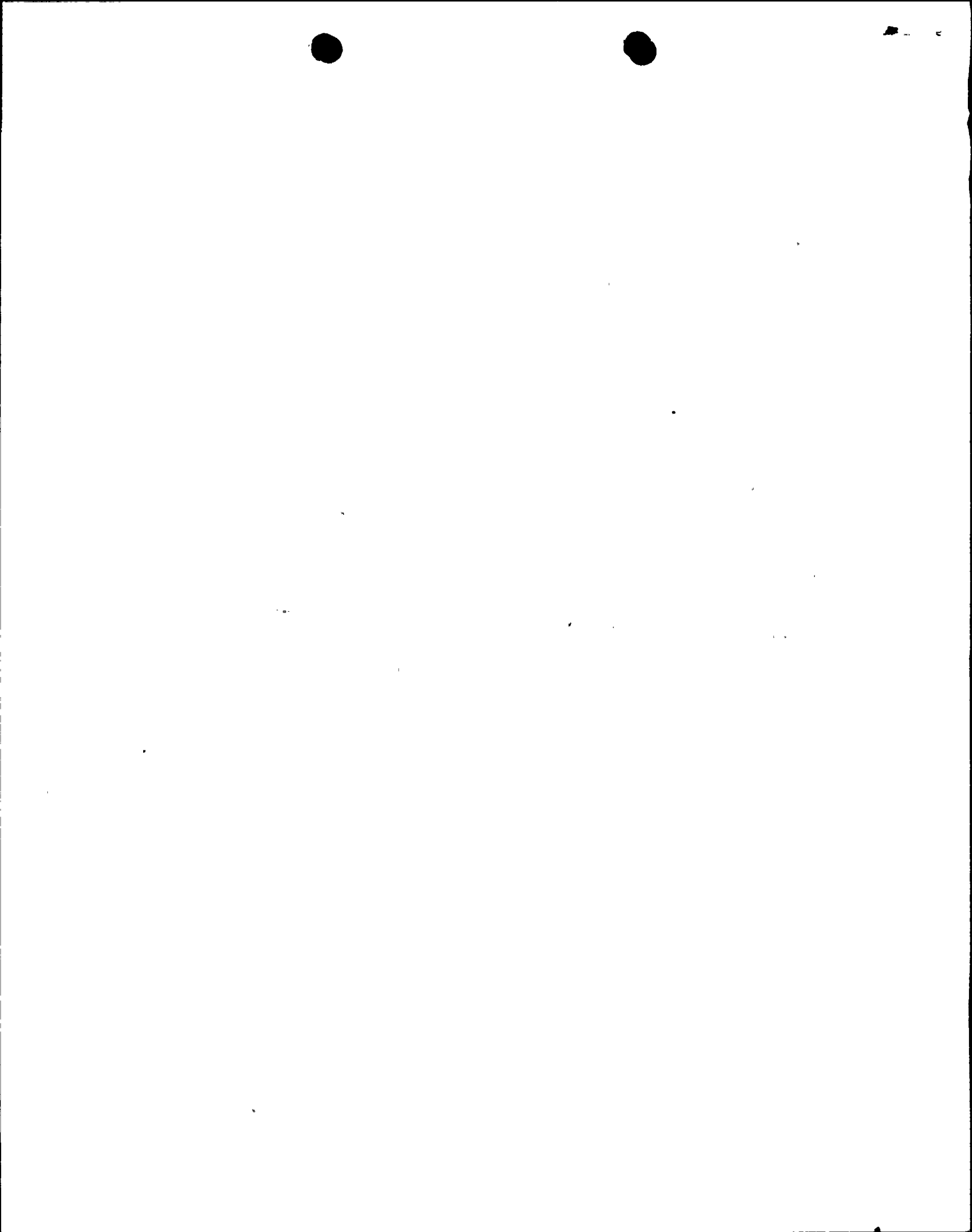
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