

MAY 21 1981



MEMORANDUM FOR: Brian K. Grimes
Director, Emergency Preparedness Division
U.S. Nuclear Regulatory Commission

FROM: John E. Dickey
Director, Radiological Emergency Preparedness Division

SUBJECT: Comments on Public Information Brochure -- V. C. Summer

In response to your request of May 8, 1981, we offer the following comments on the public information brochure produced by South Carolina Electric and Gas for the subject facility.

General:

The brochure is well done. It presents the information in a brief, readable format, and the scope of the information meets all requirements. While the details of the evacuation plan have not been exercised, our Region IV review indicates the plan is workable.

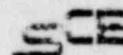
Suggested Changes for a Future Issue:

1. It would be instructive to add to the scope of the map the location of the reception center and the actual relocation center which, we understand, is a church convention center 15 miles from the facility.
2. We defer to NRC on contamination levels in the secondary loop, but we believe the utility overstates the level of cleanliness.
3. The table of low-level radiation contains a number of items in controversy. The level at which health effects can first be detected is probably lower than the number 25,000 MREM stated. Also, we question the practical value of listing an isolated value in Brazil which may or may not be inhabited. Also, we understand the maximum worker exposure limits to be different than stated.
4. The reference to the use of sirens fails to identify the specific 3 to 5 minute continuous tone required in NUREG-0654/FEMA-REP-1, Revision 1.

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ROBERT DIETCH
VICE PRESIDENT

May 18, 1981

TELEPHONE
213-572-4144

Mr. Alex R. Cunningham
Director, Office of Emergency Services
P.O. Box 9577
Sacramento, California 95823

Dear Mr. Cunningham:

The letter from Mr. Kearns of your office, to Mr. Grimes of the Nuclear Regulatory Commission, dated May 8, 1981, has recently come to my attention. I am also in receipt of Mr. Kearns' letter, dated May 11, 1981. Taken together, Mr. Kearns' letters suggest a misunderstanding of the facts and the long-standing spirit of cooperation between your office, the involved local jurisdictions, and this Company. As such, I feel a response is warranted to avoid any future misunderstandings.

Mr. Kearns' characterization of the procedure established by the Memorandum of Understanding between NRC and FEMA, effective November 4, 1980 (the "MOU") as an "extraordinary step" is misplaced. Although this subject is more appropriately addressed by the NRC, it is our understanding that the MOU has been invoked in all cases where the NRC has granted operating licenses since the involvement of FEMA in the licensing process. Furthermore, at the meeting between your office, NRC, FEMA, Orange County and this Company, on October 20, 1980, in El Segundo, California, Mr. Kearns agreed to cooperate with the MOU procedure and to participate in the FEMA/RAC review. Your Office has to date participated in this process without objection in a manner commensurate with the understandings arrived at between ourselves in the meetings in your office on November 21, 1980 and March 9, 1981. For this reason, Mr. Kearns' letter now objecting to the MOU procedure seems inconsistent with previous activities and understandings.

Of equal concern is Mr. Kearns' surprising allegation that your office has received no cooperation from this Company or from the counties in the preparation of the emergency plans for local jurisdictions in the area surrounding San Onofre. Our correspondence files dating from 1975 to the present reveal a dedicated, on-going effort by all involved parties to cooperate in complying with applicable State and Federal requirements in the area of radiological emergency planning and preparedness. Of particular significance is the fact that each of the involved jurisdictions in February of this year submitted to your office revised plans to meet Federal requirements. Since July of last year, each of the involved jurisdictions and

Mr. Alex R. Cunningham

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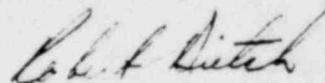
May 18, 1981

the Company have fully cooperated with your efforts to develop appropriate recommendations to the State legislature as required by Section 8610.5 of the Government Code. While there has been spirited discussion as to what those recommendations should be, these discussions have not impaired our spirit of cooperation as recognized in your letter of March 3, 1981. Beginning in September, 1979 and continuing to the present time, this Company has requested your involvement and has consistently kept you informed of all formal meetings and efforts to upgrade State and local planning to meet upgraded Federal requirements. Your representatives have participated as time and resources permitted. Your letter of February 28, 1980, recognized that your program to comply with Section 8610.5 of the Government Code would not impair this effort. The fact that this effort is now in its final stages is testimony to our joint cooperation, not any lack of it.

Given the current level of Company, State and local planning and the demonstrated capabilities of the participating State and local organizations observed during the exercise of May 13, 1981, I cannot agree with the implication of Mr. Kearns' position that proceedings for the licensing of San Onofre, Units 2 and 3, should await further development of State plans and procedures. Mr. Kearns' concern that an exercise of State and local radiological emergency preparedness was "premature," has hopefully been allayed by the beneficial experience obtained at the exercise conducted on May 13, 1981. I continue to believe that the pace of SCE emergency planning activities, including the exercise, is warranted because of San Onofre Unit 1 which is licensed to operate. Nevertheless, at your urging, we did delay the schedule for the exercise from its original date of April 14, 1981. I can agree with Mr. Kearns that emergency planning and preparedness is an on-going process of constant improvement and refinement. This Company, in cooperation with State and local government and Federal agencies, is committed to that process.

I trust these thoughts will be received in a positive manner and will enhance our ability to continue to work together toward our common goal of protecting public health and safety.

Very truly yours,



cc: Mr. Brian Grimes, NRC
Mr. John Dickey, FEMA
Mr. Francis Manda, FEMA, Region IX