



Department of Energy

LABOR & INDUSTRIES BUILDING, ROOM 102, SALEM, OREGON 97310 PHONE 378-4040

Docket No. 50-344

9/15/80

To: Paul Yundt, Trojan

[Redacted]

Robert Engelken, NEC, Region I

Don Hull, ODOGMI

Harvey Latham, ODES

Marshall Parrott, OSHD

From: Bill Dixon, ODOE

On August 8, 1980, the Physicians for Social Responsibility (PSR) resubmitted their petition to EFSC requesting the Trojan Site certificate be withdrawn due to volcanic activity of Mt. St. Helens. On September 11, 1980, the EFSC Chairman and ODOE Director responded to the petition via the attached letter and report. If the other EFSC members concur, the petition will be formally denied. The EFSC Chairman, ODOE, and PSR will be meeting on September 17, 1980 to discuss this matter.

Note: PGE (William Zimmerman) have copies of report

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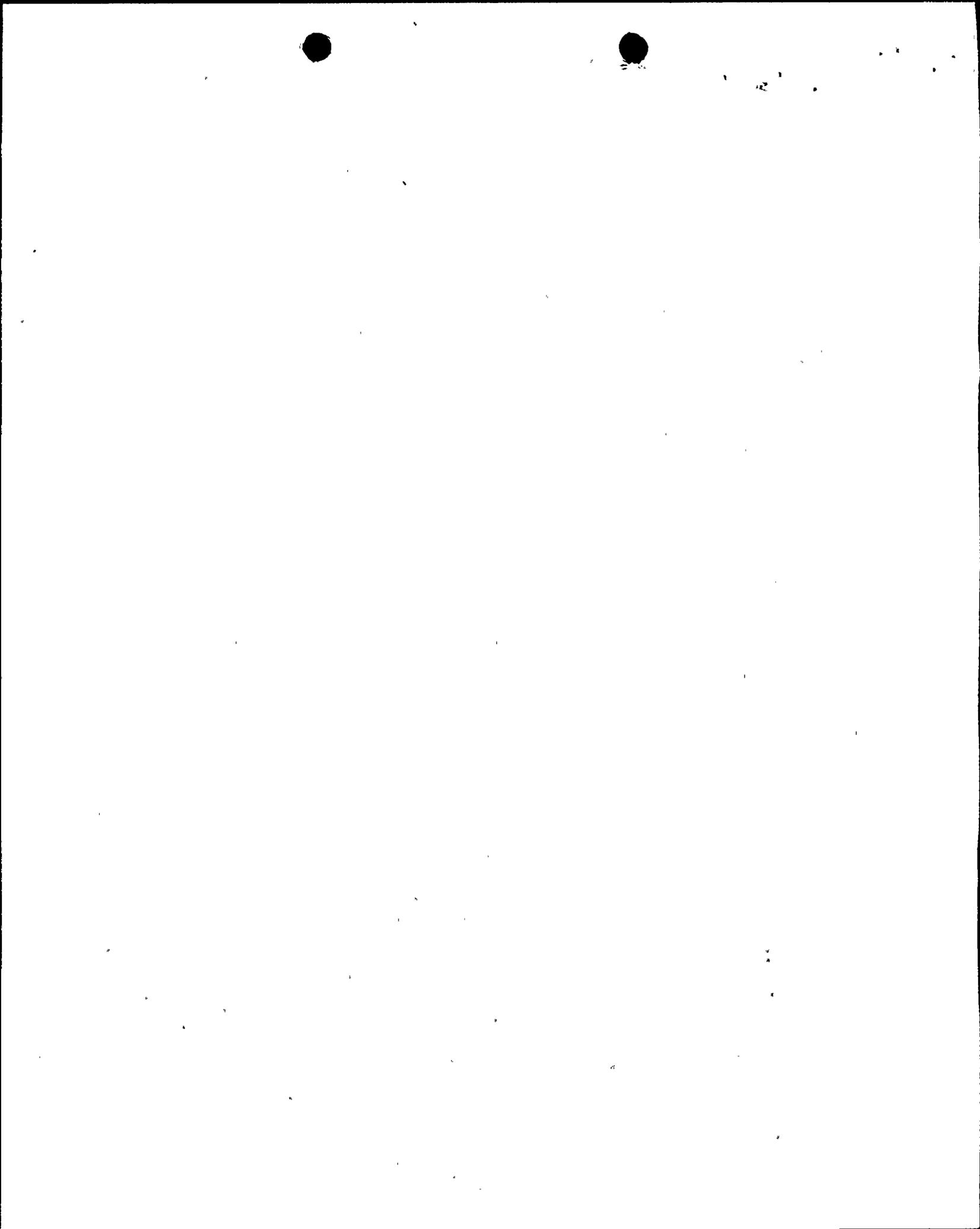
DUPE OF

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- ADD: CE
- R BOSNAK
- H BRAMMER
- T McKENNA
- B GEHMS
- F PAGANO

- ADD: LE
- H LEFEVRE
- R JACKSON
- W BIVINS
- Y. LI

ADD: 11
A003/11





VICTOR ATTYEH
GOVERNOR

Department of Energy

LABOR & INDUSTRIES BUILDING, ROOM 102, SALEM, OREGON 97310 PHONE 378-4040

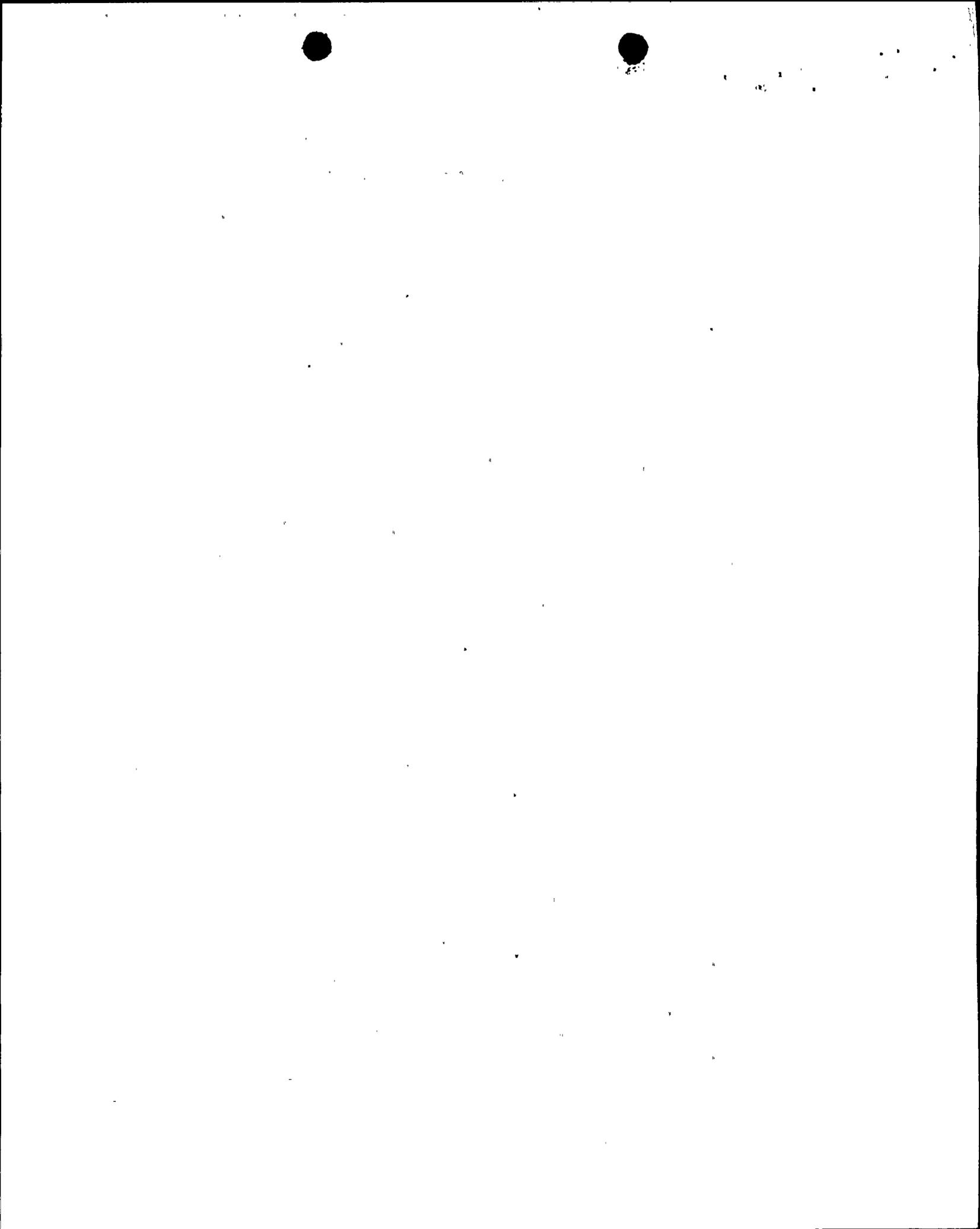
September 11, 1980

Dr. Beth Packer
Portland Chapter of Physicians for
Social Responsibility
1715 S.E. Pine
Portland, OR 97214

Dear Dr. Packer:

At the Energy Facility Siting Council (EFSC) meeting on August 8, 1980 you resubmitted a petition from the Portland Chapter of Physicians for Social Responsibility (PSR) requesting that the site certificate for Trojan be immediately revoked due to volcanic activity of Mt. St. Helens. The resubmitted petition was identical to the one you submitted at the July 11, 1980 EFSC meeting except for some additional signatures. The original submittal was responded to by a letter from the EFSC Chairman to you on July 14, 1980. That letter stated that based on review of an Oregon Department of Energy (ODOE) staff report on this matter, EFSC and the ODOE Director had determined that no breach of warranty, failure to comply with EFSC rules or site certificate conditions, or clear and immediate danger to the public exists. A copy of the ODOE staff report was provided to you. In your oral presentation resubmitting the petition you contended that several issues have not been adequately considered by EFSC and ODOE.

The EFSC Chairman and the ODOE Director have evaluated your verbal contentions and conclude that they do not provide a substantive basis for either revoking Trojan's site certificate or ordering curtailment of operations. Specifically, no breach of warranty, failure to comply with EFSC rules or site certificate conditions, or clear and immediate danger to the public was identified. Also, we do not believe any rules or regulations of the Nuclear Regulatory Commission (NRC) have been violated. Recent actions by NRC to deny similar petitions support this belief. The basis for this decision are documented in the attached report. We will discuss any comments that you have on this issue at our meeting with PSR on September 17, 1980.



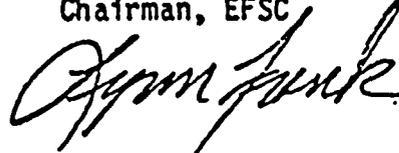
Dr. Beth Packer
September 11, 1980
Page Two

At the two EFSC meetings where you submitted the petition, you requested immediate action, but you also called for a scientific approach to address this matter. As the EFSC Chairman stated to you on August 8, 1980, these demands are not consistent. It is unreasonable to pose several technical questions and then demand immediate and carefully considered answers and actions. We urge that if you have further concerns on this matter that you review them with our staff and others knowledgeable in the particular areas of concern. If you have substantive concerns that are not resolved it would then be appropriate to submit them to us for consideration. Such submittal should document in writing your concerns and the basis for them.

Sincerely,

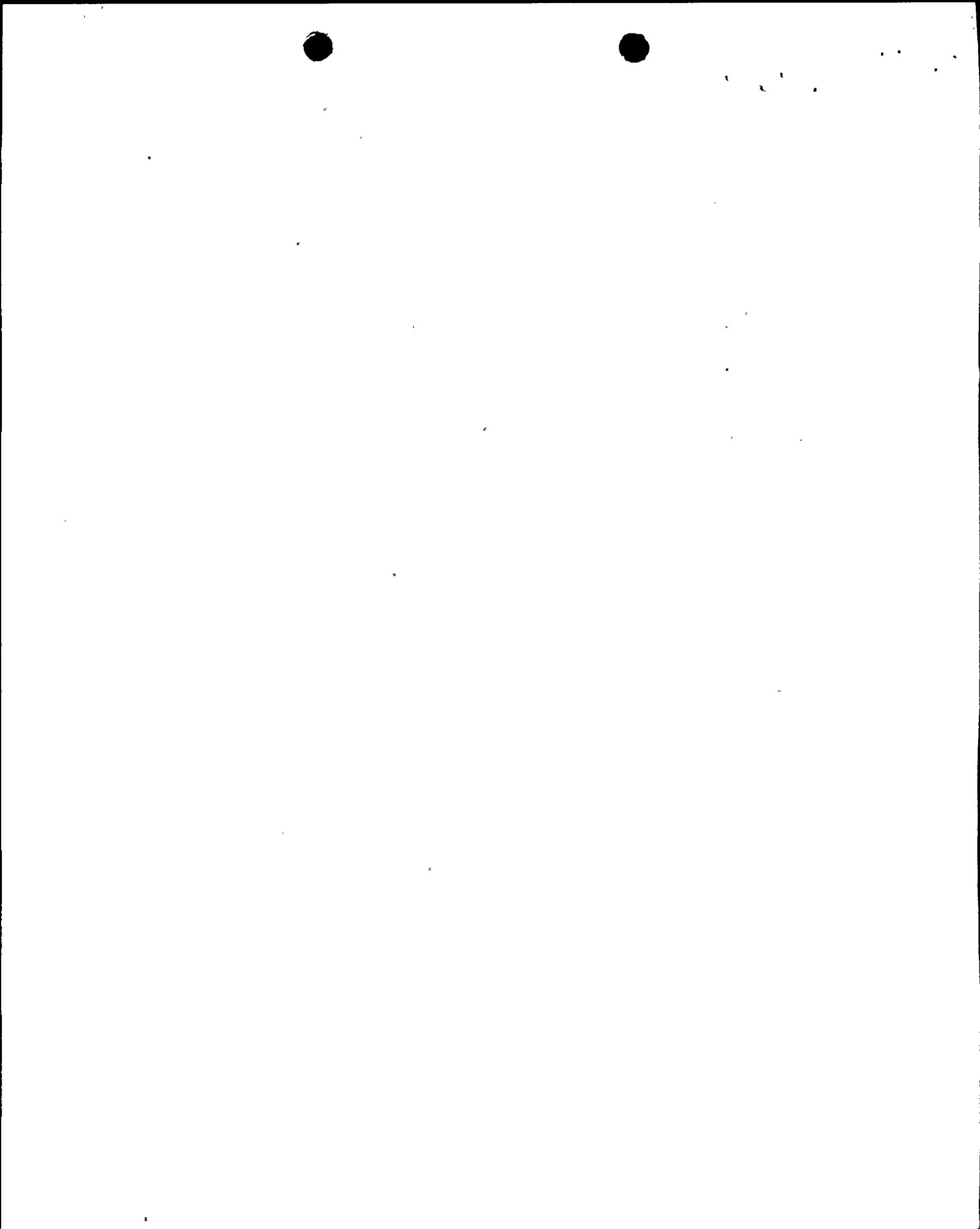


Brother Raphael Wilson
Chairman, EFSC



Lynn Frank
Director, ODOE

BW:LF:BD:aj/md
9054A
Attachment



9/11/80

EFSC/ODOE Response
to Additional PSR Concerns Regarding Potential Effects of
Mt. St. Helens Eruptions on Trojan

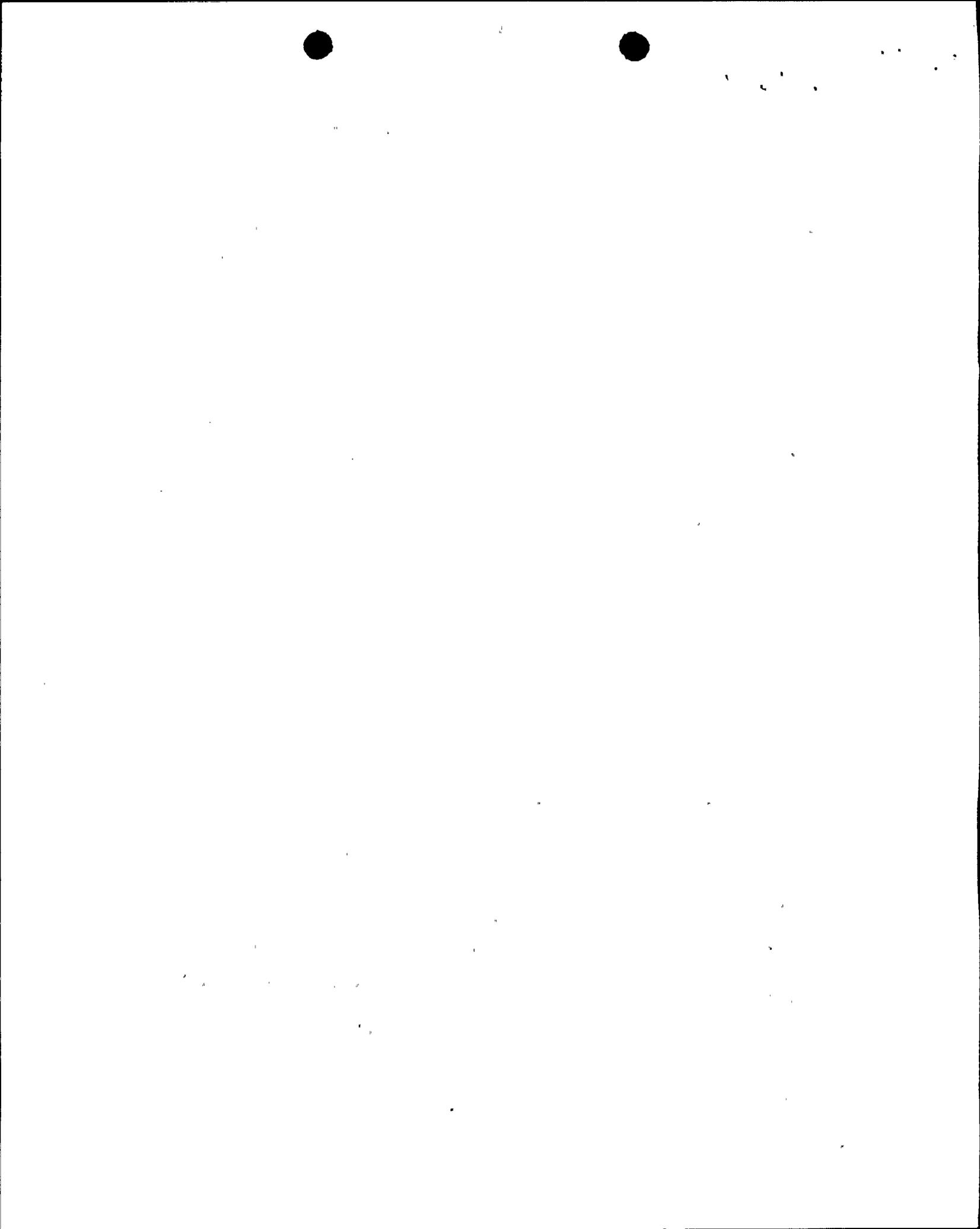
Background

At the April 1980 Energy Facility Siting Council (EFSC) meeting the Oregon Department of Energy (ODOE) staff presented an evaluation of the potential effects of a volcanic eruption of Mt. St. Helens on the Trojan Nuclear Plant. The ODOE staff concluded that Trojan had been adequately designed for volcanic hazards and that appropriate precautionary measures have been taken or will be implemented such that volcanic activity in conjunction with operation of Trojan does not present an undue risk to the public health and safety. Mt. St. Helens subsequently began experiencing major eruptions on May 18, 1980.

At the July 11, 1980 EFSC meeting Dr. Beth Packer of the Portland Chapter of the Physicians for Social Responsibility (PSR) petitioned EFSC to revoke the Trojan site certificate based on contentions that Trojan was not adequately designed to withstand the effects of volcanic eruptions and that the Trojan emergency response plan was inadequate.

In a letter to Dr. Packer on July 14, 1980, the EFSC Chairman stated that volcanic activity at Mt. St. Helens was being closely monitored to ensure that the safety of Trojan was not degraded. Regarding the PSR petition, he stated that EFSC had reviewed a detailed report prepared by ODOE staff on this subject. The ODOE staff report concluded that Trojan had been properly designed to prevent eruptions of Mt. St. Helens from causing an accident at Trojan. EFSC concluded that the ODOE staff report adequately responded to the PSR contentions. Further, the EFSC concluded that no breach of warranty or failure to comply with EFSC rules or site certificate conditions had been identified. The letter also noted that the ODOE Director concluded that a clear and immediate danger does not exist. The Chairman then encouraged Dr. Packer to provide EFSC with any further specific information she might have that ODOE staff did not adequately consider in the report.

In telegrams dated July 27, 1980 to EFSC and the ODOE Director, Dr. Packer again requested that Trojan be ordered immediately shut down due to volcanic activity of Mt. St. Helens. In a letter to Dr. Packer dated July 28, 1980, the ODOE Director stated that after consultation with the EFSC Chairman, both EFSC and ODOE concluded that the telegrams offered no substantive basis for reaching a conclusion different from the earlier EFSC and ODOE conclusion that no breach of warranty, failure to comply with EFSC rules or site certificate conditions had been identified or that a clear and immediate danger to the public does not exist.



At the August 8, 1980 EFSC meeting, Dr. Packer resubmitted the original PSR petition with additional signatures. The written petition contained no further contentions. However, in her oral presentation, Dr. Packer stated five reasons for resubmitting the petition. These reasons were related to alleged inadequacies in the ODOE staff report of July 14, 1980 and the manner in which it was prepared, and failure of the EFSC to do its duty by allowing the ODOE Director to unilaterally decide on the petition.

Dr. Michael Wall, PSR and Barbara LaMontecella, concerned citizen spoke in support of Dr. Packer's concerns.

Conclusion

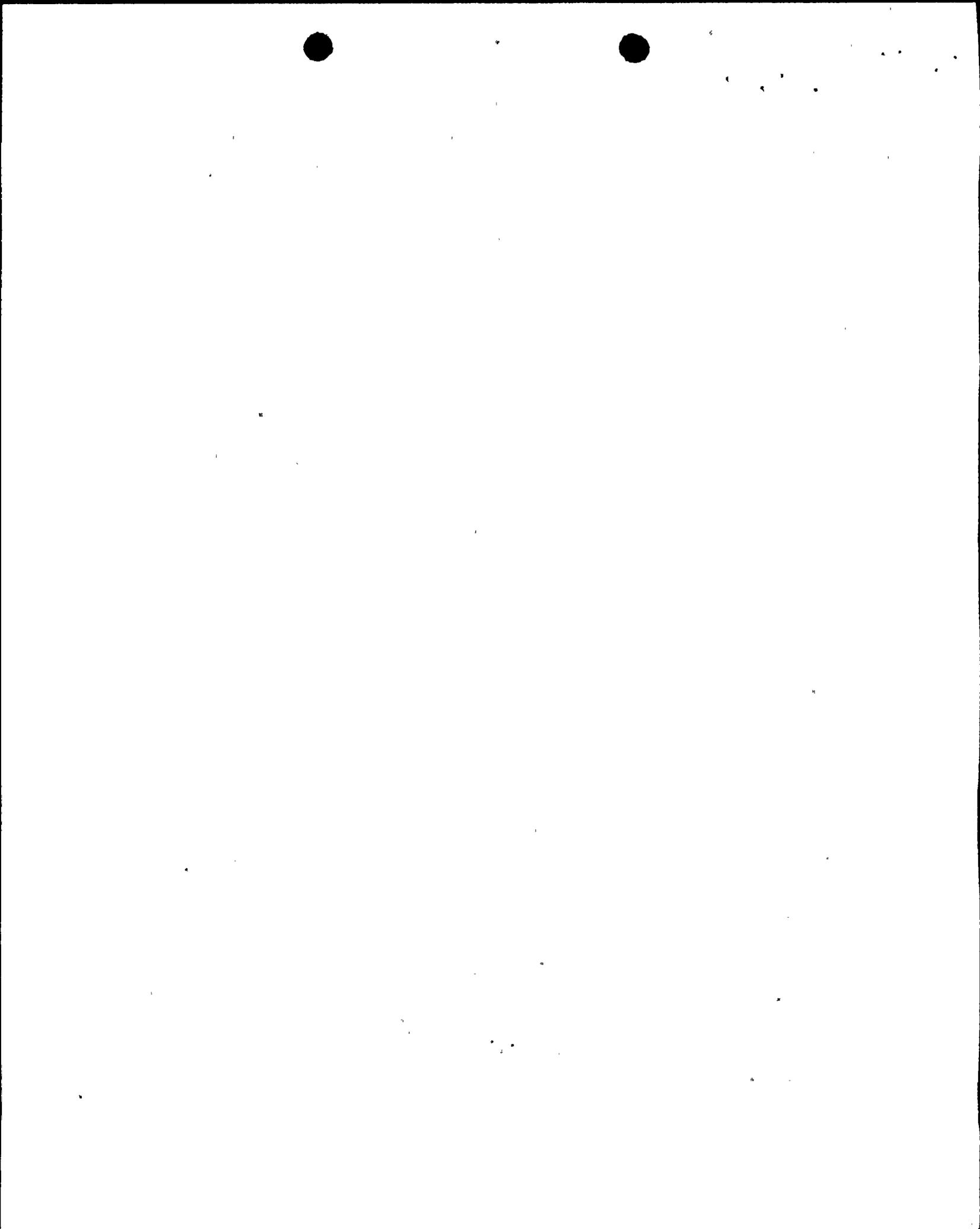
EFSC and ODOE have reviewed each of the PSR concerns and conclude that there is no substantive basis for reaching a conclusion different than that previously reached by EFSC and ODOE. On August 5 and 13, 1980, NRC responded to several similar petitions and concluded that "the Trojan site remains suitable from a volcanic hazards viewpoint." In a discussion on August 13, 1980, John Beaulieu, Deputy State Geologist, stated that both Donald Hull, State Geologist, and he continue to believe that the assessment of volcanic hazards assumed during Trojan design remains valid and conservative in view of the actual volcanic activity experienced and therefore they continue to support the earlier EFSC/ODOE conclusion.

Each of the PSR concerns are discussed separately in detail below. The following discussion also refers to the ODOE staff report of July 14, 1980. No information has been developed that would cause ODOE to change that report.

Contention 1: EFSC did not do its duty in evaluating the PSR petition but rather allowed the ODOE Director to unilaterally decide on the petition.

As stated at the July 11, 1980 EFSC meeting, EFSC requested the ODOE staff to prepare a detailed report documenting the earlier conclusions prior to startup of Trojan. The EFSC Chairman stated the report would be distributed to all EFSC members and that he would consult with each member prior to responding to PSR. The ODOE staff completed and delivered the report to the EFSC members on July 13, 1980. The EFSC Chairman consulted with the other EFSC members on July 14, 1980. In a letter to Dr. Packer dated July 14, 1980 the EFSC Chairman stated: "We appreciate your concerns and that you articulated specific areas that required review. We believe the staff has responded to them in their report." Regarding breach of warranty or failure to comply with EFSC rules or site certificate conditions, he stated: "Our reading of your petition did not identify any allegations that such conditions exist."

In response to the PSR telegrams of July 27, 1980, the ODOE Director stated: "I have reviewed this matter again with Brother Wilson. Your telegrams, while reaffirming your earlier concerns, offer no substantive basis for reaching a different conclusion."



At the August 8, 1980 EFSC meeting, the EFSC Chairman and other EFSC members clearly stated to Dr. Packer that they had reviewed this matter and reached the same decision separately from the decision of the ODOE Director.

The above discussion demonstrates that the EFSC reached its own conclusion on the petition.

Contention 2: The ODOE staff report of July 14, 1980 only addressed a simultaneous eruption and radiological accident. PSR intended the following cases be addressed:

- a. A radiological accident caused by an eruption.
- b. A radiological accident occurring simultaneously with, but not related to, an eruption.
- c. Evacuation around Trojan complicated by ashfall, mudflows, and flooding.

The ODOE staff report of July 14, 1980 stated that evacuation during or immediately after a major volcanic eruption with consequences in the vicinity of Trojan could be difficult but that appropriate protective action through either evacuation or sheltering would be possible. This statement applies regardless of whether a radiological accident is caused by an eruption or occurs simultaneously with, but is unrelated to, an eruption.

Regarding ashfall, local and state law enforcement and transportation officials in Washington who experienced the effects of the May 18, 1980 eruption state that although not desirable, it would be possible for people to travel in automobiles on roads during or immediately after a heavy ashfall. These officials likened the effects on road conditions of the May 18, 1980 eruption to be equivalent to or less severe than the effects of recent ice storms.

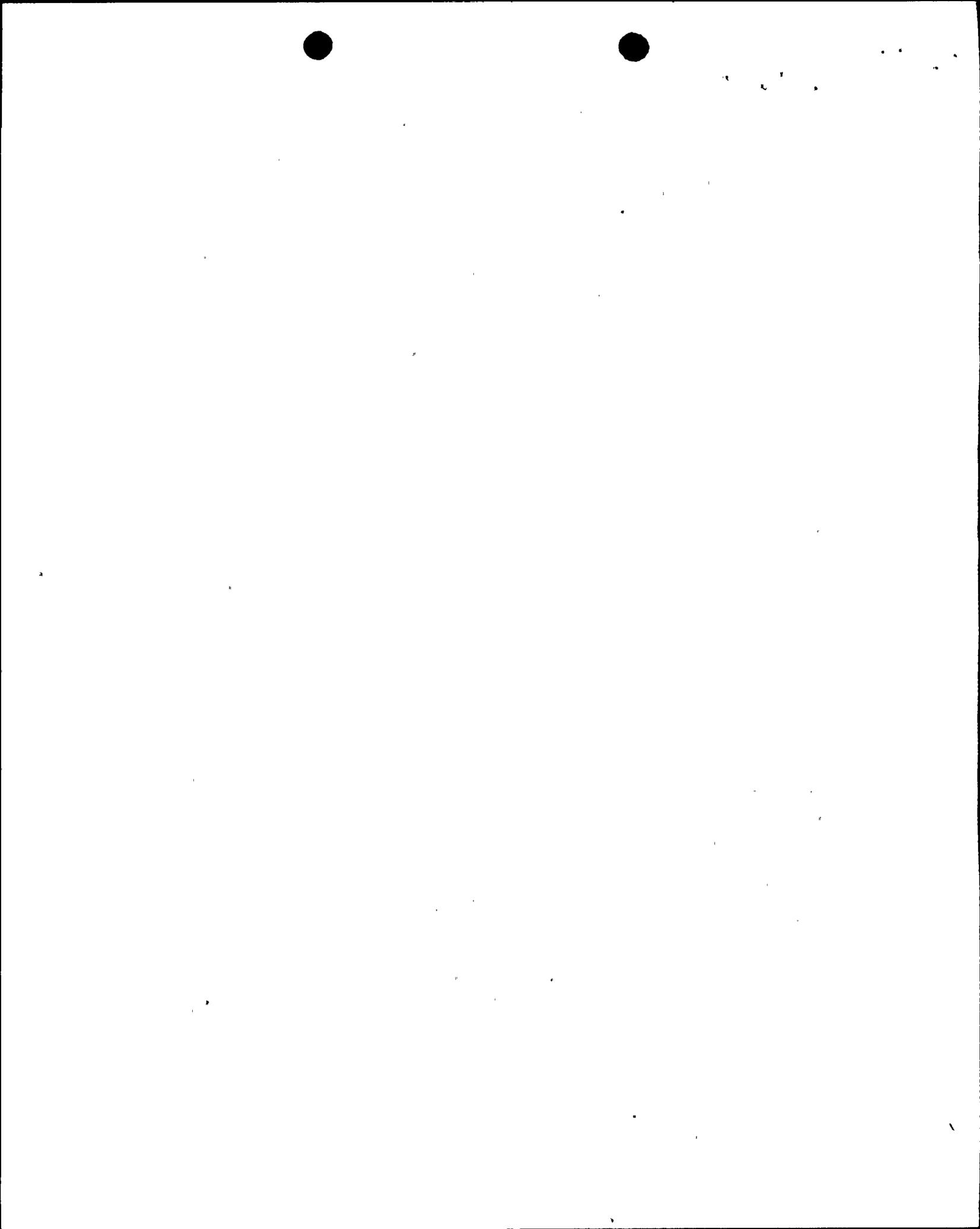
Regarding mudflows and flooding, these effects may also complicate evacuation but do not make it impossible. The basis for this statement results from an evaluation of the worst-case volcanic induced flood (which has wider area effects than mudflows). For the worst-case volcanic induced floods, (resulting from failure of all three dams on the Lewis River) local portions of Highway 30 and Interstate 5 south of Trojan and large portions of the Longview and Kelso areas could be flooded. However, Highway 30 and Interstate 5 north of Trojan and Highway 411 out of the Longview/Kelso area would remain open. In addition, most of the smaller roads leading away from Trojan would remain open. Therefore, if flooding and mudflows were to occur, they would not foreclose evacuation. As stated in the ODOE staff report of July 14, 1980, to minimize the probability and consequences of this worst-case flood, the water level of at least one of the reservoirs contributing to such flood has been lowered.



Based on the above discussion, evacuation during or immediately after a major volcanic eruption with consequences in the vicinity of Trojan could be difficult but not impossible. However, the discussion of evacuation under such circumstances does not recognize the small probability of a simultaneous accident and eruption or that other protective actions, such as sheltering, may be more appropriate than evacuation. For example, for a single puff release of radioactive noble gases, sheltering would probably result in less radiation exposure than evacuation under such circumstances since sheltering would provide less contact time and possibly better shielding.

As discussed in the ODOE staff report of July 14, 1980 the need to evacuate for radiological reasons during or immediately after an eruption is extremely unlikely for the following reasons:

1. Technical evaluations by ODOE, NRC, and PGE of the potential effects of an eruption upon Trojan conclude there should be no adverse effects upon plant operation.
2. In the event an eruption does affect Trojan operation, the plant can be safely shut down. ODOE and NRC monitor plant operations to ensure appropriate actions are taken.
3. In the event of an eruption that has severe effects in the Trojan area, PGE may decide to shut down Trojan due to the lack of need for power since industrial users may not be operating or difficulty that Trojan employees may experience in driving to the plant.
4. In the event that a radiological accident occurs at the same time or immediately after an eruption, all specific details at that time would be evaluated to determine what, if any, protective actions will be taken. The specific details include the amount, type, and duration of radioactivity released from the plant (if any); the stability of plant conditions and likelihood of future releases; meteorology; population density in direction of release; and road conditions. If protective actions are required, the actions will be chosen on the basis of minimum risk. For the unlikely conditions postulated by PSR, sheltering would probably be chosen as the protective action in lieu of evacuation since:
 - a. evacuation could be complicated by the effects of an eruption upon transportation,
 - b. sheltering is an effective protective action to reduce radiation exposures,
 - c. in general, because of ashfall, people would already be indoors with the windows and doors closed.



Contention 3: The ODOE staff report of July 14, 1980 was hastily drawn up and only the ODOE Director made the decision on the PSR petition.

This contention is similar to contention 1 and therefore the above response applies. Further, ODOE, EFSC, NRC, and PGE began evaluating this subject up to nearly two months prior to the first major eruption on May 18, 1980.

Contention 4a: The ODOE staff report of July 14, 1980 only considered evacuation complicated by ashfall. The complicating effects of mudflows, flooding, food control, and fires need to be considered. The annual evacuation drill should simulate these effects.

This contention is similar to contention 2 and therefore the above response applies. The control of radioactively contaminated foodstuffs could be complicated by the effects of an eruption. On the other hand, the disruption effects of such an eruption would tend to help prevent movement of contaminated foodstuffs to the market. However, as stated above, a simultaneous eruption and radiological accident (especially one releasing large amounts of radioactivity from the plant that would require large-scale control of foodstuffs) is unlikely. The effects of fires in such an event would probably be small and localized. Further, this risk is always present at any other time.

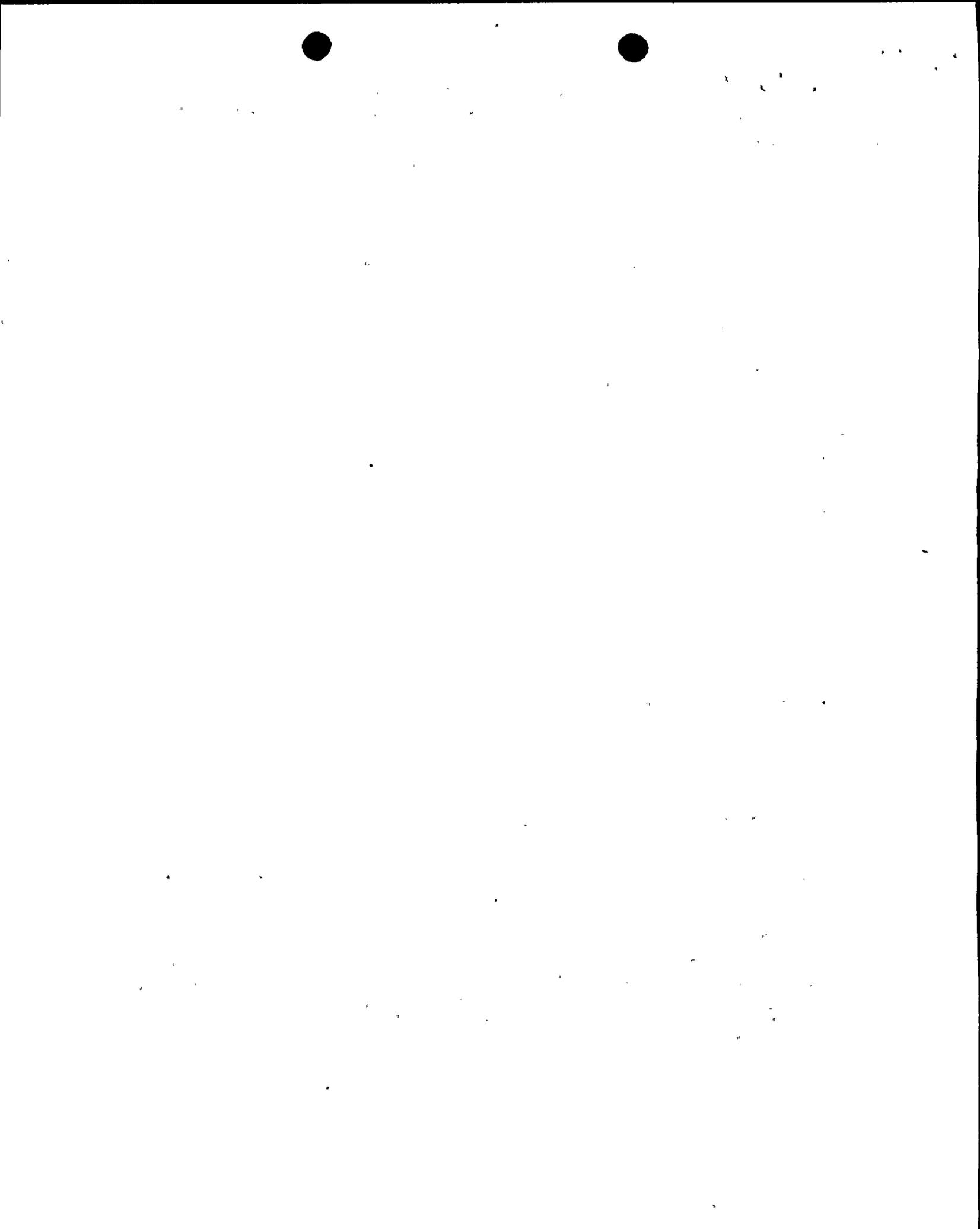
The annual emergency response drill has in the past simulated evacuations. Future drills will include simulation of events which tend to complicate evacuation and of alternate protective actions, such as sheltering, which may be more appropriate.

Contention 4b: The ODOE staff report of July 14, 1980 states that during a simultaneous eruption and radiological accident evacuation of people could be difficult. Would evacuation be difficult or impossible?

This contention is similar to contentions 2 and 4a and therefore the above responses apply. Evacuation under such circumstances would be difficult but not impossible. However, even in these extremely unlikely circumstances, sheltering would probably be chosen as the protective action since it would result in the least risk and in some cases would be the preferred course of action to minimize radiation exposure.

Contention 4c: The ODOE staff report of July 14, 1980 states that in the unlikely event of loss of cooling water from the intake structure that adequate cooling can be maintained by backup means. Can adequate cooling be provided for both the reactor core and spent fuel pool simultaneously using the backup means?

Yes. The statement on page 10 that "adequate cooling can be provided for a minimum of 165 hours (nearly a week) by the circulating water system and the cooling tower basin" applies to all simultaneous heat sources.



Contention 4d: The FSAR didn't consider the possibility that a downstream river (the Cowlitz River) could affect the river bottom at Trojan. What effect does the observed 15-foot decrease in river depth have upon the FSAR flooding analyses? Is it valid to predict the effects of future eruptions when the river contour may be continually changing?

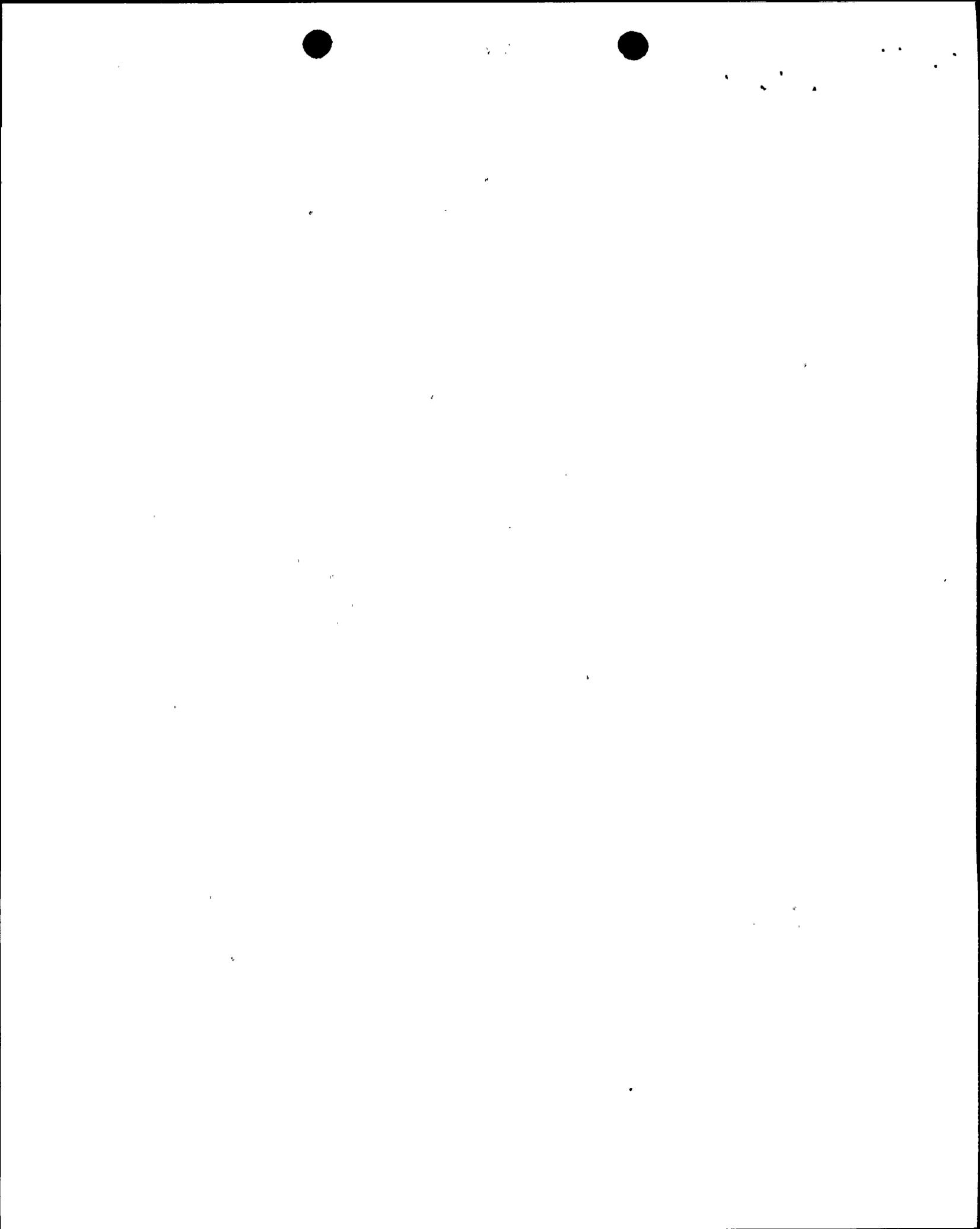
While the FSAR did not consider the possibility that a downstream river could affect the river bottom at Trojan, the FSAR addressed a more severe case of flooding and mudflows from an upstream river. Therefore the conclusions in the FSAR are valid and conservative. The FSAR concluded safe operation of Trojan would not be degraded by volcanic induced flooding and mudflows.

The effect of the change in the Columbia River bottom contour as a result of the May 18, 1980 eruption has been evaluated. This evaluation concludes that the effect upon the flooding analysis and results contained in the Trojan FSAR is negligible and therefore the FSAR remains valid.

In general, the Columbia River basin in the vicinity of Trojan has a wide flood plane (several miles wide). For floods around Trojan, the limiting restriction occurs about 2 miles downstream at Carroll's Bluff. The flood plane at Carroll's Bluff at an elevation sufficient to cause flooding at Trojan is greater than 1 mile wide. The cross sectional area at this point has been increased slightly from that assumed in the FSAR flooding analysis due to improved measurements and additional dredging since the FSAR flooding analysis was done in the early 1970's and has been decreased slightly due to deposition of mud and silt from the May 18, 1980 eruption. At the worst time after the May 18, 1980 eruption, the cross-sectional area had a conservatively calculated net decrease of less than 1%. The cross-sectional area of the flood plane at Trojan also decreased less than 1%, indicating that the limiting area for flooding remains at Carroll's Bluff. These reductions are within the analytical accuracy and therefore are negligible. Dredging since the May 18, 1980 eruption has further reduced the magnitude of this effect.

In a discussion on September 5, 1980, George Holme, Chief District Hydrologist, Army Corps of Engineers stated that separate analysis done by them conclude that there is a negligible effect upon flooding along the Columbia River due to the observed bottom contour changes. Also, in a discussion on September 5, 1980, David Weiss, Hydrologist, U.S. Geologic Survey, agreed this conclusion appears reasonable. In a discussion on September 11, 1980, Donald Kuehl, River Forecast Center, National Weather Service, stated that separate analysis by them support this conclusion.

Regarding the effects of future eruptions on the river bottom contour and flooding at Trojan, it is not expected that subsequent eruptions will involve significantly greater effects than the May 18, 1980 eruption due to the large amount of material removed from Mt. St. Helens during that eruption and the resulting weak spots which would tend to channel future



major eruptions to the same area of the mountain for which much of the available material has already been removed. However, there are mudflows which did not enter the Columbia River which could enter it later due to subsequent eruptions or heavy precipitation. The Army Corps of Engineers is closely monitoring this situation and a significant change in the river bottom contour will be apparent since the deepwater ship channel will fill first thereby restricting ship traffic. As an overcheck, PGE is conducting monthly soundings of the river in the vicinity of Trojan.

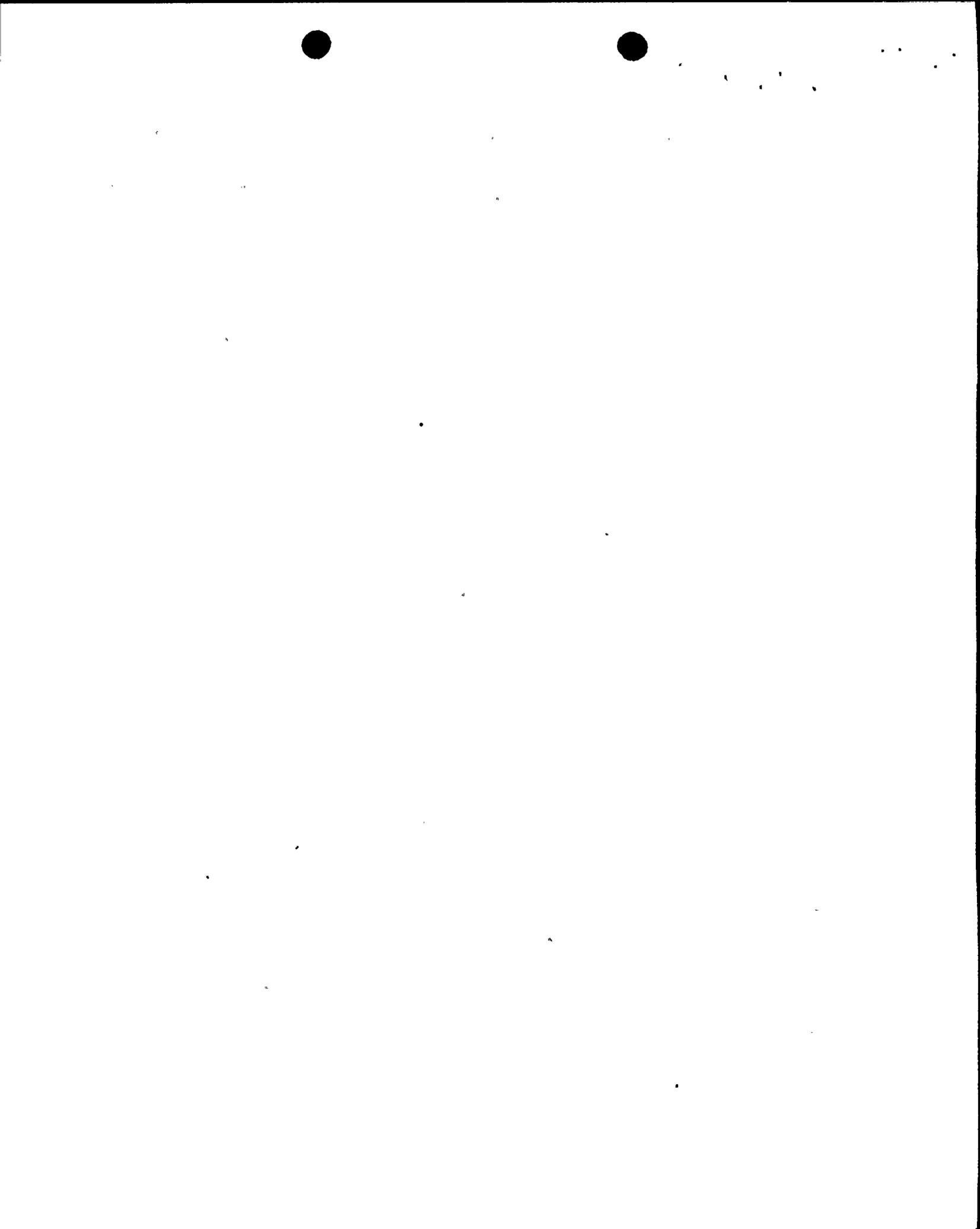
EFSC and ODOE will require PGE to evaluate the effects of future major changes in the Columbia River bottom contour upon the FSAR flooding analysis. If the results of the analysis are significantly altered by changes in the river bottom contour, PGE will be required to implement appropriate actions.

Contention 4e: PSR contends that the ODOE staff report of July 14, 1980 did not consider internal radiation exposure due to inhalation of ash that can be suspended and resuspended in air.

As discussed on pages 16 and 17 of the ODOE staff report of July 14, 1980, ODOE did consider internal radiation exposure due to inhalation of ash. Using the highest ash concentrations reported in the Portland area, ODOE calculated an initial internal dose rate of 0.0015 mrem/hour. ODOE noted that this dose rate would then decrease to insignificant levels. This decrease is due to the relatively short half lives (on the order of 30 minutes) of the significant dose-contributing isotopes and therefore the ODOE conclusion applies regardless of whether the ash settles or is continuously suspended in air. ODOE noted that use of masks would eliminate this source of radiation exposure.

Contention 4f: The ODOE staff report of July 14, 1980 states that during periods of impending or significant volcanic activity, PGE is immediately notified. PSR contends that this is not the case. Specifically, for July 22, 1980 changes in seismic activity were detected at 9 a.m., the eruption occurred at 5:13 p.m., and PGE was notified at 5:28 p.m. For August 7, 1980 changes in seismic activity were detected at noon, the eruption occurred at 4:26 p.m., and PGE was notified at 4:32 p.m. The report states that Trojan has not detected any seismic forces due to volcanic activity. The University of Washington in Seattle, 200 miles from Mt. St. Helens, has detected such seismic activity. Why doesn't Trojan equipment detect such activity?

The following is the notification chronology for the last two major eruptions:



<u>Date</u>	<u>Time</u>	<u>Event</u>	<u>Reference</u>
7/22/80	10:00 am	Series of shallow earthquakes detected	}
	2:00pm-5:00pm	Increasing frequency and magnitude of earthquakes	
			} Washington Department of Emergency Services (WDES) message to Federal Emergency Management Agency (FEMA) and Oregon Emergency Services Division (OESD)
	5:14 pm	Eruption to 45,000 ft.	}
	5:20 pm	Trojan notified of eruption by PGE	PGE (Zimmerman)
	5:35 pm	Trojan (Taylor) notified ODOE (Dixon) of eruption	ODOE Trojan Log
	5:35 pm	U.S. Forest Service (USFS) notified Oregon State Police (OSP) and OESD of eruption	OESD Incident Report
8/7/80	1:45 pm	USFS notified Trojan of increased seismic activity	PGE (Zimmerman)
	2:50 pm	Trojan (Yundt) notified ODOE (Dixon) of potential eruption	ODOE Trojan Log
	4:23 pm	Eruption to 44,000 ft.	WDES message to FEMA/OESD
	4:28 pm	USFS notified OESD of eruption	OESD Incident Report
	4:30 pm	USFS notified Trojan of eruption	PGE (Zimmerman)
	4:40 pm	PGE (Zimmerman) notified ODOE (Dixon) of eruption	ODOE Trojan Log



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Based on the above chronology, PGE is being notified of impending or significant volcanic activity. Oregon is also being notified on a timely basis by at least two separate sources.

Regarding detection of seismic activity at Trojan, the installed instruments are triaxial accelerometers which are designed to detect seismic forces at the plant-site as small as 0.01 g. An earthquake of this magnitude during the day would be felt indoors by many, outdoors by few. At night some people would be awakened. As stated in the ODOE staff report of July 1980 even though sizeable earthquakes occur on Mt. St. Helens, these have not been felt at Trojan due to the localized nature of volcanic seismic forces, the damping effect of the ground between Mt. St. Helens and Trojan, and the apparent sturdiness of the bedrock upon which Trojan is built. In discussions with John Beaulieu, Deputy State Geologist and Dick Couch, Associate Professor of Geophysics, Oregon State University, both men stated they are familiar with the type of equipment installed at Trojan, consider it appropriate for its intended function, and believe that it should not have detected any of the seismic forces from Mt. St. Helens.

Regarding the instrumentation at the University of Washington in Seattle, Beaulieu and Couch stated that a system of seismographs are installed throughout Oregon and Washington, including some in the vicinity of Mt. St. Helens, for which the measurements are transmitted to Seattle. These instruments have a sensitivity two orders of magnitude less than human detectability (down to 0.0001 g). Therefore they would expect the University of Washington in Seattle to detect seismic forces that Trojan does not. The U.S. Geological Survey has a similar system which feeds information to Menlo Park, California.

Contention 5a: PSR is concerned that the evacuation plan for the ten-mile radius around Trojan has not yet been approved by the NRC.

On August 19, 1980, NRC published a rule to become effective on November 3, 1980 that specified requirements for emergency response plans. The rule stated that within 60 days of its effective date, revised emergency response plans meeting these requirements must be submitted to NRC. The NRC must find these plans provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. By April 1, 1981 these revised plans must be implemented. Any deficiencies that still exist at that time must be corrected within four months.

Prior to adoption of this rule there were no specific requirements or NRC approval needed for emergency response plans.

While the plan and agreements as they exist today provide an adequate framework for responding to a Trojan radiological emergency revisions are being made to comply with the NRC rule and efforts will continue to make further improvements.



Contention 5b: PSR is concerned that the control building modifications have not yet been completed.

The control building modifications are being made to allow continued operation after an earthquake up to 0.15 g. Currently, the plant is required to shut down after an earthquake of 0.08 g. The Atomic Safety and Licensing Board, NRC, ODOE, and PGE all agree that adequate strength exists for Trojan structures and equipment so that a safe shutdown condition can be achieved and maintained following a large earthquake up to 0.25 g.

Therefore, the only significance of these modifications is that they will permit PGE to continue operating Trojan during and after larger magnitude earthquakes than they currently are permitted to do so. Even without these modifications, safe shutdown for large earthquakes is possible. This issue was addressed in the ODOE staff report of July 14, 1980 on page 5.

Contention 5c: PSR is concerned that on August 7, 1980 the red zone around Mt. St. Helens was expanded to 20 miles. Therefore, Trojan is only 11 miles away from the red zone. If the red zone was expanded another 5 miles, Trojan would only be 6 miles away from the red zone.

The size of the controlled access area around the volcano has no direct bearing on the safety of Trojan operation. The controlled access area has been periodically adjusted depending on recent or expected volcanic activity and to facilitate ease in access control. As discussed above, Trojan is advised of significant or impending changes in volcanic activity and takes appropriate actions.

Further, the information presented by PSR on the distance between Trojan and the red zone and the change to the red zone size are not accurate.

The PSR contention assumes Trojan is 31 miles from Mt. St. Helens. In actuality, the distance is approximately 34 miles.

Access around Mt. St. Helens is controlled in the Gifford Pinchot National Forest by the U.S. Forest Service (USFS) and in other areas by the Washington Department of Emergency Services (WDES). In a discussion on August 14, 1980, Paul Stenkamp, Director, Emergency Coordination Center, USFS, stated the following:

- a. On March 25, 1980, access was restricted (i.e., red zone established) above the timberline on Mt. St. Helens (2 to 3 mile radius).
- b. On April 30, 1980, access was restricted (i.e., red zone expanded) in all of Gifford Pinchot National Forest except the Mineral area. The radius of this restriction was up to 30 miles. (In the direction of Trojan, the restriction was about 16 miles.)



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- c. On June 4, 1980, the restriction was lifted (i.e., red zone reduced) for National Forest land north of Highway 12 (this had no effect on the restriction distance in Trojan's direction).
- d. On July 25, 1980, the restriction was reduced (i.e., red zone reduced) to about 14 miles in all directions. The recreational restriction zone (i.e., blue zone), which permits industrial activity but prohibits recreation, was also reduced accordingly to about 20 miles.

In a discussion on August 13, 1980 Ken Olsen, Red Zone Coordinator, WDES, stated the following regarding the state-imposed access restrictions (i.e., red zone):

- a. On April 1980, WDES restricted access to permit only permanent residents and emergency workers within 20 miles of Mt. St. Helens.
- b. On July 29, 1980, the restriction was reduced to about 16 miles from the volcano in Trojan's direction to allow access to Lake Merwin.
- c. WDES is currently considering further reductions in the restrictions.

Based on the above, it is apparent that the access restrictions around Mt. St. Helens have recently been reduced instead of increased as stated in the contention.

BD:aj/md
9054A





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

October 6, 1980

OFFICE OF THE
EXECUTIVE DIRECTOR
FOR OPERATIONS

Note to: Harold Denton
Director, NRR

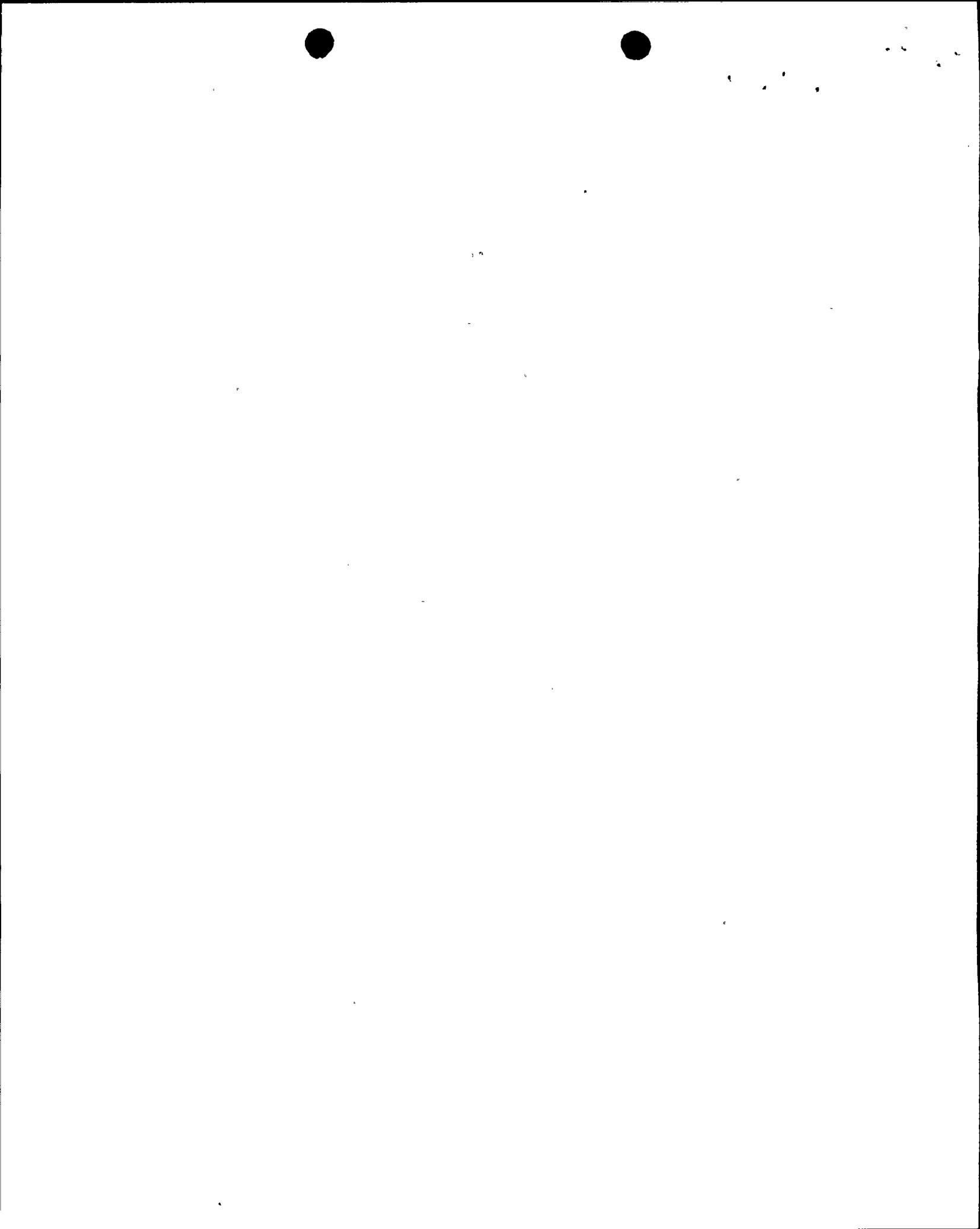
Harold:

I understand that FEMA has now released its views on this study. Could you pull together a short estimate of the significance of the FEMA analysis and this study regarding the California nuclear plants (operating and non-operating).

A handwritten signature in cursive script, appearing to read "Bill Dircks".

Bill Dircks/EDO

Enclosure
Note to Ahearne
fm Dircks dtd 8/19/80
w/att. NSC assessment
re earthquakes in Ca.





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

August 19, 1980

Note to: Chairman Ahearne

John: *attached*

In response to your question regarding the meeting on earthquakes in California, Harold Denton and I attended the meeting on July 30. There was a good representation of the various agencies at quite a high level: Clifford Alexander, Bo Cutter, and an Assistant Secretary of Defense, etc.

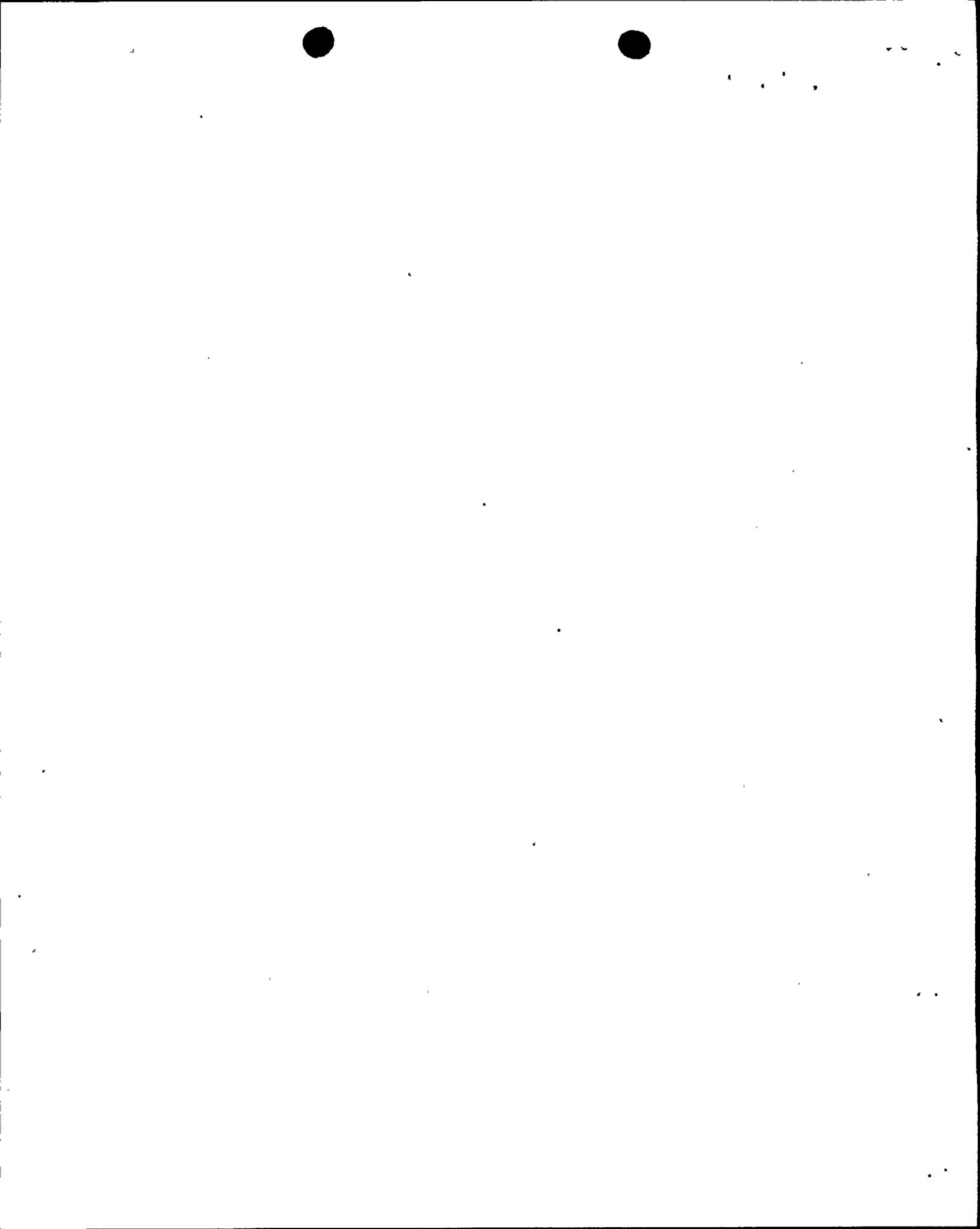
Harold gave a good summary of activities in the seismic area, answered several questions and generally covered the subject very well.

A copy of the assessment prepared by the NSC was given to us and I am enclosing a copy for your information. When you are finished with it, please return it to me for our files.

Bill

Bill Dircks
Acting EDO

Enclosure





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

IN RESPONSE
REFER TO SA80-138

October 9, 1980

OFFICE OF THE
SECRETARY

MEMORANDUM FOR: William J. Dircks, Executive Director
for Operations

FROM: John C. Hoyle, Acting Secretary

SUBJECT: DD-80-26, TROJAN NUCLEAR PLANT: DENIAL
OF 2.206 RELIEF TO TROJAN DECOMMISSIONING
ALLIANCE (SECY-A-80-138)
(COMMISSIONER ACTION ITEM)

This is to advise you that the Commission has decided not to review the Director's decision denying the Trojan Decommissioning Alliance 2.206 request. However, in view of the strong possibility of continued volcanic activity of Mount St. Helens over the next few years, the Commission believes that further consideration should be given by the Director to the problems of evacuation during or soon after an eruption. Therefore, the Commission directs the staff to more closely examine, in conjunction with the Trojan plant evaluation for compliance with the new emergency planning regulations, 45 Fed. Reg. 55402 (August 19, 1980, effective November 3, 1980), the problems of effective protective measures and evacuation during or soon after an eruption, giving due consideration to the possible effects of severe ashfall, mudflows, floods, and landslides.

cc:
Chairman Ahearne
Commissioner Gilinsky
Commissioner Hendrie
Commissioner Bradford
General Counsel
Director, Policy Evaluation
Director, Nuclear Reactor Regulation
Executive Legal Director
Chief, Docketing & Service Branch, SECY

CONTACT:
E. W. McGregor (SECY)
41410



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