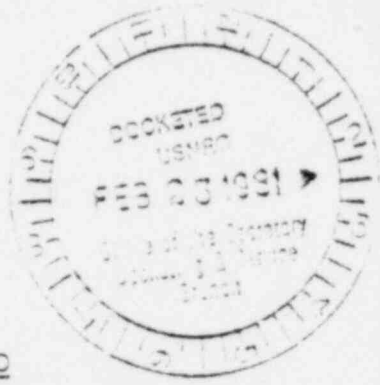


2/18/81



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

SOUTHERN CALIFORNIA EDISON COMPANY,
ET AL.)

(San Onofre Nuclear Generating Station)
Units 2 and 3)

) Docket Nos. 50-361 OL
) 50-362 OL

INTERVENOR, FOE ET AL., THIRD SET OF

INTERROGATORIES TO N.R.C. STAFF

Intervenors Friends of the Earth, et al, hereby requests that the N.R.C. Staff, pursuant to 10 CFR §2.740(b) answer, separately and fully, in writing under oath or affirmation, the following interrogatories within fourteen (14) days after service hereof. Each response to the interrogatories below shall be under oath or affirmation of the individual who contributed thereto. For all references requested in these interrogatories, identify them by author, title, date of publication and publisher, if the reference is published, and if not published, identify the document by the author, title, the date it was written, the qualifications of the author relevant to this proceeding, and where a copy of the document may be obtained.

The interrogatories set forth below are to be considered N.R.C. Staff's continuing obligation. Accordingly, if, after the N.R.C. Staff has answered these interrogatories, additional information comes to their attention with respect to one or more of the answers

the answers should be amended in a timely manner to provide such additional information.

1. State whether the N.R.C. (or F.E.M.A.) will require the state and local governments, and other off site assist agencies, to consider the impacts of a major earthquake upon their emergency response plans.
2. If the answer to the foregoing interrogatory is in the negative, state how these emergency plans will be adequately coordinated and integrated in order to protect the public health and safety in the event of a major earthquake.
3. If the answer to interrogatory number 1 is in the affirmative, state whether the N.R.C. (or F.E.M.A.) will direct the state and local governments to revise their emergency plans to include the possible impacts of a major earthquake upon transportation routes, communications systems, medical facilities, etc.
4. If the answer to the foregoing interrogatory is in the affirmative, state when the N.R.C. (or F.E.M.A.) will direct the state and local governments to revise their plans.
5. Is the N.R.C. of the position that an earthquake which exceeds SSE levels will cause damage to more than one reactor located at the same site?
6. If the answer to the foregoing interrogatory is in the affirmative, state whether the N.R.C. has directed applicants to evaluate the possible effects of a "simultaneous release", as defined in 10 CFR 100.10.
7. If the answer to interrogatory number 5 is in the negative, state the N.R.C. position on the issue of "simultaneous release"

caused by a major earthquake.

8. State whether F.E.M.A. has approved the emergency plans of any of the following jurisdictions:

- a) Orange County Dep't. of Health
- b) San Diego County O.D.P.
- c) State O.E.S.
- d) City of San Clemente
- e) City of San Juan Capistrano
- f) State Parks and Recreation Dep't.
- g) U.S. Marine Corps, Camp Pendleton

9. State whether the emergency plans of any of the following jurisdictions have been found to be adequately coordinated and integrated with applicants and other off-site agencies:

- a) Orange County D of H
- b) San Diego County O.D.P.
- c) State O.E.S.
- d) City of San Clemente
- e) City of San Juan Capistrano
- f) State Parks
- g) U.S. Marines

10. State whether applicants will be required to conduct an emergency response exercise with state and local governments designed to test the integration and coordination of the emergency response plans.

11. If the answer to the foregoing interrogatory is in the affirmative, state with specificity the requirements of such an exercise.

12. State whether applicants will be required to have an adequate public warning system installed and working prior to N.R.C. approval of applicants emergency plan.
13. If the answer to the foregoing interrogatory is in the negative, what is the N.R.C. schedule for implementation of such public warning system.
14. State the schedule for implementation of the NUREG 0654, Appendix II required meteorological instrumentation and procedures.
15. State the schedule for implementation of the required radiological monitoring systems.
16. State whether applicants have provided a Public Information and Education plan as required by NUREG 0654, Section G.
17. If the answer to the foregoing interrogatory is in the affirmative, provide a copy of such plan.
18. If the answer to interrogatory number 16 is in the negative, state the schedule for implementation of the NUREG 0654, Section G required plan.
19. State with specificity how the N.R.C. will test the adequacy of the applicants Public Information and Education plan.
20. Is the N.R.C. of the position that an independent review of the emergency plans every two years adequately protects the public health and safety?
21. If the answer to the foregoing interrogatory is in the affirmative, state whether any studies or investigations have been performed to determine the turn-over rate of personnel involved in the emergency response.

22. If the answer to the foregoing interrogatory is in the affirmative, state:

- a) the name, address, capacity and occupation of each person making such study or investigation;
- b) the date or dates of such study or investigation;
- c) whether any reports of such person or persons were reduced to writing;
- d) in whose possession or custody such reports presently repose;
- e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and
- f) a summary of the findings of each study and investigation and the basis for such findings.

Dated: February 18, 1981

By /s/ Richard J. Wharton
Richard J. Wharton
Attorney for Intervenors
F.O.E. ET AL.

CERTIFICATE OF SERVICE

I hereby certify that on the day of February, 1981, a copy of the foregoing INTERVENOR, FOE ET AL., INTERROGATORIES TO N.R.C. STAFF, Attorney RICHARD J. WHARTON, was served upon each of the following by depositing in the United States mail, first-class, postage prepaid, addressed as follows:

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DATED: February 1981

/s/
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FRIENDS OF THE EARTH, ET AL.