

At the time of our filing of July 29, 1981, the Board had in hand the June 11, 1981 memorandum to it from Darrell G. Eisenhut of the NRC Staff. That memorandum transmitted to us a copy of the May 13, 1981 letter from Robert L. Tedesco of the NRC Staff to Mr. Robert Dietch and Mr. D. W. Gilman (Vice-Presidents of Southern California Edison Company and San Diego Gas and Electric Company, respectively). That letter set forth in detail the Staff's view of the matters to be considered by the Applicants concerning the evaluation of the effect of earthquakes on their emergency plans. Specifically, the Board noted that the Applicants were told, "For purposes of this evaluation, as a planning basis you may assume that the plant experiences earthquake effects no more severe than the Safe Shutdown Earthquake." The Board Order of July 29, 1981 stated our reasons for postulating an earthquake in excess of the SSE and we are not swayed from that position.

502

8108110499 810807 PDR ADDCK 05000361 0 PDR We have listened to oral arguments concerning our Order and have received written memoranda from the parties. Our concerns still focus upon the questions we raised in the Order, namely, "What steps could be taken by the Applicants and responding jurisdictions to carry out evacuation in a timely manner and/or protect those in the EPZ pending evacuation" following a damaging earthquake.

It now appears, however, that the Board order of July 29, 1981 may have posed such severe consequences resulting from the hypothesized earthquake that evacuation and/or protection of those in the EPZ would be virtually impossible. That was not our intention. The Board's intent was a site specific inquiry to examine the impact of a major earthquake, accompanied by a radioactive release, upon the emergency plans. The Board does not know what magnitude earthquake would be required to cause a "breach of containment" and "collapse of br iges and overpasses and surface breaks rendering the highways temporarily impassable." We therefore present the following revised issue:

Assume a major earthquake in the SONGS area. This assumed earthquake causes extensive structural damage to the facility, to communications, to highways designated as evacuation routes, and is accompanied by radiological releases requiring evacuation in the plume exposure pathway of the EPZ. In these circumstances what steps could be taken by the applicants and responding jurisdictions to carry out evacuation in a timely manner and/or protect those in the EPZ pending evacuation? What federal resources, including military resources, could be brought in to assist in this situation, and how would federal assistance be accomplished?

2

In posing the foregoing the Board wishes to learn what the physical consequences of earthquakes, in a scale of increasing severity beyond the SSE, would be upon the emergency plans as they relate to communications and evacuations up to some presumed point where evacuation would become a physical impossibility in any reasonable time frame. A point of beginning should relate to the presumed consequences of an SSE magnitude earthquake upon evacuation and the necessary related communications and highways. Pursuant to the Staff's earlier instructions, planning for such an earthquake presumably either is complete or in progress. Sequentially, from that level of planning, we wish to examine e presumed consequences of a series of increasingly more severe earthquakes as they relate to the emergency plans. Our questions are designed only to test the adequacy of the energency plans and to determine whether there is reasonable assurance that adequate protective measures can and will be taken at SONGS in the event of a major earthquake accompanied by radiological releases severe enough to initiate the energency evacuation plan.

> FOR THE ATOMIC SAFETY AND LICENSING BOARD

James L. Kelley, Chairman ADMINISTRATIVE JUDGE

Dated at Bethesda, Maryland this 7th day of August 1981.

cc: Chairman Palladino Commissioner Gilinsky Commissioner Bradford Commissioner Ahearne L/onard Bickwit, Jr., GC 3