

NUCLEAR REGULATORY COMMISSION

ATOMIC AND SAFETY 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
and 50-362 OL

DATE: August 26, 1981

PAGES: 7399-7622

AT: Anaheim, California

TRO1
3

0/1

ADD:

M. MOE 881 SS

J. Milhdan H-1007

J. SEARS AR-5011



ALDERSON  REPORTING

400 Virginia Ave., S.W. Washington, D. C. 20024

Telephone: (202) 554-2345

8109030192 810826
PDR ADOCK 05000361
PDR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

-----X
:
In the Matter of: :
:
SOUTHERN CALIFORNIA EDISON COMPANY, et al. : Docket Nos.
: 50-361 OL
(San Onofre Nuclear Generating Station, : 50-362 OL
:
Units 2 and 3) :
:
-----X

Grand Ballroom Salon J-K
Marriott Hotel
700 W. Convention Way
Anaheim, California

Wednesday,
August 26, 1981

Evidentiary hearing in the above-entitled
matter was resumed, pursuant to adjournment, at 9:15 a.m.

BEFORE:

JAMES L. KELLEY, Chairman,
Atomic Safety and Licensing Board

DR. CADET H. HAND, JR., Member

MRS. ELIZABETH B. JOHNSON, Member

1 APPEARANCES:

2 On behalf of the Applicants, Southern California
3 Edison, et al:4 DAVID R. PIGOTT, Esq.
5 EDWARD B. ROGIN, Esq.
6 SAMUEL B. CASEY, Esq.
7 Orrick, Herrington & Sutcliffe
8 600 Montgomery Street
9 San Francisco, California 9411110 JAMES BEOLETTO, Esq.
11 General Counsel
12 Southern California Edison Company

13 On behalf of the Nuclear Regulatory Commission Staff:

14 RICHARD J. HOEFLING, Esq.
15 DONALD HASSELL, Esq.
16 Office of the Executive Legal Director
17 U.S. Nuclear Regulatory Commission
18 Washington, D.C.19 HARRY ROOD
20 Project Manager
21 San Onofre Units 2 & 3

22 On behalf of the Intervenors, GUARD, Carstens, et al:

23 PHYLLIS M. GALLAGHER, Esq.
24 1695 West Crescent, Suite 222
25 Anaheim, California 9280126 CHARLES E. MC CLUNG, JR., Esq.
27 Fleming, Anderson, McClung & Finch, Inc.
28 23521 Paseo de Valencia, Suite 308A
29 Laguna Hills, California 92653

C O N T E N T S

	<u>WITNESSES</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RE CROSS</u>
3	Eugene N. Cramer				
4	by Mr. Pigott	7434			
5	by Mr. McClung		7448		
6	by Mr. Hoefling		7559		
7	Kenneth P. Barr				
8	by Mr. Casey	7587			
9	by Ms. Gallagher		7593		
10	<u>EXHIBITS</u>	<u>FOR INDENTIFICATION</u>		<u>IN EVIDENCE</u>	
11	Applicants' Exhibits:				
12	66				7439
13	68 - 77				7439
14	114				7439
15	123 - 130				7439
16	67				7440
17	79				7741
18	78,80,81				7442
19	131		7487		7488
20	121				7526
21					
22					
23					
24					
25					

P R O C E E D I N G S

(9:15 a.m.)

1
2
3 JUDGE KELLEY: We are back on the record. The first
4 item we want to speak to this morning is the pending motion for
5 continuance that was argued yesterday.

6 The motion essentially is to postpone the beginning
7 of the hearing until two weeks from now. We are denying that
8 motion. We don't believe that good cause has been shown for
9 such a continuance.

10 A principal reason assigned the requested con-
11 tinuance is the withdrawal of Mr. Wharton from the case and the
12 consequent additional burden falling on Ms. Gallagher and
13 Mr. McClung as a result.

14 We don't think that that development warrents the
15 kind of continuance that is requested. As of the 10th of July
16 when we issued the final prehearing conference order in the case,
17 it was contemplated that there would be a rough split of issues
18 between Mr. Wharton on the one hand and the GUARD counsel on
19 the other.

20 However, it was apparent toward the end of the seis-
21 mic hearing that the Carstens interest had focused on the EP2
22 size contention and the Board's issue concerning large earth-
23 quakes and I believe Mr. Wharton said on the record that they
24 would not participate in other issues.

25 In any event, it was clear some time ago that

1 Mr. Wharton's participation would be limited and our order of
2 July 10th certainly assumes effective communication between
3 counsel with regard to matters of that sort.

4 A reason related to Mr. Wharton's withdrawal is the
5 rather late-formed issue of the size of the EPZ, an issue in
6 which the Carstens group and Mr. Wharton did themselves propose
7 and did at one point wish to litigate.

8 In that regard, we haven't yet set a testimony due
9 date on that question. Similarly we haven't put a due date on
10 the Board's earthquake issue and those are things that we should
11 set very quickly but we haven't done it yet so it doesn't seem
12 to us that the continuance requested here has much to do with
13 those issues.

14 Right now all that the GUARD counsel are being asked
15 to do is cross examine on the Applicant's affirmative case on
16 the remaining issues. These issues have been known since
17 July 10th and most of these issues have been raised at GUARD's
18 instance in the first place.

19 The Applicant's testimony was served on August 3
20 and August 17. Compared to the seismic, at least, it is not
21 very technical material, so that we think there has been ample
22 opportunity to prepare and to go forward at this time.

23 Finally let me just add that with regard to
24 Mr. Wharton's not being available for this phase of the case,
25 you don't have to pursue all the areas that you thought

1 Mr. Wharton was going to pursue. You are perfectly free to
2 abandon a contention.

3 The Applicants in this case have put in their af-
4 firmative case on all the issues. The Board is reading or has
5 read this material. If we find something in there that we
6 think presents a serious safety issue that you don't want to
7 pursue, we will pursue it, so it isn't as if it is being left
8 without the Board's scrutiny and, in addition, either the Staff
9 or FEMA has reviewed it, so it is not something that has gone
10 without scrutiny beyond the Applicant, even if you don't pursue
11 it.

12 A couple of other comments about your motion. On
13 page 2 you refer to a hearing on July 10, 1981 and note --
14 looking at the second sentence in the bottom paragraph --
15 Attorneys for Intervenor GUARD were not present at the July 10
16 hearing. It wasn't a hearing.

17 All that was was an announcement of some Board
18 decision based on prior-filed paper, based on the conference of
19 June 18th, so it wasn't that you missed out on an opportunity
20 to present argument or present facts or present new paper. That
21 is what that was.

22 Commenting on page 3, paragraph 4, the certification
23 question and you are raising a question of uncertainty whether
24 you will be permitted to put on testimony on this issue, I think
25 we had a lot of clarification on that yesterday. It is my

1 understanding that the Applicants not only stand ready but are
2 now preparing their case on the Board's issue?

3 MR. PIGOTT: We are doing studies necessary to meet
4 that issue if necessary.

5 JUDGE KELLEY: So that we just didn't know before
6 we came out, because we hadn't seen the certification request,
7 whether -- well, we didn't know there was a question of whether
8 we would go ahead or not and then we didn't have a chance to
9 talk about it and now we are talking about it. The Applicants
10 say what they want is certainty and they are prepared to go for
11 certification and try the issue.

12 So we want to hear the issue so I don't think there
13 is any real uncertainty about your opportunity to be heard on
14 the issue too. The question, then, is what is the due date for
15 putting in papers and we can establish that.

16 MR. PIGOTT: I should probably be more clear. We
17 are preparing to meet the issue. We are not prepared to meet
18 the issue.

19 JUDGE KELLEY: I understand.

20 MR. PIGOTT: Right.

21 JUDGE KELLEY: That is what I understood you to
22 mean. Well, I think those are the major reasons. I might add,
23 too, that a continuance request is in large measure, a question
24 of the comparative convenience of the parties and it is obvious
25 from the people and the papers in the room that a great deal

1 of time and effort has gone into getting us all here this week
2 to begin to hear this case.

3 It would take a very strongly showing to turn around
4 and go home and we just don't think we have seen that, so we
5 will propose to go ahead.

6 Now having said that about the immediate continuance
7 request, we are prepared to consider possible options with
8 reference to the next session and with reference to filing times.
9 We know, for example, that the pace of yesterday was considerably
10 faster than the pace of hearing witnesses down in San Diego.

11 I wonder, Mr. Pigott, whether it is going to take
12 you until a week from Friday to get through the witnesses that
13 you have prepared testimony for. I don't think any of us know,
14 but there is at least a question of whether it will take that
15 long.

16 MR. PIGOTT: There is no question that the pace is
17 faster than we previously experienced. The problem has been
18 getting people to the location on an accelerated schedule and
19 also we are looking now at what local officials may be available
20 come next week.

21 We don't anticipate, unless Intervenors can advise
22 the proceeding generally that they anticipate significantly
23 more cross examination than we have experienced, we don't anti-
24 cipate that it will take beyond the end of this week to go
25 through the prepared direct testimony.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

There are a few other witnesses, but I think it is our obligation to try and go through our case first, so we are working now to have the locals, as we call them, available as soon as possible.

Given the present pace, there may be some dead time around Saturday. I somehow or other have a bit of a problem visualizing people not otherwise involved in here to testify on Saturday, so I am more or less targeting their start for next Monday and it is therefore possible, given the pace we have seen before, that we may experience a little dead time toward the end of this week.

///

1 JUDGE KELLEY: This is what we had in mind, and
2 I address this to all counsel. It really is hard to say how
3 this is going to move along this morning, but come Friday
4 afternoon we might have a better idea.

5 What we would like to suggest, subject to better
6 suggestions from any of you, is that we set a close of
7 business Friday discussion of where we are and where we can
8 get and so forth. That would bear on due dates for submis-
9 sion of EPZ testimony, of earthquake testimony I will call it.

10 I might mention as a factor, not controlling
11 certainly, but we have checked on the availability of this
12 space later on, and we learned earlier that it wasn't
13 available on the 14th. It does happen to be available on
14 the 21st and for two weeks thereafter.

15 Now we may have to fish or cut bait on that
16 pretty soon, but as of yesterday it was, and so that -- if
17 it is a matter of convenience for counsel, we have got an
18 alternate possibility not too far away, but it is I daresay
19 not quite as favorable as some aspects of this place. We
20 don't particularly want to move because the public and the
21 press and others get the idea that it is at the Mariott
22 and lo and behold we are down at the Holiday Inn, and it is
23 not a good thing to do if you can avoid it.

24 And we certainly don't want to move twice. So,
25 that is a factor. I wonder too if -- I don't know, Mr. Perry,

1 if you can speak to it this morning, but whether -- would
2 you have a single witness, Mr. Naumann?

3 MR. PERRY: That is correct, Mr. Chairman.

4 JUDGE KELLEY: Any chance we could hear from him
5 next week?

6 MR. PERRY: No, sir, I am afraid not. He is on
7 active duty with the military --

8 JUDGE KELLEY: Oh, oh. Okay.

9 MR. PERRY: -- this week and next.

10 JUDGE KELLEY: He is there now and through next
11 week?

12 MR. PERRY: That is right.

13 JUDGE KELLEY: Okay. Well, I think these con-
14 siderations, just what they are is kind of obvious to every-
15 body and everybody has their own slant on just how they
16 would like to see this unfold, but why don't we go ahead,
17 and why don't we look toward a discussion of this -- did I
18 lose this mike -- on Friday afternoon after we get a better
19 idea of how we are progressing. I think I did lose the mike.

20 MR. MC CLUNG: Mr. Chairman?

21 JUDGE KELLEY: Yes.

22 MR. MC CLUNG: I would just like to make a couple
23 of comments to that if I may right at this time. We have a
24 couple of scheduling problems which I will just bring up
25 for --

1 JUDGE KELLEY: Yeah, go ahead.

2 MR. MC CLUNG: -- everybody's attention. On
3 Saturday my office is being moved, so I would really appreci-
4 ate if there is any dead time, that we not conduct hearings
5 on Saturday if this thing moves. I would try to -- it would
6 really help me out because I have to be there when we are
7 moving my office.

8 And the second scheduling point is both of us
9 have a conflict on Thursday, September the 3rd in the morn-
10 ing. I have a trial in Orange County which shouldn't take
11 more than a couple of hours, and Phyllis has a prior engage-
12 ment at that particular morning time. We would be able to
13 accommodate the afternoon on Thursday, September 3rd.

14 MS. GALLAGHER: It is a speaking engagement for
15 a group of out of town people, professional thing.

16 MR. MC CLUNG: You wouldn't have to do anything

17 JUDGE KELLEY: Well, I'm glad you mentioned it.
18 I would have thought that between the two of you one of you
19 could have been here one way or the other, but I will just
20 take it under advisement at the moment.

21 MS. GALLAGHER: I might mention that I do have
22 in the weeks toward the end of September, the 20th and the
23 or the week of the 21st and the 28th I have two hearings
24 that I have not been able to continue, and they should be
25 brief. They should just take up the morning of Tuesday

1 mornings and perhaps --

2 JUDGE KELLEY: Okay. That is --

3 MS. GALLAGHER: You know, I just want to --

4 JUDGE KELLEY: -- far enough down the road. Why
5 don't we hold that for Friday or a little later. It is the
6 next week or two that I am really most interested in -- this
7 session, this week and next.

8 MR. PIGOTT: Let the Applicants go on the record
9 that these hearings have been set well in advance, and we
10 would oppose any continuance because of conflicting trial
11 schedules or other legal obligations. This has been set
12 well in advance. This is not an inconsequential matter,
13 and we would vociferously oppose any continuance based on
14 such ground.

15 Now we are taking it under advisement now, but
16 I may as well let the parties know what our positin is on
17 those kinds of continuances.

18 JUDGE KELLEY: All right. Okay, well, you see
19 what we are thinking about. Think about what you would like
20 to have, and then we will see what we can do with it toward
21 the end of the week.

22 There was one other matter that we left over
23 to this morning. We had, as you will recall, some discus-
24 sion of employee turnover data, statistics, if you will.
25 And having heard arguments on both sides, I think I will

1 sort of bravely continue the issue in the sense of asking
2 you, Mr. Pigott, to look into what you have got. It seems
3 to us on the one hand that the information being sought is
4 relevant or could be relevant. On the other hand, it could
5 be a pretty heavy burden on you. We don't know how much.
6 So, if you could check with the Applicants' personnel people,
7 and what we are interested in is the turnover statistics
8 with reference to categories of employees that get involved
9 in emergency tasks of one kind or another -- if that is
10 clear enough, specific enough.

11 MR. PIGOTT: We will certainly see what we have,
12 Mr. Chairman.

13 JUDGE KELLEY: Thank you. I believe you had a
14 next witness ready when we --

15 MR. HOEFLING: Mr. Chairman --

16 MR. PIGOTT: I have a next witness. I have one
17 other thing that I would request, and maybe the Staff is
18 going to address it, and that is where we are with respect
19 to various positions on the certification. We are very
20 anxious to move that along.

21 MR. HOEFLING: Mr. Chairman, I would like to
22 speak to two subjects, one of which is the certification.
23 The Staff feels that the certification issue is sufficiently
24 important that it would like to have the benefit of filing
25 a written view on the subject.

1 I have checked with our office, and the filing
2 has been drafted and is presently being reviewed and I would
3 hope that we could get that express mailed out here and have
4 it to the Board and the parties this week, but given the
5 significance of the issue, we would like to have the benefit
6 of filing written views and we are presently inclined to
7 support the Applicants' position.

8 That is where that matter stands at this time.
9 We will check with my office to see what the status of that
10 document is later today.

11 JUDGE KELLEY: Okay. Can you check too about
12 how long it is?

13 MR. HOEFLING: Yes.

14 JUDGE KELLEY: I am wonder -- you know, if it is
15 a few pages, can't somebody phone it out and type it?

16 MR. HOEFLING: Well, let me check into it.

17 JUDGE KELLEY: Okay, see what you can do.

18 MR. PIGOTT: We will -- if it facilitates, we
19 will have our -- be willing to take it in on a facsimile.
20 We are within about 30, 40 minutes from here, so, once it
21 is ready, it could be telecopied out.

22 MR. HOEFLING: Another subject, we spoke yester-
23 day about certain documents, correspondence between FEMA --

24 JUDGE KELLEY: Yeah.

25 MR. HOEFLING: -- and the Nuclear Regulatory

1 Commission Staff and I have looked into that matter. I have
2 spoken with Staff and I have also spoken with Mr. Perry.
3 We have no problems making available the correspondence
4 between FEMA and the Staff that deal with this subject.

5 As I indicated yesterday, I believe all the cor-
6 respondence has been made available with the exception of
7 one document which I am going to distribute now. There may
8 be other correspondence and we are looking for it, but coun-
9 sel is not aware of its existence. What I will do now is
10 distribute a July 17, 1981 memorandum for Brian Grimes from
11 Robert T. Jasky. The subject is the emergency planning
12 status with respect to low power operation at San Onofre.
13 And I have not served this document. I was under the belief
14 that that issue was in the background and I represented at
15 the pre-hearing conference --

16 JUDGE KELLEY: Yeah, I think it is.

17 MR. HOEFLING: -- that the emergency planning
18 was acceptable --

19 JUDGE KELLEY: He --

20 MR. HOEFLING: -- and this doesn't add very much
21 to that point.

22 JUDGE KELLEY: Okay.

23 MR. HOEFLING: So I will distribute this now.

24 JUDGE KELLEY: Thank you.

25 MR. HOEFLING: That is all, Mr. Chairman.

1 JUDGE KELLEY: And that, if I may just be clear
2 in my own mind, that is written -- correspondence or memos
3 between the NRC Staff and FEMA on the subject of San Onofre
4 in what, both directions, whether it is from FEMA to NRC
5 Staff --

6 MR. HOEFLING: That is correct.

7 JUDGE KELLEY: Or vice versa?

8 MR. HOEFLING: That is correct.

9 JUDGE KELLEY: Okay. Does it -- do you have in
10 your files also correspondence, let's say, between -- FEMA
11 writes to Southern California Edison cc the NRC? I mean, do
12 you get that kind of material?

13 MR. HOEFLING: I am aware of one such document
14 we received which, I believe, was attached to a pleading
15 that the Applicants filed, their low power licensing plead-
16 ing. It was a document, I believe, from Southern California
17 Edison to FEMA, indicating the deficiencies that were identi-
18 fied at a meeting between those parties and what the fixes
19 would be. I am aware of that letter, and that letter being
20 attached to a pleading, obviously has been provided to the
21 parties. I am not aware of any other cc's, but if we have
22 such correspondence in our files, I would consider that --

23 JUDGE KELLEY: Could you --

24 MR. HOEFLING: -- being a class of documents --

25 JUDGE KELLEY: -- include that in your look --

1 or I assume that you would?

2 MR. HOEFLING: Yes. That was the intent.

3 JUDGE KELLEY: Okay, and let us know what that
4 produces, if anything. Thank you.

5 Anything else before we resume with the Appli-
6 cants' case?

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

tp# 3-1

1 MR. MC CLUNG: Yes, I have a couple preliminary
2 matters I'd like to take care of here. One we address. I
3 briefly yesterday was the updating of the interrogatories,
4 our interrogatories to the NRC Staff, our last set dealing
5 with the off-site emergency preparedness. They were referred
6 to FEMA, as was represented yesterday, to answer and were
7 sent to us on June 12, 1981, by Mr. Hoefling. And in the
8 letter of transmittal, he represented that the interrogatories
9 dealing with the off-site preparedness had been referred to
10 FEMA for answering and in fact attached the answers prepared
11 by FEMA, along with a statement and transmittal letter from
12 Mr. Cosgrove, counsel for FEMA, to the effect that they did
13 not have time to do complete responses to the interrogatories
14 at that time due to the pressing schedule of everything that
15 the FEMA guys are having to do these days, which I can truly
16 understand.

17 And he represented in that letter that after the
18 June 16 informal discovery session and thereafter that they
19 would review and update and supplement those answers. I'm
20 a little bit confused because yesterday Mr. Hoefling said
21 that FEMA is not an agent anymore, so perhaps the NRC is
22 going to undertake to supplement those responses. I'm aware
23 that -- well, I'd like to make a motion right now to have
24 those interrogatories supplemented. That's my first motion.

25 Do you want me to take these -- maybe we should

2
1 talk about that first.

2 JUDGE KELLEY: Yes. Why don't we get a response
3 on it at this point before we go on to another topic.
4 Mr. Hoefling?

5 MR. HOEFLING: Yes, Mr. Chairman. The situation
6 as I understood it was that those interrogatories were pro-
7 vided by FEMA with the understanding that FEMA would examine
8 those interrogatories to see whether they felt they would
9 supplement the responses. I've spoken with Mr. Cosgrove on
10 this subject and that agency has made a determination that
11 they would not undertake to supplement the responses that
12 they provided. I don't believe any commitment was made at
13 that pre-hearing conference that FEMA would supplement those
14 interrogatories. In fact, I think it was clear that FEMA
15 would examine them and would make a judgment as to whether
16 it felt it was necessary to supplement them. I believe at
17 that pre-hearing conference the Staff took the position that
18 in its view FEMA was not a party in that discovery by way
19 of interrogatory, was not appropriate to that agency, but
20 that discovery should be had by subpoena.

21 And I believe that the way discovery was left
22 at that pre-hearing conference was that the burden was on
23 intervenors to examine those interrogatory responses, to see
24 whether they were satisfied with them, and to contact either
25 the Staff or FEMA in timely fashion to see whether further

3
1 discovery could be arranged. I have had no such contact and
2 I don't believe FEMA has had any such contact either. Our
3 position on the motion would be that the motion should be
4 denied and that discovery has been closed and that Inter-
5 venors have had the opportunity to pursue this since June.
6 They have not. In any event, given FEMA's status in this
7 proceeding, the Staff's view that it is not a party to dis-
8 covery by interrogatory is not proper in any event.

9 Mr. Chairman, could I have one moment to confer
10 with Mr. Perry?

11 JUDGE KELLEY: Yes.

12 (Pause)

13 MR. HOEFLING: That completes the Staff's
14 reponse.

15 JUDGE KELLEY: Just a couple questions. This
16 goes I guess to other counsel, just a point of information.
17 I don't remember whether or when we established a date by
18 which the parties had to say who their witnesses were, the
19 so-called witness list. I've got your letter with a list of
20 sequence, but I don't even recall seeing witness lists from
21 other parties. Is this something we forgot to establish or
22 what?

23 MR. HOEFLING: Mr. Chairman, witness lists, to
24 my understanding, were distributed I believe February 20,
25 1981, by the Staff.

4

1 MR. PIGOTT: No. I think the final witness de-
2 signation was with the testimony, was to be with the filing
3 dates. For instance, we were to file a direct testimony and
4 designate subpoenaed or local persons, but we didn't go
5 through the pre-filing designation that we did at the earlier
6 stage.

7 JUDGE KELLEY: That's right. Now I remember.
8 And I think we said that back in San Diego. So in your --
9 does your letter stating that listing include all your sub-
10 penaed witnesses?

11 MR. PIGOTT: No, it does not. There is another
12 document filed --

13 JUDGE KELLEY: There's another piece of paper in
14 there with subpoenaed witnesses?

15 MR. PIGOTT: It was a separate pleading.

16 JUDGE KELLEY: Okay. And do we have your witness
17 list?

18 MS. GALLAGHER: We have only one expert witness,
19 but we have subpoenaed -- we are going to seek subpoenas
20 shortly for our other subpoenaed witnesses.

21 MR. MC CLUNG: I will be giving that to everyone
22 at the break.

23 JUDGE KELLEY: The list of people?

24 MR. MC CLUNG: The list of people, yes.

25 JUDGE KELLEY: I raised the question simply

5
1 because is it possible at this point under our ground rules,
2 do you have some FEMA people you are going to subpoena?

3 MR. MC CLUNG: Well, we were only going to sub-
4 pena Mr. Nauman, but --

5 JUDGE KELLEY: He's coming anyway.

6 MR. MC CLUNG: So that's all right.

7 JUDGE KELLEY: I'm just coming to whether what-
8 ever the merits may be of the supplementation point, if you
9 can ask the same questions to a live witness would that take
10 care of the problem from your standpoint?

11 MR. MC CLUNG: It may well. It may well. If he
12 can answer it. He's pretty knowledgeable on this stuff.
13 That might take care of it. I'll get to why I'm raising this
14 now.

15 JUDGE KELLEY: Okay.

16 MR. MC CLUNG: Or should we let the Applicant
17 say --

18 JUDGE KELLEY: Let me see. Do you want to get
19 in to this one?

20 MR. PIGOTT: Very briefly. Except we oppose the
21 motion. It is extremely ill-timed to be bringing up further
22 discovery motions after you've actually commenced your hearing.
23 Secondly, my understanding was that discovery not only
24 closed some period of time ago, but we had a special session
25 on either the 15th-16th of July where all parties gathered

1 with an attempt to bypass any formality, get all the informa-
2 tion necessary to the Intervenors. The Chairman was present
3 to make sure that any disputes were resolved immediately and
4 on the spot. And the final words of that conference, as I
5 recall them, was we have no more questions of anybody.

6 I think it is really just completely ill-timed
7 and out of order to be now seeking further answers to
8 interrogatories. I'm sorry. It was June, I guess, June of
9 this year.

10 JUDGE KELLEY: Well, I think I'd like to have a
11 better feel than I do. I recall these documents and I recall
12 the FEMA response saying here's the best we can do right now.
13 But it's not very fresh in my mind.

14 Could you provide the Board with a copy of the
15 interrogatories and the FEMA response and whatever else bears
16 on this and we will give you a decision on the motion pro-
17 bably by the end of the week.

18 MR. MC CLUNG: Okay. Let me with that one move
19 into my next. These are all fairly interrelated points and
20 I hopefully won't take too long with them.

21 The second thing I'd like to do is make a motion
22 for clarification before this Board for the status of the
23 Federal Emergency Management Agency in this proceeding. I'd
24 like to get a clarification. I know that you can be an agent
25 for some purposes and not for other purposes and you may not

7

1 be an agent at all. But I think we've got to get a clarification
2 tion on this. Specifically, I'll tie it down to a specific
3 purpose for right now and I'll probably be making other
4 motions for clarification at other times in this proceeding.

5 But right now I'd like to have a specific clarification
6 igation on whether or not they should be considered an agent
7 of the NRC and of this Board and of the Commission for pur-
8 poses of making a finding or a conclusion on the off-site
9 emergency preparedness. It is my position that if they are
10 such an agent that communications to and from them by the
11 Applicant should be considered ex parte communications under
12 the applicable NRC regulations and that we should be privy
13 to that correspondence.

14 And I would like a clarification to the FEMA
15 status. I've had consultations with the NRC Staff Counsel,
16 Mr. Hoefling, on this and he doesn't agree with me that FEMA
17 should be considered an adjudicatory body, so to speak, of the
18 NRC for purposes of the -- they are not referred to directly,
19 obviously, in the NRC regulations. But the problem that we
20 have here is FEMA was not a litigious body, so to speak,
21 until quite fairly recently. They've been thrust into this
22 thing. Their rules and procedures do not -- they are much
23 less detailed than the NRC's and they don't provide proced-
24 ural safeguards for decision-making type things.

25 And I think if their findings and conclusions

8

1 are going to become either testimony or conclusions which
2 may or may not be adopted by this Board that they have to
3 be considered co-equal with a licensing board type function
4 and that communications to and from them should be no
5 different -- dealing with substantive areas, that is --
6 should be no different than communications to a licensing
7 board or a licensing appeals board.

8 That's a little jumbled, but that's --

9 ///

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 JUDGE KELLEY: Let me ask you a couple of questions.
2 We did talk about this briefly yesterday. Now is the thrust of
3 your request copies of correspondence and papers between the
4 NRC Staff and FEMA? Is that part of it?

5 MR. MC CLUNG: I am more worried about correspondence
6 and meetings between the Applicant and FEMA that I haven't
7 thought as much about the NRC Staff's meetings. Many of the
8 meetings that I know have taken place the NPC has not even par-
9 ticipated in. It has just been between the Applicant, various
10 local jurisdictions and FEMA.

11 JUDGE KELLEY: I am just taking it one step at a
12 time. Taking care of the first problems, Mr. Hoefling is doing
13 it and you have gotten the correspondence between the two agen-
14 cies or you are getting it.

15 Are you arguing that meetings -- communications --
16 between FEMA and the licensee can only be upon notice to --
17 let's say in the context of a contested case -- can only be upon
18 notice to Intervenor groups?

19 MR. MC CLUNG: Yes, Your Honor.

20 JUDGE KELLEY: So if the utility is making some
21 change in some aspect of its plan, they can't pick up the phone
22 and talk to the guy at FEMA without talking to you too?

23 MR. MC CLUNG: I think it would depend on who they
24 talked to. I am saying that they should be considered -- if
25 they are talking to people who are high up in authority, decision

np 2
1 making bodies that are going to be making decisions, as I said,
2 that are going to be adopted by the NRC or may be, then they
3 should be treated like decision-making personnel in the NRC.

4 I know there are provisions whereby the Applicant
5 or licensee can talk to lower-level NRC Staff and not be in
6 violation with the ex parte communication provisions, but I am
7 saying that they should be treated -- the various personnel
8 within FEMA -- should be treated in a similar way as the various
9 personnel within the NRC.

10 In other words, if they are going to sit down with
11 the decision-making body like Mr. Nauman or the heads of FEMA
12 back in Washington, D.C., they should not be able to do that
13 without giving notice to us, yes.

14 JUDGE KELLEY: I think I understand the abstract
15 legal argument. I am still a little unsure about where it takes
16 us in this case.

17 Let's assume for a moment that you are right and
18 the process by which FEMA decides upon the adequacy of the Ap-
19 plicant's plans and the offsite plans is an adjudicatory process
20 only to be carried on upon notice and so forth to all parties,
21 and here we are now. Where do we go with that?

22 MR. MC CLUNG: I am going to make a motion in a
23 moment, or later on in these proceedings, to exclude most of
24 anything that is done after the interim findings on this basis.
25 If I get a ruling in my favor on this issue -- in other words,

1 the Applicant has had sit-down sessions with decision-making
2 level members of FEMA and they worked out schedules -- action
3 plans -- that are found in the pleadings in this case for the
4 things that they should do, and if they do them, they will then
5 satisfy or take care of all the problems that were raised, or
6 at least many of the problems that were raised, which created
7 the unfavorable FEMA finding originally.

8 What I am saying is, we should have been part of
9 that process and I am going to make a motion to exclude from
10 this adjudication anything that happened after the interim
11 findings based on the ruling that you make on this motion.

12 Now if FEMA comes out with another ruling, another
13 finding, I am going to probably have to make a motion to ex-
14 clude that finding as well.

15 JUDGE KELLEY: One reaction I had to this just this
16 morning was that it doesn't seem to me to be suitable for all
17 treatment here. The FEMA witness isn't due here for some time.
18 He is in the Army now.

19 I realize you are busy, but I think if you want to
20 make this motion, you should do it in writing with some re-
21 ferences to authority and the like to which the other parties
22 can respond.

23 It doesn't have to be too long or too elaborate,
24 but I think if we attempt to deal with this orally here -- did
25 you intend that we just argue it here this morning and decide it?

1 I am not prepared to do that.

2 MR. MC CLUNG: I can understand that. What I am
3 trying to do is, you understand it is obvious we have made a
4 motion for continuous an we are under extreme time constraints.
5 The reason I am doing it in an oral fashion -- I could not
6 agree more with what you just said as far as that this thing
7 should be in writing.

8 I would like to have the motion, though, to be on
9 record as being made and then perhaps we could have a filing
10 on the thing and that would be fine. For my purposes of making
11 a record in this thing --

12 MR. PIGOTT: If I might be heard?

13 JUDGE KELLEY: I am going to give Mr. Pigott a
14 chance here.

15 MR. PIGOTT: The rule on motions, they don't have
16 to be in writing and they can be, obviously, at the Board's
17 discretion, but 2730, part B, requires that with respect to
18 motions, that they shall state with particularity the grounds
19 and the relief sought and shall be accompanied by any other
20 affidavits or other evidence relied upon.

21 I don't think Mr. McClung's motions are reaching
22 any level. As one expected to respond, I have no other reference
23 other than that he thinks that something should have been done
24 in a different way at a previous time, and Applicants are really
25 becoming a little bit impatient at these delaying type motions

1 without any grounds. They should have been taken care of
2 literally months ago in an attempt to slow down these hearings.

3 We would request that any motion that the Inter-
4 venors are going to be filing follow the appropriate form of
5 the rules.

6 JUDGE KELLEY: As I already indicated, we would
7 like to see it in writing and we would need, obviously, a pretty
8 specific description of what you believe was done that infringed
9 your rights, what your legal theory is, and what it is that
10 you want the Board to do about it.

11 There will be responses, presumably, from the other
12 parties and we will give as timely a ruling as we can.

13 Are there other matters before we proceed?

14 MR. MC CLUNG: I hate to keep talking. I don't
15 think I am trying to delay the thing. I am actually trying to
16 expedite it. I am trying to figure out for purposes of, in the
17 future, other hearings too, what the relationship ship of the
18 FEMA thing is to the NRC thing and I think if we file it -- and
19 I will be happy to do it in writing and I will.

20 One final thing here. The problem of the witnesses,
21 the witnesses for the Applicant, either in their written tes-
22 timony or when they come up here supplementing their written
23 testimony on redirect or on cross examination, in several
24 instances -- I haven't had a chance to read the transcript yet
25 but in several instances -- they talk about things that are

6
1 going to be done in the future, things that they are going to
2 be doing, things that they intend to do usually, and it is our
3 policy to do such and such, and I am concerned about this.

4 I would like to make a motion at this time that
5 that type of testimony not be considered evidence in this pro-
6 ceeding because we are basically dealing with a set of plans
7 and discovery, as Mr. Pigott pointed out, has been closed.

8 If these matters don't exist as part of the plan,
9 as part of the future things that are in the plan, or in some-
10 where else, I don't see any way that we have a guarantee that
11 any of that stuff is going to happen.

12 So I would like to make a motion that that should
13 be disregarded as evidence in this proceeding, or in the alter-
14 native, a motion that the Board -- and I would have to do this
15 specifically, I would have to give you the specific line and
16 reference later -- get some Board orders with respect to these
17 specific things, that these will be incorporated into the plan
18 in some definable way so that they will actually have to do
19 these things, if that is going to become part of their case.
20 Sorry, Mr. Pigott.

21 JUDGE KELLEY: I understand what you are saying.
22 Let me turn to Mr. Pigott and Mr. Hoefling and we will see where
23 we go on this.

24 MR. PIGOTT: My first thought is that there is
25 nothing before the Board on which to rule. If he has an

hp 7
1 objection to a particular type of evidence, then it should be
2 raised at the time the evidence is proffered.

3 Again, I go back to the form of the motion. These
4 stream-of-consciousness-type motions are very difficult to deal
5 with and I again must cite the regulations, 2.730, sub-section
6 B, that if we are going to be confronted by motions, let them
7 be in some type of a structured form that we can respond to.

8 The fact that Mr. McClung doesn't like, or has prob-
9 lems with, or however else he phrases it, the manner in which
10 Applicants are putting on their case or the manner in which
11 witnesses are answering questions just doesn't, in my mind,
12 rise to the level of an articulated motion under the regulations
13 and I would say that as presently phrased, I have nothing to
14 respond to.

15 JUDGE KELLEY: Mr. Hoefling?

16 MR. HOEFLING: Yes, Mr. Chairman. I will just
17 comment briefly on the concept of GUARD's motion. I think that
18 in general statements to the effect as to what Applicants are
19 doing and undertaking with respect to implementation of their
20 emergency plans and training and development of procedures, I
21 think testimony of that type presented by qualified experts
22 who can be probed on the detail involved or the detail that
23 underlies the commitment, if you will, has probative value in
24 this proceeding.

25 I think that type of evidence is acceptable and

hp 8
1 useful and can form the basis for findings by the Board under
2 the regulations. I think it is permissible testimony as a
3 general concept.

4 Now I think the question has to be examined in the
5 context of a particular statement or a witness, but as a general
6 proposition, I think it has probative value.

7 JUDGE KELLEY: The Board would just like to make a
8 couple of comments again, if you will, on the concept you are
9 raising. I understand your concept. I suppose if a hypo-
10 theoretical applicant came into the NRC and wanted a license to
11 run a power reactor and said with regard to emergency planning,
12 oh, we will do it someday, don't worry, we shouldn't let them
13 have the license. That is just a hypothetical to illustrate a
14 point.

15 On the other hand, take the other end of the spec-
16 trum, I suppose, where you might argue that you can't issue a
17 license until everything has been done and is in place and is
18 sitting there and accomplished, and that, too, isn't very prac-
19 tical in our view and I think I can say in the NRC's view and
20 the history of licensing in this regard, as I know it.

21 To take an example, again, we heard a witness yes-
22 terday from the Applicants concerning the installation of sirens
23 and they are all in place. As of the time the written testimony
24 was filed I don't think they were, but they are now he told us.

25 I suppose he might have told us that they would have

1 them all in place by the 15th of October and I think the Board
2 would have said, okay. If we didn't have any reason to dis-
3 believe his statement that he was going to do something at a
4 certain point, it might very well be acceptable.

5 It becomes, I think, a matter of degree. After all,
6 what we have to decide on this question is whether there is a
7 reasonable assurance that effective steps can be taken to pro-
8 tect against an emergency and that doesn't preclude, in parti-
9 cular instances, relying on testimony that something will be
10 done.

11 That is a general comment. I think the other com-
12 ment that Mr. Pigott made is well taken, that the way to ap-
13 proach this from your standpoint is to question and object as
14 to particular witnesses when they talk about particular things
15 that they are going to do on this issue and it may be the kind
16 of thing that ought to be nailed down a little tighter than a
17 promise, or perhaps a promise is the best you can do. I wouldn't
18 just that in advance.

19 I don't think we are prepared to make any blanket
20 ruling that commitments about future action are not acceptable.

21 MR. MC CLUNG: Thank you, that concludes my pre-
22 liminary.

23 JUDGE KELLEY: Why don't we have a cup of coffee
24 before we turn to the first witness. Let's take about 10 minutes.

25 (Brief recess.)

5 kl 1 JUDGE KELLEY: Back on the record. Mr. Pigott?

2 MR. PIGOTT: I would call Mr. Eugene N. Cramer
3 to the stand.

4 Whereupon,

5 EUGENE N. CRAMER

6 having been first duly sworn by the Chairman, was called as
7 a witness herein and was examined and testified as follows:

8 DIRECT EXAMINATION

9 BY MR. PIGOTT:

10 Q Would you please state your full name?

11 A Eugene Norman Cramer.

12 Q And your current business address?

13 A 2244 Walnut Grove in Rosemead, California.

14 Q Do you have before you a document entitled
15 Applicants' Direct Testimony of Mr. Eugene N. Cramer?

16 A I do.

17 Q And that is composed of 42 pages of questions
18 and answers. Do you have any corrections that you would like
19 to make to that direct testimony?

20 A I do.

21 Q Would you please give them to us?

22 A All right. On page 10, line 22, there is a word
23 missing, have, after the word to, so that it should read,
24 means to have standardized information such as warning.
25 Insert the word have.

1 Another correction would be on page 25, line 9,
2 which presently reads, master of ceremonies. That should be-
3 come media briefing coordinator.

4 JUDGE KELLEY: I had wondered whether Bert Parks
5 was available.

6 WITNESS CRAMER: And further on down on line 12,
7 chairperson of the PIOs should become PIO chairperson.

8 BY MR. PIGOTT:

9 Q That is on line 12?

10 A Yes, same page. And then on page 26, the same
11 changes are made. Line four on page 26, master of ceremonies
12 becomes media briefing coordinator. And the next line, line
13 5 becomes PIO chairperson.

14 Q Do you have any other corrections to make to the
15 prepared testimony?

16 A No, sir.

17 Q If you were asked those questions today, would
18 your answers be the same?

19 A Yes.

20 Q And do you adopt this document as your prepared
21 testimony in this proceeding?

22 A . Yes.

23 MR. PIGOTT: Mr. Chairman, I would ask that the
24 direct tesimony of Mr. Eugene N. Cramer be accepted as evi-
25 dence in this proceeding.

1 JUDGE KELLEY: So ordered.

2 BY MR. PIGOTT:

3 Q Now, Mr. Cramer --

4 MR. MC CLUNG: Pardon me, Mr. Chairman, I would
5 like to raise an objection at this time that I don't want it
6 to be admitted at this time, but be -- it can be put on the
7 record subject to a motion to strike specific references
8 after we have had a chance to cross examine the Witness.

9 JUDGE KELLEY: So you are reserving -- you want
10 to reserve the right --

11 MR. MC CLUNG: Yes.

12 JUDGE KELLEY: -- to strike a line here, a word
13 there, or whatever. All right. We can admit it on that
14 basis at this point.

15 MR. PIGOTT: Admit it subject to a motion to
16 strike, correct?

17 JUDGE KELLEY: Yes, right.

18 BY MR. PIGOTT:

19 Q Mr. Cramer, I believe there was identified yes-
20 terday ENC -- Exhibits ENC-1 through 16, which are designated
21 as exhibit 66 through 81 inclusive, and additionally exhibits
22 ENC-17 through ENC 24, which are formally identified as
23 exhibits 123 through 130 inclusive. And is it correct that
24 you are sponsoring those exhibits in this proceeding?

25 A Yes, sir.

1 MR. PIGOTT: I would ask that those exhibits be
2 admitted to evidence.

3 MR. MC CLUNG: I would like to reserve the motion
4 to strike those as well.

5 MR. PIGOTT: Well, I think -- if I might --

6 MR. MC CLUNG: Foundation will have to be laid
7 during the cross-examination.

8 MR. PIGOTT: All right. Let me ask a couple of
9 further questions then.

10 BY MR. PIGOTT:

11 Q Mr. Cramer, the identified exhibit 66 through
12 81 and 123 through 130, were those prepared either by you
13 or under your supervision and direction?

14 A Yes, with certain exceptions.

15 Q And what are the exceptions?

16 A One exception is number 67, which is identified
17 as ENC-2, and that is essentially the U.S. Marine Corps
18 emergency instructions. Another exception is identified as
19 number 79, ENC-14, and that is essentially a map of the
20 Southern California Edison service territory, with an indi-
21 cation of the various business offices.

22 Then there are three which are somewhat similar.
23 They are identified as numbers 78, 80 and 81, or ENC-13, 15
24 and 16. And they are essentially information which was
25 generated and used during the May the 13th exercise.

1 Q All right. With the exception then of 67 --
2 well, let me take it the other way.

3 MR. PIGOTT: I would request the admission of
4 Exhibits 66, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77 and 114 --
5 oh, I am sorry -- and 123 through 130 inclusive.

6 MR. MC CLUNG: Same request to let them go in
7 subject to a motion to strike after cross-examination is
8 concluded.

9 JUDGE KELLEY: Mr. Pigott?

10 MR. PIGOTT: I would assume that that means that
11 they are in evidence subject to a motion to strike.

12 MR. MC CLUNG: Exactly.

13 MR. PIGOTT: Which --

14 JUDGE KELLEY: So ordered with that -- they are
15 in evidence subject to a motion to strike.

16 MR. PIGOTT: Which I think is the same for any
17 piece of evidence in any proceeding. I don't know --

18 MR. MC CLUNG: I didn't want it to be miscon-
19 strued by my nodding when he said he is placing them in
20 evidence that I am waiving the right to strike. That is
21 all. There is no --

22 JUDGE KELLEY: No, I think that -- I understand
23 that.

24 ///

25 ///

1 (Whereupon, the documents
2 previously marked for identi-
3 fication as Applicants'
4 Exhibits 66, 68 through 77,
5 114, and 123 through 130
6 were received in evidence.)

7 BY MR. PIGOTT:

8 Q Turning your attention to Exhibit Number ENC-2,
9 emergency response information, United States Marine Corps,
10 Camp Pendleton, would you describe what that Exhibit is?

11 A Yes. Exhibit 2 is entitled From the Commanding
12 General to the Distribution List and the subject is indepen-
13 dent evacuation in the event of an emergency at the San
14 Onofre Nuclear Generating Stations. It is dated the 20th
15 of March, 1981. It is several pages long. It puts forth
16 the instructions to the dependents who are living -- residing
17 on the U.S. Marine Corps Camp Pendleton, and in a sense, it
18 parallels Exhibit 66, which is entitled The Emergency Re-
19 sponse Pamphlet.

20 Now, as I will be making the point later, this
21 is a cooperative program with several jurisdictions and we
22 are trying to present here a complete story.

23 Q Do you know for a fact that this is the official
24 document of the United States Marine Corps in this respect?

25 A Yes. I asked the public information officer

1 there to send this to me, and that is included --

2 MR. PIGOTT: I would ask that with that founda-
3 tion, that Exhibit Number 67 be admitted.

4 MR. MC CLUNG: No objections.

5 JUDGE KELLEY: So ordered.

6 (Whereupon, the document previ-
7 ously marked for identifica-
8 tion as Applicants' Exhibit
9 Number 67 was received in
10 evidence.)

11 BY MR. PIGOTT:

12 Q Turning to Exhibit Number 79, which is ENC-14,
13 map of SCE offices and service territory, would you describe
14 what is contained in that exhibit? That is your ENC-14.

15 A Yes. This is a map of the state of California
16 focusing on the lower southern and eastern half and it shows
17 the service territory of the Southern California Edison
18 Company, certain counties and cities indicated. There are
19 heavy dots and round circles on the map that show the loca-
20 tions of Edison business offices. The purpose is to -- as
21 shown in the testimony, to show the extent to which we com-
22 municate in case of a rumor control situation.

23 Q Is this a map regularly used in the ordinary
24 course of the Edison business?

25 A This and one similar like it are regularly used.

1 MR. PIGOTT: On that basis, with that foundation,
2 I would request that Exhibit Number 79, ENC-14, map of SCE
3 offices and service territory be admitted into evidence.

4 MR. MC CLUNG: Okay.

5 JUDGE KELLEY: So ordered.

6 BY MR. PIGOTT:

7 Q Looking as a group at Exhibit Number 78, 80 and
8 81, which are your ENC-13, 15 and 16, would you state for
9 us what is contained in these exhibits?

10 A Yes, these are a series of communications which
11 passed through the information system which I have described
12 at some depth in the written testimony. The first one es-
13 sentially is material which then became an official press
14 release. The second, Exhibit Number 80 is similar or the
15 same material which was displayed on a TV screen in these
16 same business offices in the map I have previously identified,
17 and would be used in rumor control. And then the third,
18 Number 81, is essentially the same information, or similar
19 information which was processed at our general office and
20 placed on bulletin boards and distributed to all employees,
21 again, as an aid in rumor control.

22 Q And do you know that these exhibits are true and
23 correct?

24 A Yes. I selected them from the officially used
25 ones during the drill.

1 MR. PIGOTT: With that basis, I would request
2 that Exhibit 78, 80 and 81 be admitted into evidence.

3 MR. MC CLUNG: No objection, Your Honor.

4 JUDGE KELLEY: So ordered.

5 (Whereupon, the documents
6 previously marked for identi-
7 fication as Applicants' Exhi-
8 bits 78, 80 and 81 were
9 received in evidence.)

10 BY MR. PIGOTT:

11 Q Let me direct your attention to what has now
12 been circulated, I believe, and identified as your exhibit
13 ENC-4(a) and -- well, first of all, just looking at ENC-4(a),
14 which is Exhibit 89 in evidence, I believe for the clarity
15 of the record that that is an exhibit that has been dis-
16 tributed subsequent to the initial service of the direct
17 testimony and the exhibits. Would you describe for us what
18 is contained in the Exhibit 4(a) and the reason for its
19 revision?

20 A Yes. Exhibit 4(a) is entitled Example of Poster
21 and it shows essentially the information which would be
22 placed in various businesses, parks, recreation facilities,
23 that sort of thing, as an aid to transients and residents
24 containing the proper information if they are away from
25 their homes where they would have most of the pamphlets

1 stored. The reason for the change is in the upper left hand
2 corner we are now placing the district number directly there.
3 The original intent had been to use colors. We felt that
4 the number would be much more appropriate.

5 Q I may have misspoke. That particular exhibit,
6 ENC-4(a), Example of Poster or Placard is Exhibit Number 69.
7 I may have said number 89.

8 A The discussion I have given you is responsive
9 to this -- ENC-4(a), Exhibit Number 69.

10 Q Thank you. Looking at your Exhibit number ENC-
11 6(a), Example of Telephone Directory Insert, and official
12 designation Number 71, would you state for us the reason why
13 this was changed?

14 A Yes, and I think you people who have a copy of
15 this in front of you can tell that it is very difficult to
16 read. It has been passing through about three Xeroxing
17 processes here. The original -- and it has been reduced in
18 size. The original version was approximately the same size,
19 but represented one page in the telephone directory. After
20 further discussions with the telephone company we have
21 reached assurances that we will be given two pages, so this
22 should be seen as a larger illustration. The content is
23 essentially the same.

24 Q Directing your attention now to Exhibits 123
25 through 130, which have also been distributed subsequent to

1 the distribution of your direct testimony and the exhibits
2 which accompany that testimony, could you describe for us
3 what is contained in those exhibits very briefly, and why
4 it is that they are coming in at somewhat later a date?

5 A Yes, the first four exhibits, 123, 4, 5 and 6
6 are essentially reduced sized versions of the posters which
7 would go on these respective state beaches and campgrounds.
8 They are being installed this week. Or rather the bulletin
9 boards to hang these posters are being installed this week,
10 and the posters were finished, printed, last Friday. The
11 final four exhibits in this series, numbers 127, 8, 9 and 30
12 are entitled Fliers for San Onofre Love Beach, et cetera,
13 and they represent the fliers which would be stored at the
14 ranger stations and in case of an emergency, they would be
15 handed out to the people there. In the case of the camp-
16 grounds, they would be handed out as the person enters the
17 campground to camp there overnight.

18 And again, these have just been prepared and
19 will be put in use sometime this week or early next week.

20

21

22

23

24

25

#6-1

1 Q Thank you. Mr. Cramer, have you prepared an
2 overview of the testimony you are giving in this proceeding?

3 A Yes, I have.

4 MR. PIGOTT: Unless there are any questions or
5 preliminary matters, I think --

6 JUDGE KELLEY: Were you going to move the admis-
7 sion of the last set you described?

8 MR. PIGOTT: I believe I already have. I believe
9 they are already in.

10 JUDGE KELLEY: All right.

11 MR. PIGOTT: If they are not, out of an abundance
12 of caution I will move again that they be admitted, 123
13 through 130, inclusive.

14 MR. MC CLUNG: They were in before, subject to a
15 motion to strike.

16 JUDGE KELLEY: Fine.

17 BY MR. PIGOTT:

18 Q Mr. Cramer, would you give us the overview?

19 A Very well. The testimony shows how the principal
20 agencies communicate to the public within the 10 mile
21 emergency planning zone. They make these communications
22 before an incident, and we call that the public education
23 program. They would make the communications during an
24 incident, and we would call that the public information
25 program. It is wise to note that these programs are under-

1 taken by the Applicant and the various response agencies in
2 the jurisdictions. They are cooperative programs.

3 Now the public education program essentially
4 publicizes these plans which were made in advance of need
5 by the various agencies, while the information program would
6 amplify or would explain the decisions made during an incident
7 by the various agencies. Again, it is wise to note that
8 neither the public information or education program originate
9 the instructions nor decide when to take action nor decide
10 which actions to take. It's an amplifying or publicizing
11 facility.

12 The public education program is a repetitive
13 program, in that we are now going through the first stage,
14 in the summer and fall of 1981, and this would be repeated
15 or recycled to a certain degree as the years progress. The
16 intent of the public education program is to place key
17 information in key locations prior to or in advance of need
18 and then bring this to the attention of both residents and
19 transients.

20 Now the needs of the residents and transients are
21 slightly different and we serve them in different fashions.
22 For example, we have a pamphlet which was mailed to all the
23 residents within the 10-mile emergency planning zone back
24 in June. For the transients we depend more upon posters,
25 which are placed in locations where we would expect to see

1 many transients, for example, at gasoline stations, parks,
2 beaches, that sort of thing. Then for the residents, pri-
3 marily, reminders during the year would be things like news-
4 paper ads. And we took out newspaper ads when we sent out
5 the mailers. We would have radio or tv presentations and
6 there would be various mailers, not the full package of
7 information, but something more like a utility bill insert
8 would be mailed out during the year as appropriate.

9 Now the public information program is intended
10 to supplement the instructions which would pass from the
11 various emergency operating facilities or emergency operating
12 centers of the various jurisdictions and agencies. We have
13 an emergency media center which will be placed in operation
14 if needed, would be staffed with representatives of these
15 various response agencies. It is a central point for the
16 media to come, to get informed, to get the information.

17 As an example of the kind of information they
18 would get, initially during a stage of an incident, before
19 there is any response requested, we would explain what is
20 happening in the reactor, answer questions of the media,
21 give them sufficient background so that they could understand
22 it. If an incident progresses to where it looks likely or
23 there may be a response, then we would explain the responses
24 needed, we would refresh people's memory as to the contents
25 of these various emergency pamphlets, emergency posters,

1 explain again to the media and through them to the public
2 what response may be required.

3 If it progresses to the stage where a response
4 is required and is advised by any of the response agencies,
5 then we would repeat and amplify the instructions so that the
6 persons residing in the affected localities would understand
7 that they are to undertake certain actions.

8 The testimony, the exhibits essentially go to
9 providing more detailed explanations of the various programs,
10 the various tools for communications.

11 Q Does that complete your remarks?

12 A Yes.

13 MR. PIGOTT: Again, unless there are questions,
14 the witness is tendered for cross examination.

15 CROSS EXAMINATION

16 BY MR. MC CLUNG:

17 Q Mr. Cramer, with respect to your educational
18 background and training, have you had any educational course
19 work or degrees related to psychology or human factoring?

20 A I have no degrees in psychology or human factors.
21 I've taken several courses over the years in schools in
22 psychology. I do not regard myself as a psychologist, though.

23 Q Could you explain or briefly set forth any
24 educational coursework or otherwise that you have had in
25 psychology? If you deem it to be significant.

1 A I'll outline courses. I don't know whether to
2 deem them significant or not. Let's see. I recall back
3 in the early coursework for a bachelors degree I took at
4 least one and perhaps two courses in elementary psychology.
5 In coursework at Claremont Graduate School within the past
6 six years there were at least two courses in psychology, one
7 relating to what is called the human factors in the work-
8 place, how better to employ people in their work. And I
9 just completed a psychology course which I should remember
10 the exact title, but I don't, and it related, again, to the
11 psychology of people in organizations.

12 Q Do you or in your educational background have
13 you had any coursework or degrees in the field of education?

14 A I'm sorry. Would you repeat the question?

15 Q Yes. Do you or in your educational background
16 have you had any coursework or degrees in the field of educa-
17 tion?

18 A In coursework, no. In practice, training, yes.

19 Q Could you briefly set forth your practice and
20 training which you believe goes to your ability as an educator?

21 A Okay. I believe in my prepared testimony I
22 indicated that I worked at a large laboratory and in the
23 period of about 1960 to 1962 I was charged with the education
24 and training of all of the operators and supervisors of three
25 nuclear reactors to meet what were told to me at the USAEC or

6

1 U.S. Atomic Energy Commission reactor operator and senior
2 reactor operator licensing standards. This program I under-
3 took, I devised coursework, I wrote training material, I
4 consulted with educators to write this training material,
5 I devised the programs by which the actual training was
6 carried out and I devised the certification type programs.

7 In a slightly different sphere, I was an instruc-
8 tor for a full year's time at a postgraduate training school
9 called Oak Ridge School of Reactor Technology. We had some
10 30 students from many different countries, some of whom had
11 a very poor command of English. And I taught a rather basic
12 and elementary course in systems, systems of reactors, systems
13 of reprocessing plant, and other things, using the safety
14 analysis reports of these facilities as descriptive material.
15 I also took these people to various sample facilities and
16 explained the equipment to them.

17 In so doing, again, I consulted with educators
18 whose job it was to educate people as to good or better ways
19 to do this. Perhaps other pertinent experience which bears
20 on this is since leaving the laboratory in 1969 I've made
21 myself available to the corporate communications department
22 of Southern California Edison Company to explain to the news
23 media or to people who want explanations. During this time
24 I've had the benefit of instructions from several professionals
25 in varying degrees of formality, courses in how to explain,

1 how to communicate, how not to use all the terribly heavy
2 words that engineers like to use.

3 I would also indicate another experience I had,
4 which is one of the reasons I asked you to repeat your
5 question. During the Three Mile Island incident of 1969, I
6 essentially lived with our news bureau for about two weeks,
7 calling back east to people to find out what was going on
8 and then in turn explaining to the various news media and
9 interested personnel what was happening back there, to the
10 best of my knowledge.

11 Q Thank you. Could you briefly set forth any
12 coursework or educational degrees that you have received in
13 the field of public relations?

14 A I have no degrees in public relations. To the
15 extent that communications work covers that, I would only
16 add that I took at Claremont College sometime in the last
17 five years a course in business writing, I believe it was
18 called, and that included everything from letters to -- not
19 including legal testimony, of course -- but it essentially
20 was written communications.

21 Q Could you please describe or set forth any educa-
22 tional coursework or degrees which you've had in the field of
23 journalism or media?

24 A Nothing to add to what I've already given you.
25 Oh, if you include experience --

8
1 Q Yes, please.

2 A All right. This may sound rather trivial, but
3 I had a radio program once. I was one of two persons with
4 a Saturday morning fifteen-minute radio program that covered
5 the Boy Scout activities in my hometown for about five years.
6 I participated in a disc jockey contest -- I took second
7 place out of five. I don't think -- well, perhaps to a
8 certain extent participation in intercollegiate debate might
9 also have been a useful thing, although I don't really try
10 to debate the media.

11 Q Mr. Cramer, I'm -- would want to clarify some-
12 thing. I couldn't tell from your prepared testimony, do
13 you have a Ph.D.?

14 A No, I do not. I believe the testimony goes to
15 the point that I've completed the written coursework, but
16 I have not completed the oral examination nor written a
17 thesis. Obviously, doing this in the evening is a rather
18 drawn out process.

19 Q With respect to the flyers mailed out or brochure
20 packet mailed out in phase one of the educational program,
21 has that been mailed to all the people at this time in the
22 ten-mile evacuation zone, EPZ?

23 A To the best of my knowledge, yes.

24 Q But that phase has been completed, then?

25 A Yes.

1 Q In your opinion, will it be necessary to complete
2 all three phases or at least have them all in operation in
3 order for adequate assurance that the public will be
4 educated sufficiently to respond properly in the event of a
5 radiological emergency?

6 A The three phases which you refer to essentially
7 cover a first phase, the ten-mile emergency planning zone,
8 the second covers an extension which essentially is those
9 that might hear the sirens but are not in the emergency
10 planning zone itself, and the third phase is essentially
11 those people within 50 miles who I would not expect would
12 be called upon to take action. On the basis that the first
13 phase covers the people who would be expected to take action,
14 I believe that phase is sufficient.

15 ///

16
17
18
19
20
21
22
23
24
25

hp 1
apr 7

1 Q The educational brochure that is going to be mailed
2 as part of Phase 2, has that been drafted yet?

3 A It is in the process of being drafted.

4 Q Could you explain briefly how that document will
5 differ from the brochure that is mailed out in Phase 1?

6 A If you will allow me to refer to the written testi-
7 mony, I can guide people into the words easier, perhaps.

8 I believe what you are asking about is described
9 on page 14 and 15 and is entitled, Emergency Information Hand-
10 book, referred to as the handbook. In about the middle of
11 page 14 it describes the contents.

12 For this direct comparison that you requested, the
13 information in the pamphlet is summarized on page 10 as public
14 notification of emergency protective actions to take, things
15 for school children, for preparing, obtaining special assistance
16 for the handicapped and that sort of thing and of course it
17 has several large maps that contain very detailed information.

18 The handbook is more responsive to general type of
19 information as opposed to specific instructions on what to do.
20 The listed contents of the handbook are who decides to take
21 action, what are the levels of the various local government
22 agencies, information on radactivity releases, radiation ef-
23 fects, what public protective actions apply, and then more
24 information about the reception and care centers.

25 The intent of the two is, if you need a single

hp 2
1 document to enable you to summarize the instructions that you
2 may be issued, it is the pamphlet or the mailer. If you are
3 curious about the set-up of the system or want to know who is
4 it who is taking these actions -- is it utilities, is it city
5 government, what are the relationships about the general process
6 of handling the emergency -- then that is in the handbook.

7 The handbook, essentially, is supplementary to the
8 pamphlet.

9 Q Will the individuals who are outside the emergency
10 planning zone receive information in pamphlet form? Will there
11 be a different pamphlet from the pamphlet that is received by
12 people within the 10-mile EPZ?

13 A Most likely in phase 2 the same information will be
14 used. It will probably be supplemented by maps or something
15 like that to indicate to the people who are not in the emergency
16 planning zone that they are not in the emergency planning zone.
17 We would essentially make the same information available to
18 them.

19 Q Could you explain briefly what steps you have
20 taken -- or the Applicant has taken -- to ensure that the pub-
21 lic information in the educational part of your testimony
22 reaches special population groups such as people who may be
23 Spanish speaking?

24 A We have mailed all the information to the resident.
25 We will have, in the future, community meetings of small groups --

1 10, 50, 100, whoever show up. At that time we will explain
2 to these people the information if they need special assistance.

3 Q Going a little bit further with my question. Do
4 you intend to do anything -- I notice that all information in
5 the testimony is in English. Are you aware of how many people
6 within the 10-mile EPZ are Spanish speaking?

7 A I do not have those numbers. However, I am aware
8 that very few, if any, of the other instructions in that area
9 are in Spanish.

10 Q What instructions are you referring to?

11 A Things like other telephone directories, signs,
12 things like that.

13 Q Do you plan to, in the future, produce any of these
14 pamphlets or signs in the Spanish language?

15 A That is under active consideration right now.

16 Q Do you plan or is it under consideration whether
17 you might have Spanish speaking people attend public seminars
18 that you discussed regarding the emergency education?

19 A That, too, will be considered. We do have two
20 nuclear engineers amongst the group that we have trained who
21 are familiar with Spanish -- that is, it was their original
22 tongue.

23 Q Could you please state what consultants were con-
24 sulted in the preparation of the public information packet by
25 the Applicant?

4
1 A First I would like to draw a distinction here, if
2 I may. In the opening statement I believe that I pointed out
3 that the public information education program doesn't really
4 initiate the information. It is the response agencies and
5 other exhibits which I believe has been entered earlier which
6 define the reactions and that sort of thing, so the consultants
7 which I may have referred to in the opening testimony are con-
8 sultants who specialize in the packaging of information.

9 In general we have an advertising agency which works
10 with out advertising department called Gray Advertising and I
11 believe there is an exhibit here which actually bears their
12 name, as I recall, if you will allow me to look just a moment.

13 Q Yes.

14 A It is Applicant's Exhibit No. 68, which is identi-
15 fied as ENC-3, a newspaper advertisement, and I think if you
16 will look at the very bottom of it where it indicates the various
17 newspapers it appeared in, there is the title, Gray Advertising,
18 Inc. and an ad number.

19 So Gray Advertising would be one of the consultants.

20 Q Were there any other consultants?

21 A There may have been, but I do not recall any at
22 this time.

23 Q In your consultation with Gray Advertising, did
24 you ask them to prepare a plan and give an opinion of what
25 would be necessary in order to effectively educate the public

hp 5
1 within the 10-mile EPZ?

2 A I am not certain I understand that question.

3 Q What I am trying to get at is the nature of the
4 assignment given to Gray Advertising. In other words, were
5 they asked to come up with a whole plan of public information
6 or was that something that you guys did and they just prepared
7 some of the advertising?

8 A I believe the whole plan issue referred to was
9 actually taken in concert with Gray Advertising and with other
10 response agencies and that there was interaction between these
11 groups.

12 I would hesitate at this time to focus on any one
13 individual or group of individuals and say, this is this person's
14 or this agency's plan.

15 Q Did the Applicant or any contractee of the Appli-
16 cant undertake any study of the area to determine what types of
17 public information programs would be necessary to educate the
18 public to the emergency planning issues?

19 A Could you rephrase that? I am not sure I under-
20 stand it.

21 Q What I want to know is, were there any studies
22 made independent of creation of the plans, by a consulting firm
23 or by your staff as to what would be necessary for a public
24 information program?

25 MR. PIGOTT: By study you mean a discrete piece of

1 work with a report at the end of it?

2 MR. MC CLUNG: Exactly.

3 WITNESS CRAMER: No, I do not believe that such
4 a discrete different study was made.

5 BY MR. MC CLUNG:

6 Q Who in Orange County -- in the government of Orange
7 County that were response organizations participated in the
8 formulation of this particular public information program?

9 A Representatives of the Office of Emergency Pre-
10 paredness which is headed by Mr. Burt Turner (ph.), I believe,
11 participated in this.

12 Q Do you know who particularly participated in this?

13 A No.

14 Q Did you engage in any conversations or consultations
15 with anyone at Orange County with respect to the production of
16 the public information packet?

17 A Are you asking if I personally or the company I
18 represent did?

19 Q You personally.

20 A No.

21 Q Who in the County of San Diego jurisdiction parti-
22 cipated with the Applicant and the other local response organi-
23 zations in the formulation of the public information program?

24 A Again it would be the similar response agency of
the County of San Diego.

1 MR. PIGOTT: Mr. McClung, I don't want to object,
2 but are you asking whether or not representatives of these or-
3 ganizations participated or whether or not he knows the names
4 of the people who participated?

5 MR. MC CLUNG: He has already testified that repre-
6 sentatives of the various organizations participated in the for-
7 mulation of the information packet, so that is fine. What I am
8 trying to get at is if Mr. Cramer actively participated in any
9 of that with any of those people and whether he knows the names
10 of any of those people.

11 MR. PIGOTT: That is fine.

12 BY MR. MC CLUNG:

13 Q Do you know the name of the person in the emergency
14 operations branch of San Diego County who participated in the
15 public information program?

16 A In the writing of the pamphlet?

17 Q Yes.

18 A No, I do not know that person's name.

19 Q Have you had any discussions with anyone in the
20 San Diego County response organization with respect to the pro-
21 duction of the public information packet?

22 A No, I have not.

23 Q Who in the City of San Clemente participated in the
24 formulation of the information packet?

25 A I do not know that person's name.

1 Q Did you, or have you had, any contact with anyone
2 in San Clemente in the emergency response organization in the
3 formulation of the emergency information packet?

4 A By emergency information packet you mean this
5 pamphlet?

6 Q The pamphlet and the respective posters.

7 A I had personal contact in regard to the response
8 cards, the feedback cards, and the disposition of the cards.

9 Q With whom did you have such contact and in what
10 response organization?

11 A In the City of San Clemente's organization, the
12 cards go back to the Fire Department and I have had contact with
13 Jack Stubbs of the Fire Department as to the content of the
14 response cards and what action they are taking to dispose of
15 these contents or to take care of the responses.

16 Q Have you had any contact with anyone in Orange
17 County with respect to response cards?

18 A Yes.

19 Q Could you briefly tell the name of that person?

20 A Yes, the person again in the Office of Emergency
21 Preparedness is a Ms. Carolyn Hopwood, and I have had contact
22 with her as to the number of cards, the kind of information on
23 the cards and the means that Orange County would be taking care
24 of these requests for information.

25 Q Who or what employees of the response organization

1 in the City of San Juan Capistrano participated in the formula-
2 tion of the public information program with the Applicant?

3 A I do not know.

4 Q Have you had any contact with anyone in that
5 response organization with respect to the preparation of the
6 public information packet?

7 A No, I have not personally had contact.

8 Q Did the State of California participate in the
9 assemblage of the public information packet?

10 A I believe they did, but I am not certain.

11 Q Who was in charge at Southern California Edison
12 for the preparation of the packet?

13 A The overall program was in charge of Mr. Fred Massey.
14 I believe the packet itself was in the charge of Mr. Jack Wyatt.

15 Q With respect to the cards that were mailed out
16 regarding special information, could you explain briefly what
17 is going to happen to the cards that are sent back in the City
18 of San Clemente?

19 A Yes. Approximately 600 cards have been received
20 and approximately 35 percent of them ask for no assistance and
21 essentially were returned.

22 All the remainder -- I would characterize them as
23 approximately half -- requested in some way for special trans-
24 portation and perhaps equal thirds indicated some physical
25 disability, hearing or essentially feebleness or something like

1 that and requested special notifications.

2 Now when I asked Mr. Stubbs how those were being
3 handled, he simply said, we are going through them one at a
4 time and communicating directly over the telephone or visiting
5 or see what is required. Each is being treated as a special
6 case.

7 Q I would like you to go through the same series of
8 questions with respect to the cards being returned to Orange
9 County.

10 A They had some 65 cards and I believe some 14 or
11 15 of them asked no additional assistance. The approximate
12 breakdowns were about the same. About half indicated some
13 need for special transportation and perhaps equal numbers indi-
14 cated some physical disability such as hearing, difficulty in
15 seeing.

16 Each, in turn, is going to be treated by trying to
17 locate something to take care of that individual. You must
18 realize that there is a difference between the two. San
19 Clemente is very close in whereas Orange County, the head-
20 quarters, is much further away from the people in Orange County
21 who are not in the City of San Clemente or the City of San Juan
22 Capistrano, so it is a little bit more awkward for them to
23 locate the individuals and supply the exact curative measures,
24 but essentially the same thing would take place. They would
25 try to accomodate that individual's special needs.

#8-1
1 Q Do you have any data or do you know of any data
2 for how many people in the City of San Clemente have special
3 need with a particular physical handicap that they might --
4 either with hearing or feebleness, as you set forth?

5 MR. PIGOTT: I'm going to have to object to the
6 form of the question as being a little overly broad. The
7 definition of "disabled" followed by all the qualifiers I
8 think renders it impossible to answer.

9 JUDGE KELLEY: Do you want to rephrase it?

10 MR. MC CLUNG: That's fine. Sure.

11 BY MR. MC CLUNG:

12 Q Do you have any idea of how many people in the
13 City of San Clemente are either physically handicapped so
14 that they cannot drive or are deaf or hard of hearing? Those
15 two, and you can treat them as separate questions.

16 MR. PIGOTT: Any one or all? Is that the
17 intent? Did he answer as to any one or all of those classif-
18 ications?

19 MR. MC CLUNG: If you don't like the compound
20 nature of the question just refer to the physically handi-
21 capped people that are unable to drive.

22 WITNESS CRAMER: I lost the sense of the question
23 now.

24 BY MR. MC CLUNG:

25 Q Let me take over. Do you have any data or do

2
1 you know how many people in the City of San Clemente are
2 unable to drive because of physical handicap?

3 A I do not know that.

4 Q Was any study of that made in order to determine
5 whether or not the response to the card mailing is an ade-
6 quate response?

7 A I do not know if such a study was made.

8 MR. PIGOTT: I don't want to interferewith this
9 line of questions and would suggest, in fact, that you continue
10 them. But I doubt if he is going to know the answers and I
11 would suggest that you may want to save these questions for
12 Mr. Brothers. I'm not completely sure Mr. Brothers has
13 all these answers and that's why I don't object to you
14 asking the questions. You may get some of this information
15 from Mr. Cramer. You may not. But part of it has been
16 covered in Mr. Brothers, who addresses evacuation.

17 BY MR. MC CLUNG:

18 Q Is the answer the same, then, with respect to
19 Orange County? You don't have any idea of how many people
20 are physically handicapped and unable to drive there?

21 A That's correct.

22 Q Let's go back to San Clemente. Do you have any
23 idea how many people are hard of hearing or have hearing
24 impairment in San Clemente?

25 A I do not.

1 Q And the same problem in Orange County? I mean,
2 the same answer to Orange County. You do not know there,
3 either?

4 A That's correct. If you'll allow me to interject,
5 I think you will recognize that there are large parts of
6 Orange County which are not within --

7 Q Thank you. You know, I'm just referring to that
8 portion of Orange County that's within the emergency planning
9 zone, which is what we are dealing with. Thank you very much
10 for clarification. I appreciate it.

11 JUDGE KELLEY: Excuse me, Mr. McClung. From time
12 to time your voice travels very low. Are you always picking
13 this up, Reporter?

14 REPORTER: Yes, but if he would speak a little
15 louder it would be appreciated.

16 JUDGE KELLEY: A little louder would be helpful.
17 Thank you.

18 BY MR. MC CLUNG:

19 Q What, if anything, will be done to check up, to
20 see whether or not the response that different agencies have
21 received with the cards is adequate to the actual need in
22 the community?

23 A Well, to a certain extent there are two checks.
24 One is the check which I performed personally, calling these
25 various individuals, making sure that they were receiving the

1 cards and were taking action. And to a certain extent the
2 newspaper ads, the community meetings serve as a check also
3 because when you advertise in a newspaper that here was a
4 mailing of a pamphlet, did you get it, and we have done that
5 twice -- and we are in the process now of mailing out another
6 mailing which asks the same question "Did you receive this
7 information?" And then the community meetings are an oppor-
8 tunity for the individuals, again later on this year, to
9 come, to state their special requirements or to send a
10 representative and state their special requirements if they
11 feel they have not received the treatment needed.

12 Q What I'm trying to ask, and let me ask another
13 further question on this, is in addition to the card, which
14 is a voluntary type thing and if they know about it and if
15 they get a card they may or may not send it back in, how
16 are -- is there going to be any independent check besides
17 the voluntary sending in of these cards to see or to know,
18 either by the Applicant or by the applicable response
19 organizations, that the actual handicapped population within
20 those jurisdictions has sent in a card?

21 A Other than the measures outlined, I do not know
22 of any now planned.

23 Q Do you know if -- this may be repetitive, but
24 do you know if the City of San Clemente, for instance, is
25 going to undertake any investigation into the number of

1 handicapped people who cannot drive within the city and make
2 sure that they have a list of those people?

3 A I do not know.

4 Q Is there anything on the planning board or in
5 the planning stages in the information program of Edison
6 to actively search out convalescent hospitals or other types
7 of places where handicapped people may tend to be, to stage
8 public information programs at those particular places?

9 MR. PIGOTT: Are you asking that strictly in the
10 context of special public information seminars or whether
11 we've handled or considered such institutions generally for
12 emergency planning purposes? The question sort of went on
13 and on.

14 MR. MC CLUNG: Yeah, I'm sorry. The question
15 is whether or not they'll have the special seminars at these
16 facilities, and that kind of implies that you have considered
17 the facilities.

18 MR. PIGOTT: Well, if you are going to get into
19 the innuendoes on it, that doesn't necessarily mean that--
20 I don't know what the answer is, frankly, but if the fact
21 there may not be a public information seminar does not mean
22 that they have been ignored or not considered because there
23 are other facets to the emergency planning programs.

24 MR. MC CLUNG: I agree. I'm sorry.

25

1 BY MR. MC CLUNG:

2 Q Let me start from the beginning. Do you know if
3 the City of San Juan Capistrano -- strike that. Do you
4 intend or does the Applicant intend, is it on the drawing
5 board to have any public information programs in special
6 facilities where handicapped people exist?

7 A I believe if you check the mailer you will find
8 that some of these facilities, hospitals and things like
9 that, have been identified. Again, as part of the community
10 meetings, these localities would again be approached, perhaps
11 to install a placard or a poster there, certainly to search
12 out the special needs of the institutions. And by "institu-
13 tions" I mean a rather broad definition to include schools,
14 hospitals, to a certain extent churches, nursing homes,
15 this sort of thing. These I believe were identified quite
16 early on as needing special transportation, special require-
17 ments completely outside of the public information or public
18 education program. Again, other witnesses can give you much
19 more detail there.

20 Q For the purposes of public information program,
21 then, the only way we have of knowing whether or not the
22 people that are physically handicapped and cannot drive have
23 received the information is by the cards.

24 A Other than if they are in an institution that
25 specializes in this or otherwise are in some group,

1 identifiable group, yes.

2 Q Do you know which institutions are planned to
3 have these special placards or information in them?

4 A No, I do not know. Again, they are treated as
5 part of a group. They have been identified as needing
6 special treatment over and above this public education
7 program.

8 MR. PIGOTT: Your question was calling for the
9 names of the institutions, is that correct?

10 MR. MC CLUNG: That's right.

11 MR. PIGOTT: Okay.

12 WITNESS CRAMER: I'm sorry. Am I supposed to
13 give --

14 BY MR. MC CLUNG:

15 Q No, that's fine. You're all right. Turning for
16 a second to newspaper ads, how many days do you run those
17 ads?

18 A If you will turn to Exhibit 68, which is identi-
19 fied as ENC-3, it has a picture of the ad. That information
20 is below it and, specifically, it was run in the San
21 Clemente Sun Post on June 10, CoastLine Dispatch the 11th,
22 San Juan Capistrano South Coast News June 11, Capistrano
23 Valley News June the 10th. Now I might point out that in
24 addition to the ad itself there were news releases, stories
25 were run and at various times there have been follow-up

1 stories, for which I must thank the news media, that they
2 have put in a news story about the availability of the
3 information. In addition to this, there was a second ad
4 campaign that was August 5th and 6th. We ran a similar
5 ad.

6 Q Why were these various ads run for such a short
7 period of time?

8 MR. PIGOTT: Well, I'm going to object to the
9 characterization of "such a short period of time" and ask
10 that he rephrase the question.

11 BY MR. MC CLUNG:

12 Q How was the length of time for the running of
13 the ads determined?

14 A It was determined by our consultants, the Grey
15 Advertising Agency. I might point out that we're talking
16 in terms of a program here, we're not talking in terms of
17 something which might be characterized as a three-day sale
18 that occurs only on a short time period. This is a repetitive
19 sort of thing, we have a broad series of informational
20 devices. So one attempts to plan a program rather than to
21 plan a very short campaign.

22 Q With that in mind, in your opinion as a quasi-
23 expert in the public information, wouldn't it be a better
24 program if the ads ran for a week rather than one day?

25 A It's possible that that might be better.

1 Q What information was provided to you by Grey
2 Advertising or do you have as to the number of people in a
3 given circulation of a given newspaper who will actually see
4 an ad when it is done once?

5 A I'm sorry. I don't have that information.

6 Q Did Grey Advertising indicate to you that they
7 thought that running an ad one day in a local newspaper was
8 sufficient to -- and valid for spreading that particular
9 piece of information?

10 A Are you again asking me personally or to the
11 company?

12 Q I'm asking if Grey Advertising made that kind of
13 a recommendation to the company as a whole, not to you
14 personally.

15 A I do not know that.

16 Q Do you know if they recommended any other type
17 of action to be taken with respect to putting these ads in
18 newspapers? In other words, did they recommend putting it
19 in for a longer period of time than one day?

20 A I do not know that.

21 Q Do you know what the circulation in the emergency
22 planning zone or San Clemente is of the Orange County
23 Register?

24 A No, I do not know that.

25 Q Do you know why these ads weren't placed in the

1 Orange County Register?

2 A The consultants advised us that we would get our
3 best coverage by this particular set of papers.

4 Q So are you saying that Grey Advertising recom-
5 mended that you advertise for one day in these various local
6 newspapers?

7 MR. PIGOTT: I'm going to object to the character-
8 ization of "one day". I think the witness has stated repeti-
9 tively that this is an on-going program, that it may have
10 appeared at one day at one time is I think the correct
11 characterization of the witness' testimony.

12 JUDGE KELLEY: The one-day run of this ad was back
13 in June, right?

14 MR. PIGOTT: Well, it's occurred at least twice.
15 It's been run in June and I think the witness just said that
16 the program was re-run in August and then stated later that
17 it's an on-going program. I'm just objecting to the charact-
18 erization that it is a one-shot ad that we leave.

19 JUDGE KELLEY: Sustained.

20 MR. MC CLUNG: That's fair.

21 BY MR. MC CLUNG:

22 Q What I'm getting at, though, is in terms of the
23 program of what the actual coverage is of an ad. In other
24 words, if you run it one day each month rather than running
25 it a week every three months, I'm trying to ask whether or

1 not you've got any kind of advice from Grey Advertising with
2 respect to that.

3 A I'm sure we must have gotten advice like that.

4 Q But you are not aware of that?

5 A That's correct.

6 Q In your opinion, would it be more effective to
7 run an ad for a one-week period in a newspaper or -- strike
8 the "or" -- one-week period in a newspaper every three
9 months or run it one day in that particular newspaper once
10 every month or two?

11 A I'm sorry. I'm having difficulty. Is it a
12 choice between one day in a three month period or two days
13 a month apart in a three month period?

14 Q One week in a three month period, one week solid,
15 seven days, in a three month period, as opposed to one day
16 each month for that three month period, so it would be seven
17 days versus three days.

18 JUDGE KELLEY: Seven consecutive --

19 BY MR. MC CLUNG:

20 Q Seven consecutive days.

21 JUDGE KELLEY: Days or issues?

22 MR. MC CLUNG: That's true.

23 JUDGE KELLEY: Is the San Juan Capistrano Dispatch,
24 or whatever it is, a daily?

25 MR. MC CLUNG: Some of them aren't dailies.

1 BY MR. MC CLUNG:

2 Q Do you know which ones of those papers are daily
3 and which are weekly, if any of them?

4 MR. PIGOTT: Are you referring to the papers
5 which are found on pages 11 and 12 of Mr. Cramer's direct
6 testimony? I'd like some reference for this particular
7 line of questioning.

8 MR. MC CLUNG: Thank you very much. This is my
9 mistake. I'm getting very ambiguous.

10 BY MR. MC CLUNG:

11 Q Referring to page 11 of your testimony, are any
12 of those newspapers daily newspapers?

13 A I believe the San Clemente Sun Post is a daily.
14 I'm not sure about the others.

15 ///

16

17

18

19

20

21

22

23

24

25

1 Q Now, I will return to my question I had before.
2 What would be more effective, in your opinion, a one --
3 seven day consecutive period ad in the Sun Post, or a one
4 day ad once a month for three months?

5 A I find it rather difficult to answer the question,
6 because on the one hand I have seven days of coverage, and
7 on the other hand I have only three days of coverage. I
8 would tend to say a seven day coverage would probably reach
9 more people, except you have an in-migration and an out-
10 migration of people, and so obviously you have no chance of
11 reaching the people who have come in after the ad is run
12 for seven consecutive days.

13 And I think it was with considerations like that
14 that this is an ongoing campaign that we focused on the
15 idea of coming up with repeatings and repeatings rather than
16 what I would characterize as a saturation campaign once a
17 year, and then ignoring the people who come in afterwards.

18 JUDGE KELLEY: Excuse me just a minute,
19 Mr. McClung. As just a matter of public information of the
20 group, it is about twenty of twelve. We noticed that the
21 restaurant here in the hotel plugs up right around now and
22 it is hard to get in and out unless you get there a little
23 before noon. Some of you -- many of you may want to go
24 there. So, what we propose to do, is quit in about five
25 minutes, around a quarter of, and take an hour and fifteen

1 minutes and come back at one, so I think that is best, given
2 our logistic problems, and I wanted to just break in and give
3 you five minutes' notice and let you know we intend to do
4 that.

5 MR. MC CLUNG: Okay, thank you.

6 JUDGE KELLEY: Go ahead.

7 BY MR. MC CLUNG:

8 Q I don't want to belabor this point, but in your
9 opinion, then, -- let me ask that question again in a more
10 comparative way, because you are a scientist and I am not,
11 and that is why I always make these kinds of mistakes, but
12 let's take our three month sample period and let's say I do
13 it three consecutive days at the beginning of the three-
14 month period, and then I plan at the end of that three-
15 month period to do another three consecutive days, or I plan
16 on doing one one day each month. What would be your opinion
17 as far as what would be a more effective way of getting the
18 point across to the people?

19 MR. PIGOTT: I am going to have to object to the
20 relevancy of the question because the inference of a three-
21 month as being the appropriate period of time, when in fact
22 we are dealing with a program that will probably and hope-
23 fully extend through the life of the plant, and I really
24 question the probative value of limited programs such as are
25 being propounded by counsel.

1 JUDGE KELLEY: Well, we have been grappling with
2 this for a while, but the point, as I understand it, even
3 given the point you are making that it goes on for years and
4 years, are you asking is it better to -- let's take a period
5 of a year, is it better to put an ad in once every two
6 months, or is it better to put in three ads back to back
7 twice in a year, whatever the comparative mathematics is?
8 Is that your point?

9 MR. MC CLUNG: Yeah, I am just trying --

10 JUDGE KELLEY: I think --

11 MR. MC CLUNG: -- to get a scenario which
12 Mr. Cramer can answer. I am just trying to compare those
13 two methods.

14 JUDGE KELLEY: Less frequent but more intensive
15 ads, is that better than -- isn't that your question?

16 MR. MC CLUNG: Yeah, exactly.

17 JUDGE KELLEY: Well, can you respond to that,
18 Mr. Cramer?

19 WITNESS CRAMER: I am not sure I can with hard
20 and fast data, which I believe Mr. McClung wants.

21 BY MR. MC CLUNG:

22 Q What I want is your opinion.

23 A Oh, my opinion?

24 Q Your opinion which of those methods would be a
25 better method.

1 A Essentially the same coverage, but whether it is
2 all at once or spread out -- I would prefer spread out.

3 Q See, it gets too -- if I don't get it semi-
4 specific, then -- what I am trying to get at is one day --
5 it is still going to be spread out under my scenario, because
6 it is a program as everybody says -- it is an ongoing program.
7 But what I am trying to do is get a question before Mr. Cramer
8 about the alternative effectiveness of having three days in
9 a row, every couple, two, three months, as opposed to having
10 it one day. So in both senses it is going to be spread out,
11 because in another three months you can have it for another
12 three days.

13 A There may be --

14 Q I am trying to get at why the distinction was
15 made, why the choice not to have it in the -- in a consecu-
16 tive three day thing. You have already answered it. I have
17 asked and answered those types of questions. But what I
18 want to now know is your opinion whether or not you think it
19 would reach more people -- assuming in both scenarios you
20 have an ongoing program, so it is going to be spread out.
21 I mean, you are not just going to do a one-time shot for the
22 whole year.

23 JUDGE KELLEY: Well, what we seem to be groping
24 toward and what we seem to be not at yet is just a specific
25 hypothetical question that Mr. Pigott thinks is reasonably

1 realistic, that the Witness can have a shot at, and we have
2 talked about the fact we don't have daily papers, and it is
3 a long term program, and we are just not there yet, but
4 with those difficulties in mind, can you pose a specific
5 hypothetical question bearing in mind the kind of considera-
6 tion we have been trying to factor in?

7 BY MR. MC CLUNG: Maybe I will ask a few more
8 questions first and then I will be able to get closer to
9 that.

10 JUDGE KELLEY: Well, it is at the time we were
11 going to quit. I do think this has been belabored, frankly.
12 We all know what we are talking about. You want this Wit-
13 nesses opinion? Can you formulate a question --

14 MR. MC CLUNG: The reason --

15 JUDGE KELLEY: -- that would elicit that? I
16 don't think you need five more questions to get at what you
17 want to get at.

18 MR. MC CLUNG: Well, I believe I did formulate
19 one and Mr. Pigott objected to it after --

20 JUDGE KELLEY: All right. Can you restate the
21 one that you formulated.

22 MR. MC CLUNG: I will try to restate that one.

23 BY MR. MC CLUNG:

24 Q Assuming an applicable three month period in the
25 program, which is an ongoing thing for the life of the plant,

1 which in your opinion would be a more effective way to get
2 the information to the public, a program where -- a newspaper
3 ad in a daily newspaper for three straight days, and we are
4 taking the Sun Post as our example, at the beginning of that
5 three month period, or for a newspaper ad taken out in the
6 Sun Post one day each month?

7 JUDGE KELLEY: Any objection, Mr. Pigott?

8 MR. PIGOTT: None.

9 JUDGE KELLEY: Fine. Go ahead.

10 WITNESS CRAMER: I would prefer the one day
11 every month.

12 BY MR. MC CLUNG:

13 Q Could you explain briefly why you would prefer
14 that?

15 A Yes. Because this is a case where you have
16 people moving in and moving out and so on any particular one
17 three-day period, you may catch people who don't want to
18 read the newspaper at that time. You may also not catch
19 people who are not there yet to read the newspaper. One
20 also has to balance this with the intent of the newspaper ad.
21 The intent the newspaper ad is not to educate the person on
22 the details, but just simply to make them aware of the exis-
23 tence of the information and where to get it. So that this
24 is actually applied in a battery of such information aware-
25 ness devices including television, radio, and special mailers.

7
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

So one has to balance all of these things.

MR. MC CLUNG: Thank you.

JUDGE KELLEY: Why don't we break for lunch at this point and come back at one o'clock? Off the record.

(Whereupon, at 11:45 a.m., the hearing was recessed to reconvene at 1:00 p.m.)

AFTERNOON SESSION

(1:04 p.m.)

1
2
3 JUDGE KELLEY: We are back on the record. It may
4 seem a little stuffy to some of you. Feel free to take off
5 jackets if you wish and we will resume with Mr. McClung's cross
6 examination of Witness Cramer.

7 MR. HOEFLING: Mr. Chairman?

8 JUDGE KELLEY: Yes?

9 MR. HOEFLING: I would like to distribute
10 Mr. Nauman's testimony which I have received over the luncheon
11 break.

12 JUDGE KELLEY: Fine.

13 (Documents are distributed.)

14 MR. MC CLUNG: While we are distributing, I will
15 give a copy of our application for subpoenas at the same time.

16 JUDGE KELLEY: All right.

17 (Documents are distributed.)

18 JUDGE KELLEY: Let me ask you, Mr. McClung. Did you
19 have subpoena forms that you were going to use?

20 MR. MC CLUNG: I was going to use the Applicant's
21 form and fill them out. I will get them to you tomorrow. I
22 didn't have time to get them.

23 JUDGE KELLEY: All right.

24 MR. PIGOTT: This is, then, by way of a designation
25 of whom you wish to direct subpoenas? Then we will be receiving

1 copies of the application for subpoena such that if there is
2 an objection in order there will be time to lodge such an ob-
3 jection?

4 For example, I see some party of witnesses that I
5 would want to see some showing as to whether or not they should
6 be called.

7 Specifically, I am not ready right now to roll over
8 and agree that Mr. Deeds (ph.) should be subpoenaed.

9 JUDGE KELLEY: Mr. McClung, it was your contempla-
10 tion, was it, that you would file this application followed by
11 forms and that the Board would act on the basis of those papers?

12 MR. MC CLUNG: Basically, yes. It was my contem-
13 plation that if the Applicant was to object -- and that is, of
14 course, within their right to object and raise questions -- that
15 they do so on the basis of what I have just given you.

16 All that is going to happen is the name and address.

17 JUDGE KELLEY: I am just looking for a way to sim-
18 plify things a little bit in the sense that, under the rule as
19 I recall it, you go through a rather longer, more complicated
20 procedure in the nature of things that one would be required to
21 do.

22 You come in and ask for a subpoena and you give a
23 general -- not terribly detailed -- reason why you want it and
24 if it appears the proper form, it is issued. It then goes to
25 the witness. The witness goes to his lawyer. They decide

1 whether they will move to quash.

2 Why can't we just shortcut that in the sense of,
3 in the case of Mr. Pigott for example, the Applicants, if you
4 could just look over the list and see which ones you may want
5 to see some showing on, you don't have to do that right now
6 but --

7 MR. PIGOTT: I will do that by tomorrow morning.

8 JUDGE KELLEY: Fine, and Staff, if they have ob-
9 jections or questions about the requests with respect to any
10 of these witnesses, could you look over this list and let us
11 know tomorrow morning which ones you at least have a question
12 about?

13 MR. HOEFLING: Yes.

14 JUDGE KELLEY: Then we can consider Mr. McClung's
15 showing and proceed from there but not go through the full pro-
16 cedure with respect, at least, to those to whom there is no ob-
17 jection.

18 Anything else before Mr. McClung resumes?

19 (No response.)

20 Okay, go ahead.

21 Whereupon,

22 EUGENE N. CRAMER

23 the witness on the stand at the time of the recess, resumed the
24 stand and having been previously duly sworn, was examined and
25 testified further as follows:

1 CROSS EXAMINATION (Resumed)

2 BY MR. MC CLUNG:

3 Q When we left off I was just asking a few questions
4 about newspapers and I want to start up where I left off with
5 newspapers and I mentioned earlier THE REGISTER and you said
6 you didn't -- I won't go into your testimony with respect to
7 THE REGISTER -- but are you aware, or do you have any personal
8 knowledge, of the circulation of the LOS ANGELES TIMES in the
9 emergency planning zone, or in San Clemente, to choose a spe-
10 cific political jurisdiction?

11 A No, I do not.

12 Q Can you explain why, to your knowledge, no ad was
13 placed in THE LOS ANGELES TIMES?

14 A Yes, I believe that answer is fairly simple. We
15 chose the specific papers listed in the testimony because they
16 are local papers and because they are more appropriate to these
17 particular needs.

18 I understand that the relative circulations there
19 are perhaps less so it was a more efficient means to put them
20 into these papers.

21 Q Could you explain just a little bit more why it is
22 more efficient and better -- I am not sure I understand why it
23 is more efficient.

24 A Perhaps this will help a little bit. This is the
25 latest ad, which you can't quite see because of the focus here

1 This is the latest ad we put in August 5th and 6th and it goes
2 to all of those papers. The first one, the SUN-POST is a daily.
3 The others are the weekly papers in that area.

4 If you again allow me to refer to my prepared tes-
5 timony, on pages 11 and 12, you notice that the circulations
6 for the San Clemente SUN-POST is 9,500; for the COASTLINE DIS-
7 PATCH, 13,500; San Juan Capistrano, 8,850; and the Capistrano
8 VALLEY NEWS, 17,425.

9 It is my understanding that those papers with re-
10 petitive ads such as this do, indeed, get a good coverage so it
11 was a decision of our media experts and our media consultants
12 that it would be more efficient to advertising on a continuing
13 basis in these newspapers, rather than try to hit every news-
14 paper in the area once.

15 MR. PIGOTT: I might note that the overhead that
16 Mr. Cramer is currently using, I do not believe is currently an
17 exhibit in this proceeding. I will undertake to provide 8 $\frac{1}{2}$ by 11
18 sized reproductions of that and have it marked next in order
19 if it may be stipulated to come in as an exhibit.

20 (The document referred to was
21 marked for identification as
22 Applicant's Exhibit No. 131.)

23 MR. PIGOTT: If Mr. McClung has any further questions
24 on it, or any objection to it coming in as the next exhibit in
25 order, I would like to hear that, but otherwise, just to keep

1 the record complete, I think that should be in.

2 MR. MC CLUNG: I would like it to be in, no objec-
3 tions at all.

4 JUDGE KELLEY: Fine, it will be considered in.

5 (The document identified as
6 Applicant's Exhibit No. 131 was
7 received into evidence.)

8 BY MR. MC CLUNG:

9 Q In your answer to the last question you mentioned
10 the fact that -- I take it that Southern California Edison was
11 what you meant by our media experts. Could you tell me who
12 those experts are?

13 A I would rather give you an idea of the general type
14 of capabilities rather than just giving you a list of names.
15 For example, we have an advertising department which contains
16 experts who make ads, who define advertising campaigns who,
17 over the years, have participated in many of these things. That
18 has built up their expertise.

19 Reporting to this group is a so-called display de-
20 partment in another location which actually makes some of the
21 tools that are used in advertising. For example, the bulletin
22 boards which are going to be installed later this week or next
23 week on the various state parks and beaches will be produced
24 over there in the display department. They also build displays
25 in addition to bulletin boards.

1 They have 10 or 15 people who nail things together,
2 paint, display, draw, all the professional talents one needs to
3 build a display.

4 We have a news media department staffed by various
5 people, including the gentleman in the back of the room who has
6 been very busy explaining to the media what is going on and he
7 has picked up, over the years of working with nuclear, a very
8 good acquaintance with nuclear.

9 There are other people in the news department, quite
10 a few, for example, who have worked extensively in various
11 media and who have had the specific training in the media which
12 I haven't.

13 It is that kind of a talent or a broad range of
14 talents which allowed me to have some confidence in the fact
15 that we have the expertise in house, expertise which I certainly
16 don't have.

17 Q I appreciate that response. One follow up question
18 on it, though, is, do you have the name of any particular in-
19 dividual at the company who would be one of the people that you
20 relied on in making your statement that the media people at the
21 company chose to do the type of newspapers of the small local
22 variety rather than the large general circulation dailies?

23 A Again I can refer you to the manager of the Depart-
24 ment of Communications, A. James Bull. It is within his family
25 that this --

hp 8 1 Q Could you spell his last name please?

2 A B-u-l-l.

3 Q What is the current plan or program as far as run-
4 ning these informational ads in the newspaper? When will they
5 be run according to the current program? I know this one ad
6 had the June dates and the exhibit that was just put in had
7 some August dates which you have testified to earlier. What is
8 the program on those ads?

9 A In general the program is to connect them with spe-
10 cific things which are happening. For example, sooner or later
11 there will be siren testing. Obviously we will run an ad before
12 that time to acquaint people with the fact that the sirens will
13 be run, etc.

14 I believe an earlier witness indicated that there
15 also would be some kind of a survey of 400 persons or households,
16 so in conjunction with that there would probably be a newspaper
17 ad.

18 We will have another exercise next year, so I be-
19 lieve in conjunction with that we would have a newspaper ad.
20 So rather than just saying routinely every month, or a month in
21 which the first Thursday is an odd number or something like
22 that, we will try to connect it to specific occurrences to get
23 as much for the information as possible and to connect it with
24 things which are real and which are happening and which are
25 therefore newsworthy, because then the news media picks up on

hp 9 1 that and carries it a little bit further.

2 Q Did you consider the use of radio advertisements
3 and television spots as a device like the use of the newspaper
4 ad to alert the people in the emergency zone to the distribution
5 of the other public information?

6 A Yes, we do consider it and did consider it. I am
7 looking now for a statement in the prepared testimony as to our
8 intent to use that. I don't see it off-hand. I believe it is
9 in there.

10 ///

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

711 kl 1 MR. PIGOTT: I would direct the Witness's
2 attention to page 8 at about line 6. It may be what he is
3 looking for.

4 WITNESS CRAMER: Yes, thank you. This occurs
5 in a rather general opening statement where we describe in
6 general terms, and yes, we say that for example on page
7 eight, beginning about line three, public presentations will
8 be made directly to neighborhood groups and organizations
9 and indirectly through cable TV and local radio stations.

10 BY MR. MC CLUNG:

11 Q Did you make any local radio stations or TV
12 spots regarding the distribution of the information in phase
13 one?

14 A We sent news releases in that area. I don't
15 recall at the moment whether we actually paid for air time.

16 Q Do you plan to use either the radio or TV medium
17 in any broader way besides just the alert type of situation
18 to ongoing other informational activities and events regard-
19 ing emergency planning?

20 MR. PIGOTT: What do you mean by alert? That
21 has a couple of meanings in this case.

22 BY MR. MC CLUNG:

23 Q Okay. Get rid of the word alert. How about
24 notify? Notify the people of these ongoing emergency ac-
25 tivities.

1 A I would like to make another careful sort. I
2 think I testified earlier that we have a public education
3 program which occurs before an incident, and we have a public
4 information program which would occur during. I think I
5 have testified that as part of this rather broad and re-
6 petitive public education program, we would use the radio
7 and TV media in relation to other things, and that during an
8 incident we have an emergency media center for the sole pur-
9 pose of bringing the media in to explain to them what is
10 happening. I am not really sure to which of these kinds of
11 activities you are referring to.

12 Q I am sorry. I was unclear about that. I am just
13 referring to the first kind of thing, just the pre-incident
14 type of informational distribution.

15 A Okay, and then I guess the answer I would give
16 you would be pretty much that yes, we do have plans to --
17 during the community awareness phase when we approach neigh-
18 borhood groups and organizations, then to also approach
19 community organizations other than the local neighborhoods
20 and radio and TV would also be approached as part of that,
21 during that phase.

22 Q What is the current status of the implementation
23 of the posters in public places and businesses?

24 A Okay, the current status -- I think I have some
25 exhibits which were just introduced. For example, we

1 introduced Exhibits 123, 4, 5, and 6, which are posters
2 being placed this week or early next week on the four various
3 state beaches. Let me hold one up. You can perhaps see
4 these just a little bit better than in the small reduced
5 size. These are the actual posters themselves. They were
6 just delivered to us Thursday -- or Friday afternoon, and I
7 took this set to the same display department and had them
8 mount them on the board.

9 As you can see, there are four of these. Each
10 looks at a distance somewhat similiar in that they contain
11 a map at the bottom, and instructions at the top, and essen-
12 tially these would be posted on the bulletin board which I
13 referred to earlier as being manufactured in our facilities
14 and installed, and their status is, of course, that they
15 should be installed sometime later this week or early next
16 week.

17 Now, in addition to that, I believe we inserted
18 into the record an updated exhibit, 4 -- ENC-4(a), which is
19 actually Exhibit 69, and this is more like what you would
20 see in real life. It -- the small 8-1/2 by 11 doesn't allow
21 you to see anything particularly well, particularly when it
22 is a Xerox of a Xerox.

23 These posters are in the final stages of design,
24 and we should be going out in the near future to the various
25 businesses and localities where we would ask them to install

k4
1 or mount or display these posters.

2 Q Could you tie that down for me in a little bit
3 more specific terms in the time line when you think that will
4 take place?

5 A I would say within the next month.

6 Q Have you made an analysis of -- at the present
7 time of what businesses and what locations you intend to
8 distribute this?

9 A Yes, an analysis has been made, and I believe
10 some 1,500 businesses or localities have been identified for
11 these posters.

12 Q Was that analysis made by Edison Company?

13 A We participated in it. I am not exactly sure
14 precisely who by name or group made the specific analysis.

15 Q I am not sure I understood your answer to that.
16 You don't know who did the analysis?

17 A That is a fair short characterization.

18 Q Will the locations of the posters on the -- in
19 the displays on the various outdoor areas be monitored at
20 periodic intervals for defacement?

21 A The -- if you are referring to these beach pos-
22 ters -- I think that is probably what you are referring to --
23 most of the others would probably be posted inside of a
24 business. The beach posters are protected in the sense that
25 they go on a bulletin board and there is a cover placed over

1 the bulletin board, a cover covered with glass. Defacement
2 would have to be something like taking paint and painting it
3 over. I think our State Parks people have sufficient pride
4 in their facilities that they would take care of some obvious
5 defacements like that. I believe they will monitor them.

6 They are not in a hidden location. They are
7 chosen to be right out in the open.

8 Q With respect to the location, who chooses the
9 location? Is that you -- you being the Applicant -- or is
10 it the State Parks and Beaches I am referring to?

11 A I understand that later on this -- well, let's
12 see. This is Wednesday. Possibly today or tomorrow these
13 localities will be walked with a crew of Edison people and
14 the State Parks people and jointly they will choose locations.

15 Essentially, for example, they would choose a
16 location -- and you must understand, that these are relative-
17 ly large bulletin boards. This shows you the size of the
18 poster itself, and there is space for several other posters
19 or much smaller posters. These will be used for other pur-
20 poses than simply to display this, purposes at the control
21 of the Beach personnel. And so they will choose the locali-
22 ties and facilities to hang them on or to mount them nearby,
23 which suit their purposes. It is where the people congre-
24 gate, where to provide the sufficient information in the
25 most efficient manner.

k6
1 Some of these bulletin boards mount on the walls
2 of a permanent structure. Some of them are on posts so they
3 can be installed almost anywhere that it is good to install
4 them.

5 Q Have you considered any programs for distributing
6 individual leaflets to transient populations on the beaches?

7 A Yes, as a matter of fact we have. I believe
8 earlier we introduced four exhibits into the testimony,
9 specifically Exhibits 127, 128, 129 and 130, identified as
10 ENC-21, 22, 23 and 24. I will hold up some real copies.
11 These aren't copies. These are the leaflets, and we call
12 them fliers essentially. And I think I indicated that --
13 well, first of all, let me show you what they look like.

14 Again, they pick up the same colors as the
15 poser, and on one side it has instructions, on the other
16 side it has a map. And as before, there are four colors,
17 like so. Now, the State Parks and Beaches personnel will
18 stockpile these leaflets at the different beaches, and in
19 case of need they will hand them out to the people, and the
20 exception to this is at the campgrounds. They will hand
21 them out as the camper goes into camp. The reason being a
22 rather obvious one. If you handed out one of these to each
23 person that goes in each day, you problem would have a litter
24 problem -- that is, not all people would be wanting to carry
25 them around all the time they were on the beach.

1 Q Will there be any leafleting program in the Dana
2 Point Harbor?

3 A I would have to consult on that. Dana Point
4 Harbor -- not that I know of. I believe that these particu-
5 lar fliers are intended for the four state beaches. Dana
6 Point Harbor, I believe, would be taken care of by the plac-
7 ing of posters at localities. Again, you have the problem
8 of attendance, how fast people come in, come out. Whether,
9 for example, you might consider people who -- whatever the
10 technical term is, who harbor or dock a boat there consis-
11 tently as to whether they are a resident or a transient.

12 We would tend, I believe, to request that posters
13 be placed at the localities where you purchase gasoline and
14 groceries, in the various restaurant and other facilities
15 like that where people congregate and can see these easier.

16 Q What provisions are going to be taken to ensure
17 or to identify whether or not the populus is actually un-
18 derstanding these posters and fliers?

19 A Probably the best way of doing that are the
20 community meetings, where we would actually go to the neigh-
21 borhoods, to a neighborhood facility. We would advertise
22 the fact that we are going to have this program, and we
23 would invite people who wish more clarifications, more in-
24 formations, more explanations, to come and to ask questions,
25 and at such meetings like this, we would present the

1 information, explain it, explain what we expect the people
2 to do.

3 I might point out that when I say we, I mean we
4 generically. We the Applicant and the several response
5 agencies. I don't just mean we five people in some depart-
6 ment within the Edison Company. This is a community type
7 operation, and we would do this in conjunction with the
8 responsible government agencies.

9 Q Appendix three of New Reg 0654 provides for
10 surveys to be made to figure out whether or not the public
11 understands what it is supposed to do when it hears the
12 sirens. Do you have any plans for surveying the populus
13 in some way to get an idea whether they do understand these
14 posters and fliers and leaflets?

15 MR. PIGOTT: Could we have a citation to New Reg
16 0654 so we know what you are relying on?

17 MR. MC CLUNG: Okay. I will have to withhold
18 the question and give you a citation after a moment's pause.

19
20
21
22
23
24
25

12-1

1 MR. MC CLUNG: I apologize for the delay and I
2 will at this point just strike the reference to NUREG 0654
3 Appendix E because I can't find it and I don't want to delay
4 the proceeding. But I'll --

5 JUDGE KELLEY: Maybe you can find it at the
6 break.

7 MR. MC CLUNG: Okay. That'd be fine.

8 BY MR. MC CLUNG:

9 Q I'll just ask the question whether or not you
10 plan or the Applicant plans to take any surveys in any way
11 of the populace to determine whether or not the informational
12 material is being understood.

13 A At the moment, I would say that the surveys we
14 take will essentially be the community meetings, which are
15 a combination of survey and instruction. The purpose of the
16 community meeting is to supply the understanding rather
17 than just go out and find out if 10 percent or 15 percent or
18 50 percent think they understand or didn't understand, is
19 give them an actual chance to see whether they understand
20 or don't understand and then have the information explained.

21 MR. PIGOTT: If I might interrupt, the reason I
22 asked for the citation is because NUREG 0654 when it speaks
23 of surveys speaks of it in terms of the annual exercises,
24 I believe -- and I'm looking at page 3-3 near the bottom,
25 if you have the FEMA book there, Mr. McClung. If that's

2

1 the basis of your questioning, this witness is probably not
2 going to be in the position to state what will and what will
3 not occur in required exercises on an annual basis to test
4 the various systems. The bottom of page 3-3 and the top of
5 3-4. That would be more likely someone more closely related
6 to facility operation.

7 JUDGE KELLEY: Will you have such a witness?

8 MR. PIGOTT: Mr. Pilmer, specifically.

9 JUDGE KELLEY: Thank you.

10 MR. MC CLUNG: Thank you, Mr. Pigott.

11 MR. PIGOTT: If you have another survey requirement
12 that you want to test him on, you know, that's fine. But
13 this one I don't think goes quite to what Mr. Cramer is
14 talking about.

15 MR. MC CLUNG: For the time being that will be
16 fine. Thank you.

17 BY MR. MC CLUNG:

18 Q Turning now to the handbook, I understand by your
19 previous testimony that this thing is nearly ready, is that
20 correct?

21 A I believe I testified something to that effect,
22 that it was undergoing active drafting right now.

23 Q Could you tell us when in your best estimate
24 you think that handbook will be completed?

25 A Probably sometime within the next month or two.

3

1 The difficulty I have in giving you the precise date is that
2 we would prefer to avoid a precise and somewhat arbitrary
3 date in order to have these things ready in a uniform fashion
4 for the community instruction program. We would not want to
5 put this out on a certain date just to put it out on a
6 date. We'd like to put it out when it's in the correct
7 shape.

8 Q But approximately in the next couple of months
9 you think that will be done?

10 A I believe that's correct, yes. •

11 Q Now is this handbook being designed by any
12 consultants that are helping out on the design of the hand-
13 book or the substance or the display?

14 A I believe this is being done entirely within the
15 Edison family. We of course, when it comes to an appropriate
16 spot, will probably consult with the other agencies who are
17 involved in this, give them a chance to review it.

18 Q Have you reviewed the most current draft of the
19 handbook material?

20 A I believe the most current draft of the handbook
21 should be on my desk now and I haven't been back to my desk
22 for several days. I'd have to answer that I've reviewed the
23 last, but not the most current draft.

24 Q Will the handbook have any information into it
25 regarding the medical aspects of radiological contamination?

1 A I'm not sure I understand what you mean by
2 "medical aspects".

3 Q A description perhaps of the danger of being
4 exposed to certain types of potential radiation which may
5 be released into the environment if there was a nuclear
6 event at the SONGS.

7 A I believe so. If you notice on page 15, where
8 we describe the subjects treated by the handbook, the third
9 subject is entitled Radioactivity Releases and Radiation
10 Effects. In general terms, radiation effects includes
11 illnesses, diseases, that sort of thing which you might
12 consider medical effects.

13 Q Could you describe briefly the treatment of the
14 health hazards of radioactivity which will be contained at
15 least in the current draft of the handbook?

16 A Well, let me point out that this information is
17 intended for members of the public and that the treatment
18 of radiation injuries I believe is a subject which you will
19 be given forthcoming testimony on. At this particular
20 instance we do not intend to put into the handbook
21 what you might consider any detailed information on the
22 treatment of radiation injuries.

23 Q Could you describe for me what you do intend to
24 put in the handbook?

25 A I would not like to go into much greater depth

1 than is already contained in the testimony. You see, this is
2 in a draft state. We are reviewing and I hope improving
3 each time.

4 Q I understand your problem. Unfortunately, the
5 testimony just has that one line with respect to it. I'm
6 not -- not having the handbook in front of me, we do have a
7 kind of moving target here we're trying to litigate and I
8 would appreciate it if you would --

9 MR. PIGOTT: What precisely is the target? I
10 mean --

11 MR. MC CLUNG: The target is the substance of
12 this handbook, which I think is going to be a very important
13 aspect of the public information program. I am referring to
14 a specific aspect of the handbook and I want to know what
15 the handbook is going to contain on that specific subject
16 because many people are concerned about that.

17 MR. PIGOTT: I guess my question is I don't
18 understand what particular portion of the issue that we are
19 addressing here that would cause this witness to be able to
20 state with particularity what the words are that are going
21 to be in a handbook.

22 MR. MC CLUNG: I'm not asking for the exact
23 words. I'm asking for the substance of the treatment of
24 that particular subject. The testimony gives an outline and
25 I am asking basically what's going to be under that point.

6
1 I think it is a proper question.

2 MR. PIGOTT: To be more precise, I guess the
3 objection -- I've sort of not wanted to object because it's
4 rather informative to find out what's going to be in these
5 things. But I'd ask what is the requirement either in the
6 issue or in the regulations that compells this witness to
7 come forward with some kind of a definitive discussion or
8 show any discussion of particular treatment of radiation
9 effects. I think we've gone beyond the scope of the issue is
10 my basic objection at this point.

11 JUDGE KELLEY: Well, this witness is not being
12 offered on the subject of radiation damage, that's true;
13 on the other hand, as I understand it, you are here to
14 testify on the general program of public information and
15 that's what you are addressing and the handbook that you
16 describe in your testimony at pages 14 and 15 does indicate
17 that this information will be cast in rather general terms,
18 which would, again, is consistent with the idea that you are
19 not getting into the details of what happens in the case of
20 radiation damage. But as I understand your question, Mr.
21 McClung, I think we can all concede that it would be better
22 if we had this handbook sitting here in front of us today.
23 It's not here. It's being written.

24 So we are trying to find out what it will be
25 like before it's written. I think that the question directed

1 that way is proper. So with that reaction, perhaps you
2 could restate your question, Mr. McClung.

3 BY MR. MC CLUNG:

4 Q You've stated in your testimony that there's
5 going to be a portion of the handbook that deals with the
6 effects of radioactivity and I wanted to you briefly summarize
7 from -- to the best of your knowledge -- what will be con-
8 tained in the handbook in that section.

9 A Okay. There will be several different things,
10 all pointed to an understanding of, for example, what the
11 terms millirems, curies, that sort of thing which we use in
12 the nuclear industry, to quantify these things. For example,
13 we would also have some information on how radioactive gases
14 spread in terms of wind speed, direction, that sort of thing,
15 how radioactivity spreads, how fast it spreads, that sort of
16 thing. Then we would have some information enabling an
17 individual to link up a number, say, in terms of millirems
18 with what is normal, what is high, what is low, and then
19 what has medical effects. For example, I suspect we would
20 point out that as we sit here in this room our own bodies
21 are giving us something like 27 millirems per year of radia-
22 tion. We would expect people to understand that.

23 And so when it comes to other sections here,
24 for example, in effective public protective actions, we
25 would expect them to relate the relatively low protective

8

1 action guides with an absence of rather severe effects.
2 Again, we want them under this particular section of radia-
3 activity releases and radiation effects to be able to under-
4 stand better why one protective action called sheltering
5 would be effective.

6 If I wished to go into this in depth I would
7 like to in a community discussion program bring in a radia-
8 tion source, a radiation detector, and something like a
9 2x4 and show, for example, that a simple shielding of a
10 house is quite effective in reducing radiation levels.
11 These are the kinds of things which one tries to condense
12 into a handbook and it is this condensation of a lot of
13 knowledge which is the difficulty.

14 Q Will there be any information regarding potential
15 protective actions such as thyroid blocking?

16 A Probably that will be mentioned. I doubt if
17 we will have medical prescriptions. I think there's other
18 testimony forthcoming in this whole area of thyroid blockage.
19 It's essentially not something -- well, I really would prefer
20 that you ask other witnesses questions in that area.

21 Q I'm not asking -- that's fine. I'm just dealing
22 with the contents of the handbook now and wondering if that
23 kind of thing is in there and you can just tell me it's not
24 in there and then I'll cease.

25 A I doubt if it will be in there.

9
1 MR. PIGOTT: I believe he -- I'm sorry. Did you
2 say that it would be mentioned but would not be extensively
3 discussed? I didn't understand what you said, Mr. Cramer,
4 just to make sure we have it clear.

5 WITNESS CRAMER: I believe I said two things.
6 I said it might be mentioned but would not be extensively
7 treated, and later on I said I doubt if it would be in
8 there. I think they are fairly much the same thing.

9 ///

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 Q You have testified it will be maybe a couple of
2 months before this book is done, and I don't want to pin you
3 to a date, but in a time frame after that, how long will it be
4 before it is sent out after it is completed, approximately?

5 A Unless there is a specific reason to hold it back --
6 for example a set of community meetings -- shortly thereafter,
7 but we want to tie it into the community meetings. I would
8 assume it would be sent out in the next week or so.

9 You know, there is a production problem between the
10 finalization of the text and the choice of the illustrations
11 and things like that. Give or take a week or two of production,
12 I would say it would be within a couple of weeks after the text
13 and illustrations are finalized.

14 Q I think you may have answered this earlier, but it
15 may have been indirect, so I want to ask you one more time.
16 Will the handbook be mailed to people in San Juan Capistrano
17 who are outside the 10-mile radius?

18 A The answer is fairly clear. I am looking for it in
19 the text, but essentially we would mail it to the same group of
20 people -- the same 14,800 or so -- residences who got the
21 pamphlet. We would mail it to that same group of people, the
22 handbook.

23 In addition, it would be available at the several
24 locations where you can get information or write to get infor-
25 mation, and we would have it available in community meetings.

ghp 2

1 The difficulty I have in giving you a precise
2 answer to your question is, of course, the Phase 2 program which
3 goes outside the 10-mile EPZ and that area has yet to be
4 exactly pinpointed.

5 MR. PIGOTT: I believe the reference is page 6 and 7
6 of your testimony.

7 WITNESS CRAMER: Thank you.

8 BY MR. MC CLUNG:

9 Q The question I was trying to ask was with respect
10 to the Phase 2. That is what I am wondering. Is the handbook
11 now envisioned to go to the Phase 2 people? That is what I
12 meant by the other people in San Juan Capistrano outside the
13 10-mile zone. I am talking about the Phase 2.

14 A Yes. Let me define it. It is certainly intended
15 to be mailed to the people who got the pamphlet already and to
16 the extent that we have something like this -- like this meaning
17 this document, Exhibit ENC-1 -- going to these people in the
18 extended area, the handbook also would go.

19 Q So do I understand your testimony that both of
20 those type of documents, they are going to go or they aren't
21 going to go? I can't understand whether they are going or not.

22 A I believe they are going.

23 MR. PIGOTT: If I might interject, I believe we have
24 an area, maybe, of confusion between question and answer, but
25 I believe the situation is that both ENC-1, which is the poster

1 thing to each household, and the handbook go to all residents
2 within the 10-mile EPZ, including all residents within political
3 jurisdictions which fall into the EPZ, so in areas where a
4 jurisdiction is partly in and partly out of the 10-mile radius,
5 everybody within that political jurisdiction gets copies of
6 both of these pamphlets and handbooks.

7 JUDGE KELLEY: There is some confusion, isn't there,
8 when you get into the reference to Phase 2. That covers yet
9 another group of people; right?

10 MR. PIGOTT: That is right.

11 JUDGE KELLEY: Everybody who can hear the siren?

12 MR. PIGOTT: Well, that would include everybody who
13 hears the siren. It would -- perhaps it does go to another
14 phase. Ultimately you have things going out almost to 50 miles.

15 WITNESS CRAMER: If you bring in Phase 3, yes.

16 MR. PIGOTT: Yes, but if you are directing your
17 attention to the handbook, then it goes to the same people that
18 ENC-1 goes to, which are all people within 10 miles and also
19 all people within jurisdictions which are included in the 10
20 miles.

21 JUDGE KELLEY: All right.

22 WITNESS CRAMER: It would help to look at page 6
23 where we define the phases and define the territories. In
24 summarizing what we have said on page 6, we say essentially the
25 10-mile EPZ is Phase 1. They have received this and I think

ghp 4

1 we had testimony earlier yesterday which showed essentially
2 that the boundary of the 10-mile EPZ was right in here, but
3 other areas were included because part of that jurisdiction was
4 in the 10-mile EPZ.

5 The question about the phases of the program, again
6 the second phase is outside the EPZ and therefore outside the
7 region where these things were mailed, but because the sirens
8 may be heard outside the 10-mile EPZ, we would want to let the
9 people in those localities know what is going on.

10 At this state, I doubt that we would mail the whole
11 battery there because then we would have these people looking
12 at the map and saying, why am I getting this if I am not on the
13 map, so I think we would more likely cover that with some an-
14 nouncements and some special maps and that sort of information
15 which is why I am somewhat doubtful that we would go to the
16 extent of providing a handbook if something is mailed to this
17 group.

18 JUDGE KELLEY: I think that clarifies it.

19 MR. MC CLUNG: Yes.

20 JUDGE KELLEY: At least you understand what is
21 being done. You may disagree with what is being done, but at
22 least it is clear as to what is being done.

23 MR. PIGOTT: The obvious exception is that por-
24 tions of Orange County unincorporated lie within 10 miles and
25 not all of Orange County is being served.

ghp 5
1 BY MR. MC CLUNG:

2 Q The testimony that I think confuses me is the
3 references continually to 10 miles, and that always confuses
4 me, but actually you are talking about 10 miles and all the rest
5 of San Juan that exceeds 10 miles when you are talking about
6 the Phase 1, so that means that everybody in San Juan has
7 received the informational packet?

8 A Yes.

9 Q To your knowledge?

10 A To my knowledge they have been sent the packet.

11 Q Now that I understand, let me ask -- you have
12 answered it already I am sure, but I will refer to the map,
13 your exhibit 1 and I don't have my exhibit list in front of
14 me, No. 9.

15 No. 9 contains a portion of Dana Point and a por-
16 tion of Capistrano Beach, it looks like to me. Is that area
17 in Phase 2?

18 A No, that should be in Phase 1.

19 Q So as far as you know the flier should have been
20 mailed to that area?

21 A Yes.

22 Q Do you know what the reason for the break in that
23 line is on No. 9, why does that stop there? I am trying to
24 get a handle on it.

25 MR. PIGOTT: Stop where?

1 MR. MC CLUNG: If you look at the Pacific Coast
2 Highway, the little red arrow there and the line goes up on
3 the top side of subdivision No. 9.

4 BY MR. MC CLUNG:

5 Q What I am asking is why that area is included in
6 the emergency planning zone and, conversely, why does it stop
7 where it stops?

8 MR. PIGOTT: Are you asking him why -- I think you
9 are getting into the area of asking him how the EPZ was derived
10 and I really don't think that is this man's function. There
11 are other witnesses -- Mr. Pilmer, Mr. Murray, Mr. Brothers --
12 all of which will go into how this was arrived at.

13 The fact is, this is it and he is ready to tell you
14 about what the public information program is within the area,
15 not how they got to the area.

16 MR. MC CLUNG: I appreciate that and I think that
17 is a valid point and I will be asking those types of questions
18 to other witnesses. What I am trying to understand, we just
19 got through an explanation which I thought I understood of how
20 the 10-mile zone goes out for public information purposes, and
21 then you go on and you take in a political subdivision, namely
22 San Juan Capistrano, and that is part of Phase 1.

23 BY MR. MC CLUNG:

24 Q This No. 9 that I have been referring to is outside
25 the 10 miles entirely and it is not in a political subdivision

ghp 7
1 and what I am trying to figure out is why is it included and
2 how does it fit within the discussion we are talking about?

3 MR. PIGOTT: First of all, we would have to check
4 the geography and I don't think you are correct in your geo-
5 graphy, Mr. McClung. If we take a look at the map on the board
6 which was part of the testimony of Mr. DuBois, in the far left-
7 hand corner you will see that the 10-mile EPZ runs through the
8 Dana Point Harbor which is a part, I believe, of that same
9 political subdivision.

10 MR. MC CLUNG: I am over at the map which is a blow-
11 up of some exhibit. I am not sure which exhibit. Do we have
12 a number for this, Dave?

13 MR. PIGOTT: That is a blow-up of Mr. DuBois'
14 Exhibit 1 and 2 which would be Applicant's 50-something.

15 MR. MC CLUNG: Mr. Pigott has said that he believes
16 it is a blow-up of one of Mr. DuBois' exhibits. It is
17 Applicant's Exhibits No. 60 and 61. It is No. 61 without the
18 overlays.

19 Now if we look in the lower left-hand corner of the
20 exhibit, Applicant's Exhibit No. 61, we see that the 10-mile
21 line intersects the very beginning or the very southerly-most
22 portion of the Dana Point Harbor.

23 If you will look at Section No. 9 on Mr. Cramer's
24 Exhibit No. ENC-1, it is not included within the 10-mile line.

25 JUDGE KELLEY: Mr. McClung, just the very last part

ghp 8
1 of what you said -- and perhaps I am trying to look at too much
2 at the same time -- when you say it is not included within the
3 10-mile line with reference to this document -- did I under-
4 stand you correctly?

5 MR. MC CLUNG: All I can do is hold my map up against
6 the map that is on the wall which is Applicant's Exhibit No. 61
7 and you will see that the line comes in right at the lower
8 right-hand part of the Dana Point Harbor.

9 JUDGE KELLEY: Does it catch a piece of it?

10 MR. MC CLUNG: It just catches an ever-so-tiny
11 piece of it, but the entire rest of No. 9 is not in the 10-mile
12 zone.

13 JUDGE KELLEY: Okay.

14 MR. MC CLUNG: That is the point I was trying to
15 make and I am trying to figure out why it is there.

16 MR. PIGOTT: That is the whole point. Because a
17 part -- however small or geographically insignificant -- came
18 within that 10-mile arc, the entire political subdivision was
19 included for purposes of emergency planning and it is in, geo-
20 graphically, and therefore it is in as part of the EPZ plan.

21 MR. MC CLUNG: What is the political subdivision?

22 MR. PIGOTT: Dana Point, the unincorporated portion
23 there. Mr. Pilmer will be discussing this in more detail,
24 but that is the reason. You may not like it and you may not
25 agree with it.

1 MR. MC CLUNG: Fine.

2 JUDGE KELLEY: On the contrary, it seems to me that
3 from the standpoint of your prospective, if you looked at this
4 map and you found that they dropped somebody out of the picture,
5 that would be a focus of concern, but if they included somebody
6 who at least, under their theory, didn't even have to be in-
7 cluded in the first place, what is the objection to that?

8 MR. MC CLUNG: I am not really making any objections
9 at all and I don't mean to. I am just trying to understand the
10 motivation behind this and see where -- for instance, the 10-
11 mile EPZ -- Dana Point, as far as I know, is not a political
12 subdivision. It is just an unincorporated area with a name
13 and there are other areas that are intersected by the 10-mile
14 line which are unincorporated areas with a name which aren't
15 taken in with this little sweep and I was just wondering why
16 that particular one was. I know it is beyond the scope of what
17 has gone on.

18 JUDGE KELLEY: As to these other areas that you
19 refer to, it seems to me that that would come out with regard
20 to the EPZ drawing and the map with regard to this witness.

21 MR. PIGOTT: I would point out there are areas --
22 the way California is populated, the unincorporated areas do
23 become, in effect, communities.

24 For instance, you see in Area No. 5 there, Capistrano
25 Beach. That is also an unincorporated area, I believe, of Orange

1 County. Likewise Dana Point is an unincorporated area of Orange
2 County.

3 I sound like I am testifying now, but people ac-
4 tually get so they know they live in Capistrano Beach. That is
5 a place as far as I am concerned. A census person may say, you
6 live in Orange County, but they know where they live.

7 JUDGE KELLEY: I live in Chevy Chase, Maryland.
8 It doesn't exist, according to the map. Let me just interject.
9 You do use the phrase on page 7, political jurisdiction, and
10 that does suggest that it is some kind of formally recognized
11 discrete piece of real estate as opposed to an informal gathering
12 of people, does it not? I mean, it does to me anyway.

13 Are you saying that you don't mean that and that
14 rather you are looking at not only formal political jurisdic-
15 tions but also where clusters of people happen to live?

16 WITNESS CRAMER: I think I am agreeing with you in
17 the context of that last sentence on page 6 and the first
18 sentence on page 7 saying, the EPZ established for the first
19 phase of the program includes areas beyond the 10-mile radius,
20 which is Mr. McClung's area of concern, in order to perform
21 uniform information to all members of that same political
22 jurisdiction, whether they be political formally or informally.

23 MR. MC CLUNG: Thank you. I won't go into that
24 further at this time. I appreciate the clarification.

25 JUDGE KELLEY: Excuse me. While we are on the

1 subject, just to make sure that we understand it, in the sen-
2 tence you just quoted, the EPZ established for the first phase
3 of the program includes areas beyond and so on, are you re-
4 ferring only to the program of public information dissemination?

5 WITNESS CRAMER: Yes, that is what I was referring
6 to.

7 MR. PIGOTT: Other people will address other aspects,
8 for instance the evacuation of the various areas.

9 JUDGE KELLEY: And the EPZ for those other purposes
10 might not be at the same places?

11 MR. PIGOTT: I believe it is for the areas that we
12 are looking at now.

13 JUDGE KELLEY: The rest of San Juan Capistrano,
14 for example?

15 MR. PIGOTT: Yes.

16 JUDGE KELLEY: Okay.

17 WITNESS CRAMER: If you will permit me, that is
18 essentially the whole point here, to maps such as this and to
19 the public education program, is to give them this information.
20 In areas 8 and 9 for example, they are slightly the other side,
21 but they are included for the reasons we have mentioned above.

22 ///

23

24

25

#14

1 BY MR. MC CLUNG:

2 Q Referring now to public meetings and the public
3 education program, do you have any of those on calendar at
4 the present time?

5 A No, we do not have any scheduled.

6 Q Do you know when you might be scheduling some?

7 A Yes. Within the next two months.

8 Q Who will conduct these meetings, as they are
9 currently planned?

10 A I believe I've already testified to the effect
11 that we have sort of a cooperative thing and that the local
12 governments will be involved with the Applicants in these
13 meetings.

14 Q Have you contacted personally any of the local
15 government response organizations as far as setting up some
16 of these meetings?

17 A I have not personally contacted them.

18 Q Is there currently a plan on the drawing board
19 for how the public will be notified of these meetings?

20 A I think they will be notified in the same way
21 that we would notify them of any other meeting, for example,
22 and that would depend to a certain extent on the specific
23 communities. In a heavily populated high density area such
24 as the City of San Clemente we might choose an entirely
25 different approach than in some of the outlying neighborhoods

1 where the population density is much smaller and there are
2 fewer facilities to hold these meetings in. So it will
3 depend to a certain extent upon the neighborhood, the
4 localities available within that general area.

5 Q I understand it will depend. Could you discuss
6 the various means for letting the people know, perhaps in
7 San Clemente?

8 A In San Clemente?

9 Q Are these on the drawing board now or are you
10 just making them up?

11 MR. PIGOTT: I'm going to object to --

12 MR. MC CLUNG: Strike that. I apologize. I
13 don't mean to be argumentative.

14 BY MR. MC CLUNG:

15 Q What I'm trying to get at is does a plan exist
16 for the announcement of a public meeting in San Clemente,
17 for instance, of how it will be announced today?

18 A Well, if you mean by plan do we have a particular
19 area chosen, a particular set of informations, a particular
20 set of letters or newspaper ads or whatever, no, it does not
21 exist to that fine depth. What I'm trying to convey is that
22 we have a rather large area here that has quite different
23 characteristics and that when we isolate a particular neigh-
24 borhood then we will use an appropriate means. For example,
25 one appropriate means might be to post in local grocery store

1 if that happens to be the primary means of communicating
2 to the neighborhood. Another for a highly densely populated
3 area, we simply might have a group of handbills placed in
4 each residence doorway.

5 Q Is there currently an existing curriculum or
6 plan for what will be discussed at these types of meetings?

7 A I believe I've already testified to the effect
8 that this is a kind of an educational session, that we would
9 be using the information such as this which we expect each
10 resident to have. We will be going over this information,
11 explaining, answering questions. We would be attempting to
12 show them the desired actions in each of the several instances.
13 For example, how to get information during the earlier stage
14 of the action. If sheltering is requested we would explain
15 those actions. If evacuation is requested, we would explain
16 those actions. We would do this in concert with representa-
17 tives of the local governments whose responsibility is to
18 advise such actions.

19 Q Will you have public meetings of this sort in
20 the area outside what I will call Phase -- the EPZ as you
21 defined it earlier in your testimony, in other words, in
22 the areas where people are in earshot of the sirens but
23 outside the emergency planning zone?

24 MR. PIGOTT: Oh, I'm going to object. I think
25 the question is now getting extremely vague and certainly

1 beyond the scope and it mischaracterizes the testimony.
2 I believe the witness is testifying that the public informa-
3 tion extends to the areas included on the map and I object
4 to any tying it into people who hear or don't hear sirens.
5 I think we're past the probative value of the examination
6 at that point.

7 JUDGE KELLEY: I thought we had spent some time
8 getting that clear -- maybe we failed -- a little while ago.
9 I thought you went to the ten miles and you kept going in
10 political subdivisions, as you refer to them at the top of
11 page 7. Is that the area?

12 MR. PIGOTT: Yes.

13 JUDGE KELLEY: Okay. And you are changing it
14 to the earshot concept, which is a little bit different.

15 BY MR. MC CLUNG:

16 Q Isn't that Phase Two, the earshot?

17 A To a large extent.

18 Q So there is some public information that goes
19 in the earshot. So my question is simply are there going
20 to be public meetings held in the earshot zone? I mean I
21 don't see why that's beyond -- I don't know what else to
22 call it. But in Phase Two will there be public meetings in
23 that area to acquaint the people with the issues that are
24 raised in the pamphlet and otherwise? I don't understand
25 what Mr. Pigott's objection is.

1 A I'd like to give you a more definitive answer
2 than the one I'm going to give you, but I'd like to also
3 point out that until we know who hears and where they hear
4 outside the zones indicated on the map it's kind of awkward
5 to answer a question like that. It may be most effective
6 if it's a particular community in a very small location to
7 have a community meeting; if so, we would do that. If it
8 appears to be a rather broad area which is very, very
9 scattered, it may be better to simply send letters and
10 specific information.

11 Q So do you or do you know have specific plans as
12 of today to hold public forum type meetings in areas that
13 -- where they can hear the siren after you determine when
14 those things are which are outside the emergency planning
15 zone --

16 MR. PIGOTT: Asked and answered.

17 JUDGE KELLEY: Isn't the answer to that "No"?

18 WITNESS CRAMER: That is correct. We do not.

19 MR. MC CLUNG: Thank you.

20 JUDGE KELLEY: Why don't we take a break. Fifteen
21 minutes.

22 (A brief recess)

23 JUDGE KELLEY: Back on the record.

24 MR. PIGOTT: One preliminary matter, I think,
25 before we go forward. We've had discussion with the

1 Intervenor and have reached I think an understanding or a
2 stipulation with respect to the testimony of Gary Re. Mr.
3 Re is the sponsor of Exhibit 121, GR-1, Final Report Technical
4 Studies Ingestion Pathway Zone, Emergency Response Planning
5 for Southern California Edison Company, February, 1981. The
6 substance of Mr. Re's written testimony is simply to lay the
7 foundation for the fact that he's the author of that document.
8 Mr. Re's offices are in the Washington, D.C. area -- New
9 York. I take it back. In New York.

10 We have reached a stipulation, I believe, where
11 Exhibit 121 may be admitted into evidence. Mr. Pilmer will
12 stand questions concerning its use, but otherwise it is to
13 be admitted into evidence.

14 MR. MC CLUNG: We have stipulated to that. That
15 is fine with us.

16 MR. PIGOTT: I have discussed it -- I shouldn't
17 say I have, but I think we have discussed it with Mr. Hoefling
18 of the Staff; I did not get a chance to reconfirm the stipu-
19 lation. I trust they have no problem with it.

20 MR. HOEFLING: No. No difficulty with that,
21 Mr. Chairman.

22 JUDGE KELLEY: I appreciate your working that
23 out. That seems to be a useful stipulation.

24 MR. PIGOTT: Could I have an order allowing
25 Exhibit 122, GR-1 into evidence?

1 JUDGE KELLEY: So ordered.

2 (The document marked for
3 identification as Applicants'
4 Exhibit No. 121, GR-1, was
5 received in evidence.)

6 MR. PIGOTT: And would voluntarily strike the
7 testimony of Mr. Gary Re previously filed.

8 JUDGE KELLEY: Yes.

9 MR. PIGOTT: Thank you.

10 JUDGE KELLEY: Go ahead.

11 BY MR. MC CLUNG:

12 Q Has a standard operating procedure been developed
13 for notifying the Emergency Broadcasting System?

14 A I believe so. But I also believe that other
15 witnesses are more appropriate testifiers to this effect.

16 Q Okay. On the mailing of the pamphlet to the
17 emergency planning zone, which has already been done in
18 Phase One, what list served as the mailing list for that
19 mailing?

20 A Okay. Rather than state that there is a list
21 let me describe how the households were chosen. San Diego
22 Gas & Electric Company went to their list of meters. In
23 other words, the question is how do we provide electric
24 service to those homes within this area. Computer runs were
25 made to identify the meters within this area on the map that

1 we've previously referred to where there were multiple
2 addresses. For example, a meter exists in a certain spot
3 but the bill is sent to another spot outside the ten-mile
4 zone. Both addresses were sent the material. Now the
5 exception is probably within Camp Pendleton, where they are
6 what we call master metered, they purchase their electricity
7 through Camp Pendleton rather than us. So that part is
8 covered under the Camp Pendleton information which is
9 Exhibit ENC-2, et cetera, et cetera, Exhibit No. 70.

10 So the simple answer to your question is we
11 looked up the meters for all the residents in the area and
12 sent those residents the pamphlet.

13 Q Is there a provision for renters or multiple
14 unit dwelling houses which may not have more than one meter?

15 A Yes, that's correct. They identify -- "they"
16 meaning, again, San Diego Gas & Electric Company -- identified
17 something like 200 of what are called master meters. That
18 is a meter which serves a collection of apartments or homes
19 or whatever. Special arrangements were made to deal with
20 those situations. For example, they would call up and find
21 out who the person in charge or the person who is responsible
22 at that address and then make an arrangement with that person,
23 either by sending them enough pamphlets that they agreed to
24 deliver or by running out and delivering them themselves.
25 So yes, arrangements were made.

1 Q And this was by personnel of the San Diego Gas
2 & Electric Company, is that correct?

3 A That is correct. A point of information, if
4 you'd like. Most, if not all, of the residences in this
5 area are within the San Diego Gas & Electric Company terri-
6 tory, as opposed to the Southern California Edison territory.
7 So obviously we would have to take their records.

8 Q Regarding the entire public information program
9 as a whole, is there any other discussion besides in the
10 tentative handbook where the effects of radioactivity are
11 going to be discussed?

12 MR. PIGOTT: You're talking about published
13 material, is that correct?

14 MR. MC CLUNG: Well, published material and if
15 it's on schedule for a community meeting type of a situation.

16 WITNESS CRAMER: I think it's fair to answer in
17 this fashion. In the press room today and at the media
18 center during the May 13 exercise we also used another
19 booklet whose title, I believe, is "Radiation in Medicine
20 and Industry", which contains the information you asked about.
21 Now at this particular point in time we do not intend to
22 mail that out or hand that out individually en masse, but
23 that is one of the documents we use in briefing the media.

24 BY MR. MC CLUNG:

25 Q Have any of the documents that you are using in

1 the mailing or the flyers been pre-tested on any small
2 sampling of people in order to determine whether they will
3 be effective?

4 MR. PIGOTT: What do you mean by "effective"?

5 MR. MC CLUNG: Understood. Comprehended by the
6 people who would receive them.

7 WITNESS CRAMER: I have to give you one of those
8 left-handed / right-handed answers. In terms of a rather
9 massive survey with large numbers of people, no. In the
10 developmental process, as I have previously indicated with
11 some of the revised exhibits, we have tried them out on
12 small groups of people and improved. I'm specifically
13 referring to the exhibits which were marked ENC-4(a), which
14 is Exhibit 69, and Exhibit ENC-6(a), which is Exhibit 71.

15 ///

16

17

18

19

20

21

22

23

24

25

BY MR. MC CLUNG:

kl

1 Q Your testimony states that additional information
2 will be sent out to -- through inserts in bills, utility
3 bills. Do you have any evidence, or do you know of any
4 evidence which indicates whether or not people pay any at-
5 tention to what is put in with the bills? In other words,
6 do you have any things where you have asked for a return or
7 something in the past?

8 A I don't have that knowledge directly. I am try-
9 ing to think if Edison in the past years has ever sent out
10 anything which you might regard as a questionnaire as a bill
11 insert and I can't recall any.

12 Q Turning now to the public information during an
13 accident phase of your testimony, I would like to ask you a
14 couple of questions about the emergency media center. In
15 the event -- I note that the emergency media center is lo-
16 cated in San Clemente, and in the event of a radiological
17 emergency which would require evacuation, it would probably
18 have to be evacuated too. What -- is there an alternative?
19 What would happen in the event of an evacuation as far as
20 the public information media center?

21 A Well, obviously we would like to believe that the
22 media would be gracious enough to stay there long enough to
23 get some news out to the people, but obviously that only
24 goes so far. And the media center in turn would have to be
25 evacuated. We do have an alternate location, and that is

1 essentially the Edison offices in Santa Ana.

2 Without going into an elaborate description of
3 the facilities, I would simply indicate that many of the
4 same kinds of equipment are at the Santa Ana headquarters.
5 There is space, although obviously it is not as well prepared
6 to have media briefings there.

7 Q What is the current status of the standard oper-
8 ating procedures for the operation and management of the
9 media center?

10 A The testimony on page 26 with regard to one of
11 the FEMA recommendations that all jurisdiction utility PIOs
12 establish an SOP, indicates at the end of that section at
13 the top of page 27 that this process of defining and writing
14 such an SOP is now underway and a draft SOP is being reviewed
15 by the PIOs.

16 There was a meeting last Thursday, the 20th of
17 August at which this draft SOP was reviewed quite thoroughly.
18 Suggestions were made as to better separation of what I
19 would call hardware information from the true SOP information.
20 That draft obviously is being revised, and at our meeting
21 which is tentatively scheduled in mid-September we expect
22 to, I hope, finalize it at that time.

23 I would like to point out that by a matter of
24 practice and review, I believe the people are competent to
25 perform their tasks, even if the SOP is in a draft stage,

k3
1 or what we would regard as an unfinalized stage.

2 Q So you estimate perhaps by the end of September
3 that may be finalized though, right?

4 A Yes.

5 Q The SOP?

6 A Yes.

7 Q Is there an alternative connection communication-
8 wise between the media center and the emergency operation
9 facility? I know that they are connected by telephone lines.
10 Do they have any radio transmission contact in case the
11 telephone lines are out?

12 A We have -- let's see -- we have some plans to
13 provide radio service as a backup, but I think one of the
14 best things about locating the media center is that it is
15 close, physically close to the EOF in the San Clemente Civic
16 Center, so a messenger service has been discussed, which
17 would probably be just as effective in the long run.

18 Q I take it then from your testimony that there is
19 a possibility that there will be an implementation of some
20 sort of messenger service between the two in case that that
21 communications could break down?

22 A We would be able to do this, yes.

23 Q But are there any current plans for having that
24 as part of the set-up?

25 A Well, it would be done as a backup, if, for

1 example, the telephone service were disrupted, we would
2 initiate a messenger service.

3 Q If this is beyond the scope of your testimony,
4 please feel free to so advise me, but could you explain
5 please the process of post-accident information distribution
6 from the time information that comes from the emergency
7 operations facility is distributed to the media center, how
8 that would then be distributed to the public?

9 MR. PIGOTT: You are talking about after the
10 information hits the media center?

11 MR. MC CLUNG: That is correct.

12 WITNESS CRAMER: The way I understand your
13 question, you are specifically referring to, I believe, how
14 the media gets the information to the public. The function
15 of the media center is to arrange for the processing of the
16 information and the giving of that information to the media
17 at the media center.

18 Now, the media center essentially receives
19 members of the press and the electronic media. Now, in
20 general we find that members of the electronic media have
21 what we call radio cars or TV cars. They have the ability
22 to communication back to their central stations with radios,
23 with TV sets. They are essentially self-contained vehicles
24 and would be able to radio or TV back their information.
25 That is what we have focused upon in the design of the media

5
1 center.

2 Q Okay. The media center then will take no --
3 they will just distribute the information that is received
4 from the emergency operations facility, is that correct?

5 A That is correct. If I may elaborate that a
6 minute, the testimony points out that we have some sub-
7 structure to the personnel who are at the media center. It
8 also points out that we have some capabilities to explain.
9 I believe it points out the fact that we have various brief-
10 ing boards, charts, maps, and things like that. So that we
11 would be able to explain to the media, live, on camera if
12 you will, the information which we would like to have por-
13 trayed to the public. That is the whole point.

14 In terms of distributing, I caught a connotation
15 of distributing a written press release, and I wanted to
16 make sure you understood it was more than that. It might
17 include that, but it would be more than just handing out a
18 short piece of paper.

19 Q So that there will be people there and the facil-
20 ities will, as you have testified, to expand upon the press
21 releases --

22 A Yes.

23 Q -- that are arriving from --

24 A Right.

25 Q -- the emergency operations facility?

1 A Yes, that is correct.

2 Q Do I understand from your testimony, then, that
3 the people there will be making -- will there be some deci-
4 sion-making function going on there about what to release
5 and what not to release, or would that all be taking place
6 at the emergency operations facility?

7 A Decision-making? May I give you a more elaborate
8 than a yes, no, answer?

9 Q Of course.

10 A Okay. Basically what happens at the media
11 center is that we would get information from San Onofre
12 during the early stages of the incident and during the later
13 stages of the incident from other emergency operating cen-
14 ters, the San Clemente Fire Department, the San Juan
15 Capistrano or Orange County. Due to the use of what is
16 called the interagency telephone system, other technical
17 information is circulated among and between these offsite
18 emergency operating centers.

19 Now to hopefully better explain that, there is
20 an exhibit, and the exhibit is ENC-12. It is Exhibit Number
21 77. That is complicated enough, but probably I ought to
22 put on the slide, so if you will pardon me for just a moment.

23 Now, what I am trying to show here is in these
24 squares, for example, up here in this square, the San
25 Clemente offsite emergency operations center, is one

1 telephone of a dedicated telephone network called interagency
2 telephone system, and technical information flows between
3 and among the stations. Now, we at the media center get a
4 portion of that information. We don't get a lot of the
5 detail. As a matter of fact, we probably get none of the
6 detail. We get information through a slightly different
7 channel.

8 People here are physically close to right here.
9 They are professionals in the business of gathering news
10 and publishing it. And as they see actions taking place,
11 information which should be sent to the media center, they
12 would send it over what we call here a teleputer. That is
13 described at some length in there, and that simply is a
14 device for sending hard copy -- written hard copy at the
15 same time to the emergency operating facility, the interim
16 EOF at the Fire Department, to the media center, back where
17 the public information officers are, and to Edison and San
18 Diego Gas and Electric Company corporate headquarters. So
19 that simultaneously it would appear as hard copy in all
20 those places.

21 In addition, the PIOs, the working PIOs have
22 telephones here and are able to call back to their emergency
23 operating centers or call over to their liaisons in the
24 emergency operating facility and get clarification, so that
25 when some happening occurs here, which is believed to be

x8
1 newsworthy, and this is telegraphed, in a sense, as a draft
2 press release, that these various media people here -- I am
3 sorry. I shouldn't use the term media people -- these
4 various PIOs here can be handed a copy, can call back to
5 their various off-site emergency operation centers for clari-
6 fication to find out the actions proposed by the response
7 agencies and add to this information.

8 Then once that information is pulled together
9 and this draft press release becomes expanded with the in-
10 formation for those response agencies taking action, then
11 this can be retyped and can be taken to the media room and
12 explained live on camera, with press releases, with diagrams
13 or whatever.

14 That is kind of a long, drawn out answer. I
15 didn't want to just answer a yes, no, on a decision-making
16 process and perhaps mislead you.

17 Q I appreciate your answer. It is very complete.
18 As far as the various emergency operation centers go, are
19 there provisions to -- in the event of an emergency -- ex-
20 clude the press from those areas?

21 A I would rather you ask that question of the wit-
22 nesses coming later who would represent those agencies. I
23 simply don't know the answer to that question. I can answer
24 to the extent that in the initial stages of incident, as
25 affects these jurisdictions, they would certainly be able

1 to explain the actions they are taking, if they are taking
2 action before the emergency media center is set up.

3 It is the purpose of the emergency media center,
4 however, to serve as a central gathering point for the media
5 so they won't get fragments here, there and yon, and be con-
6 fused.

7 Q How would the media be contacted to come to the
8 media room in the event there was some type of emergency?

9 A As part of -- may I turn this off? As part of
10 the normal day in, day out Edison and San Diego Gas and
11 Electric Company business of informing members of the media,
12 they have the ability to call by telephone various repre-
13 sentatives of the media. This actually was demonstrated
14 during the May 13th exercise and it is part of the normal
15 course of handling of Edison news to call the media when
16 there is some, what I would call fastbreaking type of event
17 which is deemed to be of media interest. Some events are
18 handled by press releases mailed out the day after.

19 But that is essentially how the media would be
20 notified, by telephone with a press release which indicates
21 something is happening at the facility of a certain magni-
22 tude.

23

24

25

ghp 1
1 Q What provisions are taken to provide shelter from
2 potential emergencies to media people who may be in the media
3 center?

4 A The media center is a public building and it is
5 essentially a basketball court attached to a series of small
6 rooms. If, for example, there were a small release of radio-
7 activity, the instruction to the whole city -- the area inclu-
8 ding the media center -- would be to take shelter. We would
9 most like -- most likely I would, since I am going to be there,
10 would be to instruct the media to follow me to the safe place,
11 and that is essentially an interior room with a minimum amount
12 of ventilation and we would instruct people to stay away from
13 windows. We would do as the little brochure says. We would
14 shut off ventilation, close doors, close windows and that sort
15 of thing.

16 Q In the event that the emergency escalated and the
17 media center operation had to be shifted, perhaps to the Edison
18 headquarters in Santa Ana, what provisions would be taken in
19 the interim, or do we have the capability of doing that switch
20 pretty instantaneously as far as communication lines going from
21 the facility?

22 A Again, let me refer back to this diagram here. The
23 San Onofre facility here would be able to communicate without
24 hindrance to Orange County and San Diego counties EOC's because
25 they are physically separated. It would depend upon a

ghp 2

1 circumstance where both of these EOC's would be effected. I
2 don't wish to testify in that area.

3 Coming down to your question, this computer terminal
4 here is in essentially the same location as here, or the opera-
5 tors can move from this location to these locations, closer to
6 the action in more sheltered locations and continue functioning.

7 Now directing your attention to this line down here
8 we show that this particular system, the so-called teleputer
9 system, actually passes through the Edison central computer and
10 then is sent to Edison business offices.

11 So essentially a duplicate of the computer -- the
12 teleputer -- consists as one dot among these many dots right
13 here which represents the Santa Ana business office. To that
14 extent the telecommunication equipment would still function,
15 even though we would relocate personnel from here to here.

16 We have back-up telecopiers in this area and tele-
17 copiers over here and we would be carrying the back-up tele-
18 copiers.

19 I believe in the long run the difficulty would be
20 simply the movement of the media from here to here, rather than
21 the communications difficulties.

22 Q There aren't any dedicated lines between -- tele-
23 phone lines -- for the cross checking, though, of the information
24 between the business offices and these emergency facilities; is
25 that correct?

ghp 3 1 A That is correct.

2 Q Could you describe briefly the orientation course
3 for the public information officers?

4 A If you are referring to what is Applicant's Exhibit
5 No. 76, ENC-11, the so-called SONGS Emergency PIO's training
6 session, which was essentially a training session in radio-
7 activity released transport concepts of radiation, radiation
8 effects and a table-top replay of the May 13th exercise, yes,
9 I can describe that.

10 If you are referring to something else, I think
11 you should be more specific.

12 Q I am referring to the -- that of course is part of
13 it but what I am referring to is on page 31 at the top of the
14 page which comes right after the reference to the exhibit that
15 you were just talking about, about orientation programs for
16 news personnel, news media personnel.

17 A I am sorry, would you give me the line number, as
18 well as page 31?

19 Q The top of the page, line 1.

20 A Oh, a similar orientation for news media will be
21 held. That is not the subject of Exhibit No. 76, which was for
22 the public information officers. We are in the process of
23 planning that right now and basically it falls into several
24 sections, one of which I would call administrative detail.

25 Simply said, it acquaints the incoming media personnel

ghp 4
1 with the facility, the Boys and Girls Club facility, even though
2 I suspect that several members of the news media will have par-
3 ticipated in the May 13th exercise and will be somewhat familiar
4 with this.

5 Essentially we will go over with them the circum-
6 stances under which the media center would be set up, rehearsing
7 for them some of the same indications of how we would get to
8 them the information to come to this place.

9 In addition to that, we will cover some of the same
10 information about the emergency plan that we have already sent
11 out to the individual householders, and again I was referring
12 to Exhibit ENC-1, whatever its number is, which contains the
13 details of the emergency plan insofar as the individual resident
14 or transient. We would explain that.

15 Then in addition to that we would give them some
16 basic information on radiation. Referring to Exhibit No. 76,
17 ENC-11, which is this one day's training program for the emer-
18 gency PIO's, since that was a full day, we envision half to
19 two-thirds of a day for media personnel. It would probably be
20 a condensation of some of the information there.

21 So to summarize, we would give some administrative
22 details, a tour of the facility, show them the floor plan, ex-
23 plain the accreditation process, explain the fact that we ex-
24 pect perhaps some of the media personnel to arrive there before
25 our trained corporate communication personnel arrive and to be

ghp 5
1 patient.

2 Then we would explain the details of the emergency
3 plan. We would explain something about radiation and radiation
4 transport, something about the nuclear reactor itself.

5 Q What portion of your ENC-1, in your judgement, will
6 indicate to the people who receive that, that it is extremely
7 important that they keep that document in a safe place?

8 A Well, specifically referring to this ENC-1, on the
9 front -- there is a front. It is this portion here which looks
10 a little bit like a letter and is signed by the Chairman of the
11 Board of Southern California Edison Company and it is addressed
12 to dear resident.

13 It would be the logical beginning place for anyone
14 simply opening the packet. We develop in the second paragraph
15 here the purpose of the folder, which I will read.

16 Quote: It is to help familiarize you with those
17 actions you may need to take in the event of an emergency, close
18 quotes.

19 I think the specific answer to your question is in
20 the next paragraph. It says: Keep this folder in a handy place,
21 in a bulletin board in your home, in your car or where you work.
22 Please insure that all members of your household have read and
23 understand this information.

24 Q In your opinion, do you think that is stern enough
25 language to keep people from throwing that thing away?

ghp 6

1 A I think you have to read that in context with the
2 other information which is developed further. For example, if
3 I received a document every day with this language, I would
4 probably want to learn more about the contents before I reached
5 a judgement.

6 If I looked inside and I found, as I do here, for
7 example, very useful and handy information about public notifi-
8 cation of an emergency and the very opening line it says:
9 Public notification of a serious emergency will be -- and it
10 tells me how to get the information at those frequencies. I
11 would think that would be pretty important information to have
12 at any time for any particular cause, whether it be a fire or
13 if it be a truck or automobile accident on the freeway which
14 releases poison gas or something like that.

15 I would read on further and I would find information
16 about what to do during an emergency and that would reach me,
17 quite personally, and I think it would reach most people. If
18 you get advice on what to do in an emergency, you tend not to
19 discard that willy nilly.

20 There is some information on here about evacuation,
21 on reception and care, preparing for an emergency, things to do
22 and not to do. I think you have to read this in the total con-
23 text of being a very useful document and so being envisioned
24 by the recipient.

25 I guess in a short answer I would say, no, a letter

ghp 7
1 from a stranger saying, keep this document, would not impress
2 me nearly so much as reading the document and seeing that it is
3 a very useful-type of a document.

4 Q Regarding some of the instructions in the exhibit,
5 could you explain the reason why you are not supposed to turn
6 off your gas or electricity in the event of an emergency?

7 A I think you are referring to the lower right-hand
8 corner here. It says, in the event of an evacuation, don't do
9 the following: turn off main gas valve; turn off all electric
10 power at the switchbox.

11 In general I think it is not needed. For example,
12 the reason for an evacuation is precautionary and it might be
13 ordered at some time when it turns out that people can come back
14 in two or three hours, four or five hours, something like that.

15 We have had experience in the past where electric
16 service is lost for a period like this. Refrigerators spoil,
17 it creates a mess, water overflows and things like that, and I
18 believe it is a judgement of the people who made emergency
19 response plans that this was not needed. That is how I would
20 explain it.

21 Now as to precise requirements, as to why that was
22 built into the response plans from which this public information
23 document was taken, I think if you want to go much further, you
24 should ask those witnesses.

25 Q The point has been raised that the document appears

ghp 8

1 to refer to general emergencies rather than specifically fo-
2 cusing, although it is obviously having to do with the San
3 Onofre plant. It doesn't focus on that and some other emergency
4 preparedness instructions indicate, for example, in the event
5 of an earthquake, to turn off those particular types of utili-
6 ties and this is why this might create some confusion.

7 MR. PIGOTT: Is there a question pending?

8 MR. MC CLUNG: Pardon me, no.

9 MR. PIGOTT: Okay.

10 MR. MC CLUNG: I apologize here. I need to take
11 about a minute to assemble my thoughts, as I have come to a
12 crossroads in my notes.

13 BY MR. MC CLUNG:

14 Q Okay, the final line of questions is going to have
15 to do with a specific problem, and that is the San Onofre Beach
16 area and the State Parks. I want to ask a few questions re-
17 garding the public information down there.

18 In regards to that, I would like to have you turn
19 to your exhibit which you have printed up there, the flier for
20 that particular park. I don't know what the number is. I
21 tried to come up with it but I was unable to.

22 A You want the flier for --

23 Q For the San Onofre State Beach, Bluffs Beach and
24 campgrounds.

25 A That is Applicant's Exhibit No. 27 or ENC-21.

1 Q Is there any information in that flier that describes
2 what to do in the event that there is a siren?

3 A Well, let's see, if I can read some of this from the
4 flier --

5 JUDGE KELLEY: Can we have the ENC number from that
6 exhibit?

7 WITNESS CRAMER: It is ENC-21.

8 JUDGE KELLEY: Thank you.

9 WITNESS CRAMER: I think the instructions here
10 begin: Public notification of a serious emergency will be by
11 sirens or public address system.

12 Reading on down here: If you have a radio, for
13 example, in your automobile or if you are instructed to evacuate
14 and you are in your automobile and wish to follow what is hap-
15 pening, here is how to tune into a local radio station and
16 get follow-up information.

17 Then specifically there is a what-to-do section
18 and the what-to-do is broken down into two sections, one of
19 which is called, if you are asked to await further instructions
20 and the other is, if you are asked to evacuate.

21 I would say the information you are seeking is con-
22 tained either in this section here -- what to do if you are
23 asked to evacuate -- or the other one is, if you are asked to
24 await further instructions.

25 ///

1 BY MR. MC CLUNG:

2 Q Does it indicate anywhere in those references that
3 the siren might mean that there is a radiological emergency at
4 the nuclear plant?

5 A No, I do not believe that exists.

6 Q Is there any information on the flier that says
7 that the instructions have anything to do with the San Onofre
8 Nuclear Generating Station? In fact, is the power plant men-
9 tioned on the flier?

10 A It is listed right here as San Onofre Nuclear
11 Generating Station and I think I can answer you question if you
12 will let me go just a little bit from the yes, no format.

13 We were actually asked by the park personnel not
14 to be specific or limit this just to nuclear alone because they
15 foresaw that there would be other things that this would be
16 useful for.

17 Q In your opinion, does that limit its utility as an
18 information device for people who are using that park which is
19 in very close proximity to the nuclear generating station?

20 A No, I think it broadens its usefulness and may I
21 explain that?

22 Q Of course.

23 A When you have some kind of a serious emergency, as
24 it is called here, and you are away from your home, you are a
25 transient, you are on the beach. I hope you will have an

ghp 2

1 automobile and you are not terribly far from your automobile.
2 The traditional way of protecting oneself in one's home is
3 either to stay informed, to take shelter which, in the context
4 of the pamphlet, ENC-1, means to turn off ventilation, to close
5 windows, to close doors and take shelter in essence.

6 Here there is very little chance of taking shelter
7 so basically the two alternatives are to stay informed and
8 gather your belongings, and that is specifically covered right
9 here. It says, if you are asked to await further instructions,
10 gather your family and belongings and follow the instructions
11 of the rangers and lifeguards.

12 The ultimate protection, of course, is if you are
13 asked to evacuate. So I would say not having a flier or a
14 poster which is specific to nuclear broadens its usefulness.
15 I don't think it harms the ability to take constructive action
16 in case of a nuclear attack emergencies.

17 Q Are any types of hazards mentioned on the fliers?

18 A Types of hazards?

19 Q Types of potential emergencies?

20 A In this locality it says, serious emergency. In
21 this locale it says, emergency. Now over here it says, in the
22 event of a fire or hazardous chemical spill, you may be safer
23 on the beach.

24 Q In other words, it makes specific mention of a spe-
25 cific type of emergency, a fire or a serious chemical spill, but

ghp 3
1 there is no mention in the document of a potential radiological
2 emergency; is that correct?

3 MR. PIGOTT: I think that has been asked and
4 answered and is becoming argumentative.

5 MR. MC CLUNG: I apologize. I withdraw the question.

6 BY MR. MC CLUNG:

7 Q Do you think the fact that the document provides
8 that you should not evacuate unless you receive official in-
9 structions to do so, taken together with the fact that there is
10 no mention of potential radiological emergency in the document
11 itself, that when the siren goes off and the people do not leave,
12 that it may be more detrimental to their health not knowing that
13 the siren could potentially mean that there was a radiological
14 emergency at the plant?

15 MR. PIGOTT: I think that is calling for speculation
16 at this point. I think we have been through what the types of
17 warnings are going to be. The witness has stated that it is
18 designed to be a general type of instructive document. There
19 are not simply sirens. I think we are getting beyond the pro-
20 bative value of the questions.

21 JUDGE KELLEY: I am not sure about the speculative
22 part. I am not quite sure I understood the question. Now may-
23 be if you restate it, I will think it is speculative, but could
24 you have another go at it?

25 MR. PIGOTT: I was speculating as to its meaning, too.

ghp 4
1 BY MR. MC CLUNG:

2 Q There is a specific recommendation made as to the
3 specific hazard in the brochure you have testified to. In
4 other words, in case of a fire you may be better off staying
5 on the beach; is that correct?

6 A I was reading words here, yes.

7 Q I won't go into the prior testimony. Do you think
8 that that particular piece of information could confuse someone
9 who had received a flier at the beach so that in the event of
10 a radiological emergency and a siren, he would think that was
11 because there was a fire and stay on the beach, which might be
12 detrimental to his or her health and safety?

13 A As I understand the question, I think we need to
14 point out that in addition to just hearing those sirens, there
15 would be rolling public address systems operated by the rangers
16 and the lifeguards and supplementary news broadcasts and I think
17 this would make it quite clear.

18 In addition I would think that if, for example,
19 there were a fire, it could be up here on the other side of the
20 highway where there is a lot of tinder -- and I think there
21 have been fires in that area -- and it could be conceivable that
22 at night this could be activated by the park rangers as a pre-
23 cautionary measure and the same way along this highway here.
24 There could be chemical spills.

25 So in that case I think the rangers don't want to

ghp 5

1 trigger people into an automatic action. They want to maintain
2 some control over the people and I believe they have that capa-
3 bility to define the situation further.

4 Q In your opinion, though, with respect to a radiolo-
5 gical emergency, do you think it would be a good idea to have
6 a specific mention of it in the document along with the fires
7 and the chemical spill which is mentioned there, as a potential
8 thing?

9 A I doubt seriously if that would add greatly to the
10 credibility of park rangers, sirens, public address system and
11 that sort of warning of events like this, serious emergencies.

12 Q Is it your testimony then that the siren system
13 can be used in the event of a fire?

14 A No, I don't believe I said that.

15 Q Is there any reason why the siren would go off other
16 than a radiological emergency?

17 A I believe a previous witness testified to the general
18 nature of the sirens. I forget exactly the terminology he
19 used, but I believe it was not specifically to only being used
20 in the case of a radiation escape at San Onofre.

21 MR. PIGOTT: I think we are going beyond Mr. Cramer's
22 knowledge of exactly how the sirens will be used.

23 MR. MC CLUNG: Okay, but I am referring to the
24 document -- the exhibit -- that we are discussing and it says
25 in the first paragraph, as Mr. Cramer has testified, that the

ghp 6
1 sirens might go off, but nowhere does it ever say that that may
2 mean there is a radiological emergency and Mr. Cramer has
3 testified that if there is a fire or something like that, or a
4 chemical spill, which are the only specific things that are men-
5 tioned in the leaflet, that the sirens wouldn't go off.

6 MR. PIGOTT: No, he has not testified to that.

7 MR. MC CLUNG: Okay, is that beyond the scope of
8 his testimony, Mr. Pigott?

9 MR. PIGOTT: If you question is, under which cir-
10 cumstances would the sirens be used -- which I think is the
11 thrust of it -- my answer is yet.

12 MR. MC CLUNG: Will they ever be used.

13 MR. PIGOTT: You are beyond the scope of his tes-
14 timony.

15 JUDGE KELLEY: You are beyond the scope, I think.

16 MR. PIGOTT: You are back to Mr. DuBois, who did
17 describe where the control centers will be and who will acti-
18 vate them.

19 MR. MC CLUNG: Let me try and stay within the scope.

20 BY MR. MC CLUNG:

21 Q I am trying to refer to this particular document
22 which discussed the use of the sirens. It clearly implies that
23 the sirens will clearly be used in the case of a fire.

24 JUDGE KELLEY: Could you point to the exact words
25 about the sirens and the fire?

ghp 7
1 MR. MC CLUNG: The first paragraph says: Public
2 notification of a serious emergency will be by sirens or a
3 roving public address system operated by park rangers and life-
4 guards and by news broadcasts.

5 JUDGE KELLEY: Okay. Are you the author of this
6 prose?

7 WITNESS CRAMER: No, sir.

8 JUDGE KELLEY: Okay.

9 BY MR. MC CLUNG:

10 Q Then down in the paragraph, if you are asked to
11 await further instructions, the third sentence says: In the
12 event of a fire or hazardous chemical spill, you may be safer
13 on the beach.

14 MR. PIGOTT: Well, you missed a very critical sen-
15 tence in there.

16 MR. MC CLUNG: I probably have missed several.

17 MR. PIGOTT: It says, the action that you are asked
18 to take will depend on the nature of the emergency. In the
19 event of a fire or hazardous chemical spill, you may be safer
20 on the beach.

21 MR. MC CLUNG: Okay, but what I am trying to get at
22 is that the thrust of this document to a person who receives it,
23 and a siren goes off, there is no mention in here of a radiologica
24 emergency. There is only a mention of a fire.

25 JUDGE KELLEY: That is correct, and you asked him,

ghp 8
1 didn't you, whether or not he thought it would be a more ef-
2 fective document if it referred to a radiological emergency and
3 he, in effect, said, no, he didn't think so. He gave a rather
4 longer answer, but that was the response. Now where are we?

5 MR. MC CLUNG: Here is where we are.

6 JUDGE KELLEY: Again, you might agree with it and
7 maybe I don't either but you have already asked that question.

8 MR. MC CLUNG: I want to know whether --

9 JUDGE KELLEY: Now where are we, given where we
10 have been.

11 MR. MC CLUNG: I am trying to figure out where we
12 are. What I am trying to ask is whether or not -- and
13 Mr. Pigott, please feel free to butt in -- whether or not --

14 MR. PIGOTT: I will object if it is necessary.

15 JUDGE KELLEY: Okay, we are getting a little loose.
16 Maybe it is time for coffee but I would like to wrap this up.
17 I thought we could finish with this witness.

18 MR. MC CLUNG: We are going to,

19 JUDGE KELLEY: So let's do that. Given the dis-
20 cussion that we have had, given the witness' testimony and
21 responses to your question as to whether or not this would be
22 a more effective document if it referred specifically to a
23 radiological emergency, what beyond that do you want to ask him?

24 MR. MC CLUNG: What I am trying to figure out is
25 whether the document, in fact, is potentially misleading a

ghp 9
1 beachgoer into making -- in effect a worse hazard by misleading
2 the person into thinking that there is possibly a fire and so
3 they will go out and stand on the beach to protect themselves
4 from the fire and, in effect, be irradiated by the plant which
5 is, you know, hundreds of yards away.

6 There is no mention in the document so what I want
7 to ask is whether the sirens can mean anything but a radiological
8 emergency.

9 BY MR. MC CLUNG:

10 Q As far as when you drafted this document, what did
11 it mean? What is the word siren put in there for?

12 MR. MC CLUNG: I think I should be able to ask that.
13 Why is the word siren in there at all?

14 MR. PIGOTT: Is there a question?

15 MR. MC CLUNG: Yes.

16 JUDGE KELLEY: Yes, why is the word siren in the
17 document.

18 WITNESS CRAMER: Because it is one of several means
19 of public notification which include -- and I quote -- roving
20 public address systems operated by the park rangers and life-
21 guards.

22 BY MR. MC CLUNG:

23 Q Are you aware that the emergency plan for the state
24 park provide for precautionary evacuation in the event of an
25 alert-class accident at the San Onofre Station?

1 A I actually thought it was at the site emergency
2 level.

3 MR. PIGOTT: I think you are beyond Mr. Kramer's
4 area of expertise when you go into that.

5 MR. MC CLUNG: All right, I will strike that ques-
6 tion.

7 BY MR. MC CLUNG:

8 Q Could you describe briefly how the park officials
9 will get the information to the people on the beach in the
10 event the sirens go off of what the problems are in the event
11 of a radiological emergency?

12 MR. PIGOTT: I am sorry, but are you asking now --
13 I think what you are asking is the park rangers' emergency
14 plans and again -- the witness can correct me -- but I don't
15 think that is within the scope of his testimony.

16 MR. MC CLUNG: Part of his testimony has to do with
17 public information and the 15-minute requirement, doesn't it,
18 under NUREG 0654? Isn't that part of what we are talking about?

19 MR. PIGOTT: I just made my objection. I think it
20 is beyond the scope. The witness can answer as to whether it
21 is, but I believe we are beyond the scope of his testimony.

22 JUDGE KELLEY: Could you restate it please?

23 BY MR. MC CLUNG:

24 Q How will the people on the beach be notified within
25 the 15 minutes required in the event of an emergency?

ghp 11

1 A I can answer all the part except the 15 minutes
2 and I think it is right here in black and white, that the public
3 notification of this serious emergency is by sirens and these
4 roving public address systems operated by the park rangers and
5 the lifeguards.

6 There is also word of mouth if they don't happen to
7 have the public address systems handy.

8 I cannot testify to the rapidness of the response
9 to this. This is totally outside my area.

10 MR. MC CLUNG: That finishes my question. I would
11 like to make a motion at this time to strike portions of the
12 testimony. I will do it at a later time or whenever it is
13 convenient.

14 JUDGE KELLEY: Right now let's take a coffee break
15 and we will decide how to handle that.

16 (Brief recess.)

17 ///
18
19
20
21
22
23
24
25

718 kl

1 JUDGE KELLEY: Okay, we are back on the record.
2 Mr. Hoefling, does Staff have cross-examination?
3 MR. HOEFLING: We have just a clarifying ques-
4 tion or two.
5 JUDGE KELLEY: All right.
6 MR. MC CLUNG: Pardon me, Mr. Chairman?
7 JUDGE KELLEY: Yes.
8 MR. MC CLUNG: I was about to make a motion to
9 strike.
10 JUDGE KELLEY: Oh, I am sorry. Yeah, let's --
11 MR. MC CLUNG: And I can wait on that until
12 after everybody has asked. That would be fine with me, but
13 I --
14 JUDGE KELLEY: Why don't we finish up the --
15 MR. MC CLUNG: They might want the --
16 JUDGE KELLEY: -- questioning.
17 MR. MC CLUNG: -- advantage of redirect after I
18 do that.
19 JUDGE KELLEY: Why don't we finish up the ques-
20 tioning, at least up through the Board, and then we will
21 see where we will go from there. And you can renew that.
22 But rephrase it again. Okay.
23 CROSS EXAMINATION
24 BY MR. HASSELL:
25 Q Okay, Mr. Cramer, my question, I believe, is

1 primarily one that seeks some clarification. On page 29 of
2 your prepared testimony you referred to one of the FEMA
3 recommendations that was directed towards improvements in
4 the emergency media center, specifically the fifth recommen-
5 dation. That recommendation in part indicates that the
6 utility should be able to establish media center operations
7 at least at the alert stage within roughly 15 minutes.

8 You go on on page 29 to talk about how the
9 essential elements of opening the emergency center could be
10 done within 15 minutes.

11 My problem is this. On page 32 you talk about --
12 well, specifically, lines five through eight, you indicate
13 that the transit time for the PIOs could be up to several
14 hours, and my question is could you please briefly explain
15 how you would be able to get the emergency media center
16 operational within roughly 15 minutes if you have got POIs --
17 PIOs, excuse me, arriving in several hours.

18 A Okay. I will try that. Referring back to page
19 29, the recommendation we read as having a comma between
20 two parts, the first part being the utility established
21 the media center operations at at least the alert level,
22 comma, and that set up time be no more than about 15 minutes.
23 And we go on in the discussion to point out that yes, we can
24 make arrangements so that within 15 minutes of the arrival
25 of the initial Edison or San Diego Gas and Electric Company

1 public contact person, we can put in all the physical equip-
2 ment. We also point out in that section -- and this is on
3 page 30, the top of the page -- the time at which full opera-
4 tion of the emergency center must depend to a certain extent
5 on the speed with which an agency PIO moves to his or her
6 emergency operation center, is briefed, and then moved to
7 the emergency media center.

8 And that discussion there on the top of page 30,
9 as you pointed out, is picked up later on page 32 with an
10 indication that there may be up to several hours' time before
11 all of these PIOs would arrive. Specifically that several
12 hours, I believe, refers to some of the PIOs who live, say,
13 in San Diego, therefore would have a certain amount of tran-
14 sit time.

15 We have discussed that in the -- in trying to
16 derive this SOP, and essentially, I believe, that depending
17 upon the exact level of the emergency, and the communications
18 which exist at the time and the situation which exists at
19 the time, that we would open the media center and we would
20 give out such information as we have, and at the alert level
21 in general, I believe that the various offsite agencies are
22 not taking drastic action, so that we would be in the explain-
23 ing what is happening mode, and most of that information
24 would be coming from the utilities.

25 Did that help a little bit?

1 Q That helps me, yes. Thank you.

2 A Okay.

3 JUDGE HAND: Mr. Cramer, I don't know exactly
4 where all these state beaches are that are in your exhibits
5 ENC-17 to 24, but if I look specifically at your ENC-17, can
6 you tell me where that San Onofre State Beach Boston camp-
7 ground is? It what, is south of all the towns mentioned,
8 and immediately south of the reactor?

9 WITNESS CRAMER: Let's see. The Bluff's Beach,
10 if you can see this, sir, right here is San Onofre Generating
11 Station, and this whole area right here is the Bluff's Beach
12 and campgrounds. Essentially camping takes place up on the
13 highway and beaching takes place down on the beach.

14 JUDGE HAND: Okay. Now, specifically in these
15 instructions that relate to what happens in the event of an
16 evacuation that tells you what to do, it tells you to go
17 home if you are a resident and await further instructions,
18 and I gather that if you are a resident of San Clemente,
19 Capistrano Beach, Dana Point or San Juan Capistrano, those
20 are all north of this point, or north along the highway?

21 MR. CRAMER: I am sorry. Do the following, which
22 is right down here. It says go home if you are a resident
23 and await further instructions. Then it says instruction
24 five is go south ten miles at least to the city of Oceanside.

25 JUDGE HAND: If you are not a resident?

k5

1 WITNESS CRAMER: Yes.

2 JUDGE HAND: Well --

3 WITNESS CRAMER: The --

4 JUDGE HAND: Well, what is the difference between
5 residents who go north and non-residents who go south, or
6 am I confused about this?

7 WITNESS CRAMER: No, I think that is a legiti-
8 mate -- it is my understanding that as a precautionary mea-
9 sure, the rangers might ask for an evacuation of the beach
10 before there is an evacuation of the town, and so this simply
11 asks the residents to go to their homes and await further
12 instructions because this might be precautionary evacuation
13 of the beach.

14 JUDGE HAND: Okay. This document, your ENC-17
15 and the rest of them in that group, all carry a circular
16 seal which isn't very clear on my Xerox copy, but I peaked
17 at the larger one on your desk, and it looks something like
18 a seal of California Division of Parks and Beaches, or what-
19 ever they call themselves. What -- exactly what is that
20 seal doing there, the circle with the bear in it?

21 WITNESS CRAMER: The circle with the bear,
22 which occurs right here, is the seal of the Department of
23 Parks and Recreations -- California Department of Parks and
24 Recreation, and it is sort of an official imprimatur. That
25 is, under the control of the State Parks and Recreation

1 Department, and this makes it an official document of their
2 issuance.

3 JUDGE HAND: It is their document, not the
4 Applicants' document? Did you answer? I am sorry.

5 WITNESS CRAMER: I am not sure if there was a
6 question. Would you please repeat the question?

7 JUDGE HAND: Whose document is this then?

8 WITNESS CRAMER: Well, I can give you the answer
9 that this is issued by the State Parks and that is their
10 official seal. Edison paid for the production of the docu-
11 ment. Does that get to the heart of your question, or have
12 I missed it?

13 JUDGE HAND: And was it the Department of Parks
14 and Recreation's decision not to say anything about a nuclear
15 emergency or release of radiation?

16 WITNESS CRAMER: To the best of my knowledge,
17 yes.

18 JUDGE HAND: Yes, that is helpful. Thank you.
19 In your testimony you made some nice positive statements on
20 page eight. You say what will be done to get information
21 to new residents as they come into the area, and then you
22 speak, starting on line 10, annually thereafter residents
23 and organizations will be reminded of the program's exis-
24 tence. This will be done, and so forth.

25 That is all very positive. And the next

1 paragraph after that has at least each of the next three
2 sentences have the word would, which sounds to me like some-
3 thing less than will, and then as I went on and got over to
4 page 12, and you speak again about new occupants, both of
5 residences and business locations, and on page 19 you have
6 the nice positive statement they will receive copies. And
7 you said the same thing up on line 14 -- will be mailed.

8 But then you proceeded -- you go ahead and
9 follow it in the next paragraph that additional information
10 of a similar nature would be provided. These would be
11 placed. And then when I get over to page -- this is a single
12 question in spite of its convoluted nature. Page 17, start-
13 ing about line 11, that word would turns up again. Line 17,
14 something could be communicated. Lines 21 and 22 there are
15 more actions that would be taken. We find about five more
16 woulds on the next page, page 18.

17 What -- why, when you made the nice clean state-
18 ment that there will be a annual program, that new people
19 will be notified, why do you switch over to that would?
20 What -- why less than that very positive commitment, which
21 I read the would to be?

22 WITNESS CRAMER: Without picking up each of
23 these instances and reading it word by word, I would suspect
24 that we put this into more of a future -- in the future we
25 will do this, perhaps amongst other things, or perhaps

1 containing this kind of contents. May I amplify a little
2 it here?

3 JUDGE HAND: Yes.

4 WITNESS CRAMER: Or give you an example? On
5 page eight, in lines six to nine, I think we point out that
6 each time a new resident applies for electric service, he
7 or she will be given the complete information for the resi-
8 dence. That is ongoing. In July -- in June, I believe,
9 about 450 persons like that were identified and were mailed
10 information, and that is ongoing.

11 In the same way, we intend here, I think, almost
12 regardless of whether will or would, is to do that kind of
13 thing.

14 JUDGE HAND: It sort of startled me, having
15 gotten the nice positive wills that you pointed out on page
16 eight, you got over to page 19 and you said up at lines
17 three, four, five and six -- you say in summary, a cycle of
18 this public information would be repeated at least annually
19 and information needs reviewed. Can you substitute the word
20 will for would? Will you substitute the word will?

21 WITNESS CRAMER: Yes, I will and yes I would
22 substitute on page 19, line four.

23 JUDGE HAND: So it is --

24 WITNESS CRAMER: That is a commitment, yes. We
25 read that as a commitment. That is not a weasel word.

1 JUDGE HAND: All right. In fact, I had written
2 a note, the weasel word. But that was for my information,
3 not for yours, but you got it out of me. Thank you. I
4 think then that in many instances what you have told me is
5 that you really mean you intend to, you will do those things,
6 and for your own stylistic reasons you chose to use would --

7 WITNESS CRAMER: Yes.

8 JUDGE HAND: -- trying to get some future item
9 into it? And one last question to ask you. One page 18,
10 starting at line 21, you say, for example, after the initial
11 information is broadly disseminated, during the summer of
12 1981 -- that is essentially done now, is it? Is this broad
13 dissemination over now?

14 WITNESS CRAMER: Well, not totally. The initial
15 information would -- excuse me -- does include -- let's try
16 that -- the initial information to my mind does include the
17 handbook which will be mailed out, as I have said before,
18 within approximately two months.

19 JUDGE HAND: All right, and to continue that
20 sentence, a bill insert might be used, and then on the next
21 sentence, another bill insert might be mailed out. Those
22 I am to read for just what they are? Those are decisions
23 that have not been made?

24 WITNESS CRAMER: Might I explain this a little
25 bit? I think you are raising a quite valid point, and it

10
1 goes back to utility economics in certain terms like bill
2 inserts, and again, this isn't quite my area of testimony.
3 We may need some supplemental here, but in essence, many of
4 these publications such as bill inserts come somewhat under
5 the financial control of the public utilities commissions,
6 and for example, I understand that we would like to have a
7 bill insert mailed out in the near future through San Diego
8 Gas and Electric Company, because these are their electric
9 customers.

10 However, for reasons I don't understand, the
11 bill insert or the money to make a bill insert, or the con-
12 tents of the bill insert for this particular billing cycle,
13 was agreed to or determined by the Public Utilities Commis-
14 sion, so San Diego Gas and Electric Company can't produce
15 what is called a bill insert. That is to say, a piece of
16 paper which goes into the same envelope.

17 Now, if you will pardon me here -- another non-
18 exhibit -- what we brought along here, and what you can't
19 see very well because I have no Xeroxes, is something that
20 will be mailed out within the next two weeks as a special
21 mailing, again to the San Diego Gas and Electric customers
22 within this same area, and it just simply says -- and if I
23 will read this, "in compliance with Nuclear Regulatory
24 Commission regulations, nuclear emergency response plans for
25 about a ten-mile area surrounding San Onofre Nuclear

1 Generating Station have been developed by local government
2 agencies and jurisdictions. As a resident of San Clemente,
3 San Juan Capistrano, Capistrano Beach or Dana Point, you
4 should have received these instructions in the mail. If
5 you did not receive these instructions, please fill in this
6 card and drop it in the mail. And then it closes by your
7 name, your address, city and zip, and it is essentially
8 signed by San Diego Gas and Electric, and Southern California
9 Edison Company.

10 Now, the back of this, when it is finally printed,
11 would have a return address, and I understand it would have
12 a -- what is the technical term for -- you don't have to
13 put a stamp here, that postage will be paid by the return
14 addressee. And this will go out in an envelope to this same
15 class of people.

16 Now, that is why it is rather difficult sometimes
17 to promise that you will do a bill insert, and then find out
18 later you don't have the capability. That is one of our
19 little awkwardnesses here about the wills and the woulds.
20 Should we exhibit this, or --

21
22
23
24
25

tn#19-1

1 MR. PIGOTT: You've read the contents into the
2 record. I think that's sufficient.

3 JUDGE HAND: Your ENC No. 1 starts out with
4 that letter headed Volume 1 May 29, 1981. That was
5 independently mailed, that was a separate mailing.

6 WITNESS CRAMER: Yes. And I believe you have
7 here the envelope which also includes two similar return
8 cards.

9 JUDGE HAND: One last thing about that ENC-1.
10 There was some question about, when Mr. McClung was talking
11 to you, about where the ten mile line came with reference
12 to Dana Point and the marina and so forth. Does that
13 northwestern boundary of the areas that are labeled 9 and 8,
14 is that in fact a boundary of San Diego Gas & Electric
15 Company's service district?

16 WITNESS CRAMER: No. I think the boundaries
17 go a little bit further off-side the colored areas.

18 JUDGE HAND: I tried to compare it to Southern
19 California Edison's service district. They are very differ-
20 ent scales, but there is a curious irregularity of the
21 southern boundary of SCE's district and where it meets San
22 Diego, and it looks like it matched it. But if it doesn't,
23 it doesn't.

24 WITNESS CRAMER: Right. One of the things I did
25 to educate myself was to get a map of the San Diego Gas &

1 Electric Company territory in this area and make that same
2 comparison.

3 JUDGE HAND: Thank you.

4 MR. PIGOTT: I think someone can confirm it
5 better later, but the mystery as to the boundaries of 9,
6 I believe, is that that is the zip code designation for the
7 area of Dana Point, which obviously makes it easier for
8 mailings, other information-type things. And as was pointed
9 out, it is an unincorporated area but the Post Office has
10 still drawn some boundaries on it. I believe those were
11 used.

12 JUDGE KELLEY: Mr. Cramer, on page 38 of your
13 testimony, that's the page at which you begin to speak to
14 various aspects of emergency planning by San Diego Gas &
15 Electric. I just wondered about your qualifications to do
16 that. You are an employee of SCE, is that correct?

17 WITNESS CRAMER: Yes, I am.

18 JUDGE KELLEY: Well, perhaps you could respond.

19 WITNESS CRAMER: Okay. What I did to obtain
20 this testimony was to request this officially of San Diego
21 Gas & Electric Company. Now over and above simply taking
22 someone's product, I am familiar with some of the items in
23 here to the extent that, for example, if you notice on page
24 38, lines 14 and 17, it says there's also a Southern California
25 Edison terminal printer in the center, et cetera, et cetera,

3 1 et cetera. I happen to have been very instrumental in
2 having that terminal printer installed. I trained the
3 operators to operate that. I'm sort of a caretaker on that.
4 While doing this I made myself familiar with the equipment
5 in the so-called customer information -- I'm sorry -- the
6 emergency communication center, which is essentially lines
7 5 through 14. I'm familiar with the Edison equivalent
8 process for many of these statements here about the news
9 department, the customer information supervisors, things
10 like that.

11 Again, on page 39, I caused local people at the
12 San Clemente office of San Diego Gas & Electric Company to
13 have this reviewed and material supplemented to increase the
14 degree of coverage of the San Clemente office's capability.
15 So yes, it's correct I'm not an employee of San Diego Gas
16 & Electric Company. But I did obtain this particular informa-
17 tion and checked it out to the best of my knowledge.

18 JUDGE KELLEY: Thank you. Going back to Dr.
19 Hand's point about the will and the would commitments, I
20 believe you testified that you did regard these statements
21 as commitments by the company to do what they said they
22 would do.

23 WITNESS CRAWFORD: To the best of our ability to
24 carry them out.

25 JUDGE KELLEY: Okay. Let me shift this from

4

1 you for the moment to Mr. Pigott. It is really a legal ques-
2 tion that I want to put to you and you wouldn't necessarily
3 have to respond right now, but you can come back with a
4 response after you have thought about it. My question is
5 this: does the Applicant regard commitments of this nature
6 on the record in this proceeding as legally binding commit-
7 ments so that, for example, they have the same force and
8 effect as an explicit condition in the license?

9 What I'm thinking about -- and I don't want to
10 be mysterious about this at all -- there's been some signifi-
11 cant amount of debate about this question for the Commission
12 in recent years and there was a specific case involving the
13 Bailey reactor where there had been, so it was argued, a
14 deviation by the company from some construction plans that
15 they had set forth in the PSAR that they had filed. It had
16 to do with the foundation piles for the reactor. And Mr.
17 Casey knows the case. So you are familiar with it.

18 The Commission ruled on that and it went off
19 to the Court of Appeals and the Court of Appeals reversed
20 the Commission rather recently, so that it's an area, I
21 think, that's a little bit gray and debatable. I suppose
22 no one would debate the legal force and effect of an explicit
23 condition in the license and if you want to, you know, make
24 sure that some commitment is legally binding that's what
25 you do. But there is the further question of whether state-

5 1 ments by witnesses or statements in the FSAR, let's say, are
2 legally binding in the sense that a deviation from them later
3 on could result in some kind of enforcement action by the
4 Commission, I suppose to and including license suspension or
5 revocation.

6 So I would just like to have your view on that
7 question. You needn't --

8 MR. PIGOTT: Well, I can certainly give an
9 initial response and would probably want to look at it for
10 a supplement.

11 JUDGE KELLEY: Okay. Sure.

12 MR. PIGOTT: With respect to he prepared
13 direct testimony -- and I think that's the only one over
14 which the company has control going into a proceeding like
15 this -- carries the full assent and acquiescence of the
16 corporation such that they consider it to be the official
17 corporate word and what it says it will do. With respect
18 to the finer questions as to whether or not certain enforce-
19 ment procedures may lie against the company, I'm just not
20 in a position really to talk about that with respect to the
21 overall. I would say that the company is thoroughly com-
22 mitted not simply to complying with the regulations, but to
23 having an excellent emergency planning and response capability.

24 So I would say that anything you see in the
25 direct testimony certainly by way of a commitment is in fact

6
1 the corporate word. To the extent that anybody would want
2 to test a violation with some kind of procedure in the future,
3 I don't think I'm in a position as I sit here right now to
4 stipulate it. But it is certainly intended to tell this
5 Board what we in our best efforts will attempt to attain.

6 JUDGE KELLEY: I appreciate that much. It seems
7 to me it could have, not today or tomorrow but further down
8 the road, an aspect, a practical aspect from the Board's
9 standpoint.

10 MR. PIGOTT: I think so, too. And, for instance,
11 in the same way that you may want -- and I'm sure you do
12 want -- the kind of assurance that says under the regulations
13 that certain things will happen and you are obviously entitled
14 to have that. On the other hand, we have some 400 pages of
15 individual statements which I would not want raised to the
16 level of licensing conditions. So there we are between the
17 two things. I think that's a reasonable position. We're
18 standing behind everything in there, but on the other hand,
19 I would not willy-nilly want to stipulate that everything
20 in our direct testimony should be considered for enforcement
21 purposes as a licensing condition because as, for instance,
22 the last thing that Mr. Cramer was questioned on, the bill
23 inserts, and a number of other things that are still in the
24 formative stages, perhaps as a result of rush or inartful
25 wording some period of time from now could be construed to

7
1 be something far more definitive than they really are and
2 conditions change such that something is not able to be
3 accomplished in precisely that way and then there's a ques-
4 tion as to whether the alternate way is satisfactory.

5 So, you know, I have no hesitancy in saying that
6 everything in there is what we are intending to do and that
7 there is no attempt being made to weasel on any of these
8 things, to use that word again. But on the other hand,
9 to take the additional legal step and raise it to the
10 level of a licensing condition, I don't think that would be
11 prudent from where I sit either.

12 JUDGE KELLEY: I understand your viewpoint.

13 MR. PIGOTT: Now if there are specific items,
14 obviously as the course of -- as we go through the course
15 of this proceeding -- on which you would like a particular
16 commitment, we would be more than happy to address that.
17 As we go, for instance, through Mr. Cramer's, if there's a
18 half a dozen or more things that you would like to see us
19 specifically commit to, we would be happy to entertain that
20 kind of a specific defined undertaking. But simply to go
21 on all of the testimony on that kind of a commitment is
22 something that I really don't think would be prudent for us
23 to do.

24 JUDGE KELLEY: Okay. I think it is something I
25 would rather at this point flag than try to resolve, because

1 we are not at the point of resolving it. It seems to me
2 that we are a good bit further down the road, indeed, at
3 the point of deciding the case. Assuming that, rulings
4 are favorable to you in other respects but we're debating
5 whether or not to make something or other a condition, then
6 it would make a difference legally whether it is necessary
7 to do that at all.

8 MR. HOEFLING: Mr. Chairman?

9 JUDGE KELLEY: Yes.

10 MR. HOEFLING: Can I comment?

11 JUDGE KELLEY: Please do.

12 MR. HOEFLING: The Staff would see a distinction
13 between a commitment and a condition. I would view commit-
14 ments as statements made by the Applicant in its application,
15 in the FSAR and statements made by the Applicant here in
16 testimony. The Staff would not view those types of state-
17 ments as being subject to enforcement action. They may be
18 -- they may form the basis for the issuance of an order of
19 some form, but would not form the basis for any civil
20 penalties.

21 JUDGE KELLEY: What kind of order?

22 MR. HOEFLING: An order from the Director of
23 Nuclear Reactor Regulation or the Director of the Office of
24 Inspection and Enforcement, depending on the nature of the
25 failure of the applicant to meet a commitment. I'm speaking

9

1 now from the perspective --

2 JUDGE KELLEY: Isn't that an enforcement action?

3 MR. HOEFLING: Yes. I think I'm focusing on the
4 enforcement action that might flow from a license condition.
5 I'm thinking of civil penalties most specifically. Civil
6 penalties would be appropriate for violation of a license
7 condition but not for failure to meet a commitment.

8 JUDGE KELLEY: And you'd make a legal distinction
9 between the two?

10 MR. HOEFLING: Yes.

11 JUDGE KELLEY: Well, at some -- I won't set any
12 particular date today, but maybe what I have to do is sit
13 down and write out the questions specifically. But I do
14 have some problems here. This is a very, very sticky area
15 and it is even stickier after that last Court of Appeals
16 decision, in my view, with regard to the significance of
17 these commitments and just what they mean. And we are
18 talking about a case where it is an unfolding area, a new
19 area, so that the Applicants understandably have not finished
20 doing all the things they intend to do. So it becomes
21 important to know what is the nature of the commitments that
22 are being made about things that aren't done yet.

23 So I raise this question. Let's leave it for
24 now that I've flagged it. I'll see if I can't be a little
25 more precise in terms of asking you for some paper.

10

1 MR. MC CLUNG: Mr. Chairman, I won't make a
2 comment because you do want to shut if off here, but I just
3 wanted to point out that that problem was the subject of
4 one of my stream of consciousness motions this morning and
5 that was one of my concerns I was trying to raise this
6 morning. And I would be happy if you did articulate an
7 issue for us to brief or something later on.

8 ///

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

20 k1

1 JUDGE KELLEY: Fine, and I guess I didn't get
2 to you yet because Mr. Hoefling had spoken up, but obviously
3 it is a legal issue that if we are going to look at, we want
4 to hear from all counsel.

5 Scmewhat related to that concern and speaking to
6 the handbook that is now in graph form, you indicated that
7 that would probably be done in the next couple of months?

8 WITNESS CRAMER: That is correct.

9 JUDGE KELLEY: Okay. I don't think we are in
10 a position really to decide now, not having seen it, and
11 not having seen the overall case, just how important that is.
12 I would think, though, that we would want it for the record.

13 Mr. Pigott, were you intending to supply it for
14 the record when it is done?

15 MR. PIGOTT: I was hoping that the record would
16 be closed by the time it is done. Frankly, we would be --
17 I would be -- and I think that probably will be the case, so
18 I would be willing to be supply whatever the current draft
19 is, if that is of some value.

20 JUDGE KELLEY: Why don't you supply the current --

21 MR. PIGOTT: This is --

22 JUDGE KELLEY: -- draft now, and then we will
23 see if we need anything beyond that?

24 MR. PIGOTT: Okay.

25 JUDGE KELLEY: Again, this goes to this question

k2
1 of -- I understand why you haven't finished all the work,
2 and you haven't written the handbook, but on the other hand,
3 we have to decide now whether you have got an adequate over-
4 all plan to deal with emergencies, so we will do the best
5 we can and we will take the draft for the moment.

6 Similarly, the -- this SOP discussed on pages
7 26 and 27, I believe you said for the PIOs, Mr. Cramer?

8 WITNESS CRAMER: Yes.

9 JUDGE KELLEY: So it was a draft of that, I be-
10 lieve, and the PIOs critiqued it and it is now being rewrit-
11 ten, is that correct?

12 WITNESS CRAMER: That is correct. Last Thursday,
13 the 20th, a draft was reviewed in great depth, and it is
14 now being retyped, I guess, as a more accurate way.

15 JUDGE KELLEY: When did you say that that would
16 likely be ready?

17 WITNESS CRAMER: Before coming to these hearings
18 I would have said that it was likely to be reviewed and
19 approved on September the 14th, which is the next tentative-
20 ly scheduled date for the PIOs to meet. I understand this
21 is also the date that most of the response agencies have
22 been requested to come in, and obviously they will be in-
23 volved in that.

24 JUDGE KELLEY: I am sorry. Response agencies
25 are coming --

1 MR. PIGOTT: The local witnesses.

2 JUDGE KELLEY: Oh.

3 WITNESS CRAMER: Local witnesses.

4 JUDGE KELLEY: Subpoenaed witnesses?

5 WITNESS CRAMER: The same date. So --

6 JUDGE KELLEY: Well --

7 WITNESS CRAMER: -- obviously --

8 JUDGE KELLEY: Can you, Mr. Pigott, supply us,
9 assuming it is done around the 14th, can you supply the
10 copy and serve the parties?

11 MR. PIGOTT: Let us -- yeah. Let -- if I can
12 check to see what the status is of the rewrite and the Board
13 understands that these will be submitted as drafts showing
14 the ongoing work, I will supply whatever the cleaned up
15 version is that is available now.

16 JUDGE KELLEY: My only thought was if we are
17 pretty close to the final one, I would wait for that, but
18 do you think this most recent draft is likely to get chopped
19 up a lot, or is this going to be pretty close to what you --

20 WITNESS CRAMER: I would characterize last
21 Thursday as the chopping session.

22 JUDGE KELLEY: Right.

23 WITNESS CRAMER: But you do recognize that this
24 is a creation of the PIOs and not necessarily the total
25 possession of the utility Applicants?

1 JUDGE KELLEY: I think we could look at it in
2 that light, but perhaps then if this last chop is available
3 now, subject to just typing and copying it, we would like to
4 see that.

5 MR. PIGOTT: That is the one I was think of --

6 JUDGE KELLEY: Fine.

7 MR. PIGOTT: -- looking for.

8 JUDGE KELLEY: Now, that is all -- let me check
9 again. That is all the Board has. Perhaps before the re-
10 direct questions, I might hear your motion to strike, and
11 perhaps it has some bearing on redirect.

12 MR. MC CLUNG: Yes, it is very brief. I am
13 going to make a motion to strike one word of testimony, and
14 that is page 42, line 13. It is a response to a question
15 whether or not -- I will read it into the record.

16 Question: In your professional opinion, is
17 there reasonable assurance that, a) information will be
18 made available to the public on a periodic basis on how
19 they will be notified and what their initial actions should
20 be in an emergency, b) principle points of contact with the
21 news media for dissemination of information during an emer-
22 gency, and c) procedures for coordinated dissemination of
23 information to the public are being developed such that
24 the requirements of 10 CFR section 50.47 B7 have been met.

25 And the grounds for my motion are that the

1 witness has not shown himself in the written testimony and
2 in cross examination to be qualified in the issue -- in --
3 with respect to public relations and with respect to human
4 factors such that he could qualify to make an expert state-
5 ment of whether the informational program that has been
6 devised would be effected and meet the regulation that is
7 set forth in the question.

8 An additional ground is that the cross-examina-
9 tion, I think, has disclosed that the Witness lacks personal
10 knowledge and personal contact with the local response or-
11 ganizations in the formulation of these plans, and so there-
12 fore cannot make an opinion on the adequacy of the plans
13 which have to be implemented and created continuously by
14 the local response organizations.

15 JUDGE KELLEY: Is that it? Mr. Pigott?

16 MR. PIGOTT: I would, of course, oppose the
17 motion. The question asks a series of three factual ques-
18 tions as to whether or not the Witness believes that the --
19 in effect that the regulations will be or are being satis-
20 fied. There is nothing in those regulations requiring that
21 the person demonstrate a background in public relations or
22 human factors, and I certainly would think that Mr. Cramer
23 has demonstrated that he is familiar with what is a very
24 wide-ranging program covering a large geographic area, a
25 number of various jurisdictions, a number of disciplines,

6
1 all of which have to be interrelated. There is no one
2 person or one discipline that would immediately qualify to
3 go into all the areas that are required here. However, I
4 think Mr. Cramer has demonstrated that he has been involved
5 since the inception of these programs, has worked closely
6 with their being carried out, and is knowledgeable of their
7 current status and is knowledgeable of the regulatory stan-
8 dards against which they are to be guaged.

9 The Board obviously is not going to be bound
10 by his answer yes. They are going to weigh the question
11 and come to their own conclusion. However, I do not believe
12 that the motion to strike properly lies.

13
14
15
16
17
18
19
20
21
22
23
24
25

ghp 1
Tape 21

1 MR. HOEFLING: Mr. Chairman, the Staff would oppose
2 the motion. Mr. Cramer is offering his opinion here. How good
3 that opinion is can be judged from his testimony and from the
4 responses that he has given on cross examination and the question
5 is really one of weight and not one of admissibility in the
6 Staff's view and the testimony should be admitted with the
7 question of weight being one for the counsel to argue and the
8 Board to judge.

9 JUDGE KELLEY: The Board will deny the motion to
10 strike. It does seem that the points that you have made,
11 Mr. McClung, certainly go to the weight and credibility, but
12 the witness, I think, has demonstrated that he is in a position
13 to offer an opinion on the rather broad issues being put for-
14 ward here.

15 Insofar as there are gaps in his background with
16 respect to aspects of these points, they can be taken into ac-
17 count on the question of weight.

18 Mr. Pigott, do you have, or do you consider that
19 you will have redirect?

20 MR. PIGOTT: We have no redirect of Mr. Cramer.

21 JUDGE KELLEY: Mr. Cramer, thank you very much.
22 You are excused.

23 (Witness leaves stand.)

24 MR. PIGOTT: We would call as our next witness
25 Mr. Barr. Mr. Barr will be represented by Mr. Casey.

1 Whereupon,

2 KENNETH P. BARR

3 was called as a witness herein, and having been first duly
4 sworn, was examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MR. CASEY:

7 Q Mr. Barr, could you please state your full name
8 for the record and your business address?

9 A My name is Kenneth Paul Barr. My address is
10 San Onofre Nuclear Generating Station, south of San Clemente.

11 Q Mr. Barr, have you previously prepared your direct
12 testimony in a document consisting of 18 pages entitled,
13 Applicant's Direct Testimony of Mr. Kenneth P. Barr?

14 A I have.

15 Q Have you brought that testimony with you today?

16 A Yes, I have.

17 Q Have you reviewed that testimony since it was
18 served on the parties in this proceeding?

19 A Yes, I have.

20 Q Do you have any additions or revisions to make to
21 that testimony?

22 A I do. On page 4, line 10, between the words SCE
23 and in, the word personnel should be inserted. On line 11, the
24 word personnel at the end of the sentence should be stricken.

25 Lines 10 and 11 should read: Appointing and

ghp 3
1 directing SCE personnel in onsite and offsite radiological --
2 it continues.

3 Q Do you have any other corrections, Mr. Barr?

4 A Yes, I do, on page 15, line 18, at the end of the
5 line, add the word, the.

6 Q Do you have any other corrections to make to the
7 record?

8 A No, I have not.

9 Q If you were asked the questions in that testimony
10 today as you have corrected it, would you respond with the
11 answers set forth in that testimony?

12 A Yes, I would.

13 MR. CASEY: Your Honor, I would move the admission
14 of the document entitled, Applicant's Direct Testimony of
15 Mr. Kenneth P. Barr.

16 JUDGE KELLEY: So ordered.

17 BY MR. CASEY:

18 Q Mr. Barr, have you prepared a general overview or
19 a summary of your testimony that you would like to offer today?

20 A Yes, I have.

21 The purpose of my testimony is to describe the on-
22 site capability of assessing the radiological significance of
23 any accidental offsite release of radioactivity from SONGS 2
24 and 3 and formulating recommended protective action for the
25 effected populations.

hp 4

1 My testimony demonstrates that without additional
2 assistance available from federal, state and local emergency
3 response organizations, SCE's onsite methods, staffing, systems
4 and equipment for projecting, assessing and monitoring actual
5 or potential offsite consequences of a radiological emergency
6 condition within the plume EPZ for SONGS 2 and 3 provide
7 reasonable assurance that adequate offsite radiation monitoring
8 and dose assessment capability is available to protect public
9 health and safety.

10 My testimony also describes a meteorological tower
11 which is located onsite immediately north of SONGS 1. The tower
12 has instrumentation which records and displays temperature,
13 lapse rate, wind speed, wind direction, wind directional
14 variability in the control room and in the technical support
15 center.

16 In addition I describe the area radiation monitoring
17 system which provides initial and continuing assessment of
18 in-plant radiation levels.

19 ARMS includes wide-range containment radiation
20 monitors which are placed at strategic locations on site. In
21 addition, wide-range effluent monitors capable of indicating
22 high ranges of radioactivity are installed on the stack and
23 condensor, air ejector in each unit.

24 These monitors provide data to indicate the source
25 term which is used to determine offsite dose in the plume EPZ.

1 If plant radiation instruments are off-scale or
2 fail, all physics personnel would be dispatched to perform
3 measurements of radiation levels at predetermined locations
4 around the plant using portable instrumentation.

5 These results would then be used to estimate release
6 rates in offsite dose projections using methods similar to
7 those for the installed equipment.

8 The primary method for calculating potential or
9 actual offsite consequences of releases of radioactivity to
10 the atmosphere are analytical projections based on read-outs
11 from installed monitoring devices.

12 Communications from these devices are converted to
13 source terms of radioactive material available for release from
14 the containment or other locations based on predetermined con-
15 stants.

16 The effect of the source term is then predicted by
17 applying atmospheric dispersion factors or coefficients based
18 on meteorological data and dose conversion factors which relate
19 airborne radioactivity to direct dose rate and thyroid dose rate (p

20 These projected dose rates are compared to the
21 established protective action guides and recommendations for
22 protective action are then made to the emergency coordinator
23 based upon the results of this comparison.

24 An individual trained to perform such onsite dose
25 calculations will be onsite at all times.

1 In the event the projections or onsite monitoring
2 indicates the potential for release of radioactive material to
3 offsite areas resulting in doses approaching the threshold,
4 or the range of PAG's, offsite radiation monitoring teams will
5 be dispatched from SONGS 2 and 3.

6 Generally speaking, offsite monitoring team per-
7 sonnel take direct radiation readings with appropriate survey
8 instruments. They take air samples for analysis of airborne
9 radioactivity.

10 Significant results are reported immediately using
11 portable radio equipment.

12 Monitoring data from these teams is compared to the
13 results of those projections and the results of these comparisons
14 are then used to upgrade preliminary assessments and formulate
15 any new protective action recommendations.

16 The plume EPZ has been separated into 16 22½-degree
17 pie-shaped sectors with SONGS at the focus point of these sec-
18 tors. Offsite monitoring teams will be dispatched to the down-
19 wind sector based on the known wind direction at the time of
20 the release.

21 In addition, other teams would be dispatched to each
22 of the sectors adjacent to the down-wind sector, resulting in
23 team coverage of approximately 65 degrees.

24 Each team would consist of a highly trained health
25 physics technician and one other person assigned from the

ghp 7
1 SONGS maintenance department. The health physics technician
2 would perform all the required monitoring duties and the com-
3 munication with the technical support system.

4 The maintenance worker would be under the direction
5 of the health physics technician and would assist him in trans-
6 porting equipment, driving the survey vehicle, recording data
7 and providing any other assistance required by the technician.

8 Besides the SCE personnel, Southern California
9 Edison also has an emergency mutual assistance agreement between
10 Southern California Edison, Pacific Gas and Electric, and the
11 Sacramento Utilities District.

12 This agreement provides additional trained personnel
13 and equipment from the participating parties which may be used
14 for offsite radiation monitoring and dose assessment.

15 SCE has a sufficient staff of trained dose assess-
16 ment and radiation monitoring personnel to accomplish adequately
17 all of the necessary offsite radiological dose assessment and
18 protective action recommendation function. This capability is
19 only enhanced by the availability of PG&E and other personnel.

20 As a consequence of these onsite capabilities, the
21 offsite radiation monitoring and dose assessment capability,
22 federal, state and local agencies need not be relied upon.

23 That completes my statement.

24 ///
25

#22-1

1 MR. CASEY: Mr. Chairman, unless the Board has
2 any additional questions they'd like to ask at this time,
3 I would tender Mr. Barr for cross examination.

4 JUDGE KELLEY: Mrs. Gallagher?

5 MS. GALLAGHER: Yes.

6 CROSS EXAMINATION

7 BY MS. GALLAGHER:

8 Q Mr. Barr, would you please tell me what course
9 work you've had in the engineering field, if any?

10 A In college I took extensive courses in the area
11 of physics, electricity and magnetism, mechanics, basic
12 physics. I was primarily a physics major in college up
13 through my senior year.

14 Q Do you consider that you have competence in the
15 field of mechanical engineering?

16 A I am not a mechanical engineer.

17 Q Do you consider that you have competence in the
18 field of nuclear engineering?

19 A I spent most of my early career in the area of
20 reactor analysis and design. This was in the area of core
21 design. In that area, I do have competence.

22 Q Do you consider that you have any expertise in
23 the field of assessment of radiation monitoring equipment?

24 A Yes.

25 Q In what sense, please? Please enlarge upon that.

2
1 A Yes. During the time when I was working at a
2 previous company my action, my responsibilities dealt with
3 radiation monitoring activities, directing technicians in
4 their responsibilities, and also being familiar with the kind
5 of instrumentation that they were required to use.

6 Q Are you qualified to diagnose problems in radia-
7 tion monitoring equipment?

8 A I don't have an expertise in electronics, if
9 that's the purpose of your question.

10 Q I'm just trying to determine to what extent you
11 are qualified to render opinions on the capability of the
12 equipment.

13 A I understand how instrumentation works. I don't
14 get into what a particular resistor does or anything of that
15 nature.

16 Q Okay. I'd like to explore the subject a little
17 bit more about equipment capability. So I would direct you
18 to page 4 at line 3. Okay. Starting at line 1, "This
19 includes providing adequate staffing and equipment, main-
20 taining an adequate personnel dosimetry." In what sense
21 do you mean an adequate dosimetry?

22 A Providing dosimetry equipment which will properly
23 monitor an individual's radiation exposure.

24 Q And how do you determine adequacy of the
25 dosimetry?

3

1 A Generally there is a quality assurance program
2 which exposes, for example, a particular piece of dosimetry
3 equipment to a known dose and then, knowing what that
4 exposure is, reading the equipment and insuring that that
5 particular device meets those standards.

6 Q When we're talking about dosimetry here are we
7 talking about any particular kind of equipment? I mean, is
8 it a special specific kind of instrument? Is it the
9 crystalline kind?

10 A There may be a number of different kinds. Thermo-
11 luminescent dosimetry is one type that is prevalent throughout
12 the industry; film badges; just a simple self-reading pocket
13 dosimeter.

14 Q So when you use that term on page 4, line 3,
15 you were referring to dosimetry generally and not to any
16 specific type?

17 A That's correct.

18 Q Okay.

19 A I might add that in the area of personnel dosi-
20 metry I was the manager of a radiation health group and
21 previously responsible for personnel dosimetry in the
22 Naval reactors program.

23 Q Okay. Also on page 4, at line 23, you note
24 that during emergency conditions you would be responsible
25 for insuring issuance and proper use of radiological protec-

4 1 tive equipment. Would you please enlarge upon that and
2 tell me how you would do that?

3 A The primary protective equipment that I'm
4 speaking of there is some kind of a device that is a breathing
5 protection apparatus. For example, a mask that would fit
6 over one's face where there would be a very high efficient
7 filter that the air inhaled by the individual would be
8 filtered through. That's one particular type. Another
9 kind is similar to self-contained breathing apparatus, some-
10 thing like a scuba diver might use, for example. The same
11 basic kind of face-fitting mask, but with supplied air.

12 Each of those has various kinds of protective
13 factors that can be used to go into atmospheres with high
14 levels of airborne radioactivity, for example, or in the
15 case of self-contained breathing apparatus, into areas that
16 have chemical problems not associated with radioactivity at
17 all.

18 Q And what you're saying is that you do the proper
19 use by showing people how to use them properly, is that it?

20 A Part of my responsibility at SONGS is to insure
21 that we have a respiratory protection program. One of my
22 engineers is responsible for that program. And my respon-
23 sibility here is to insure that a program is effective, that
24 it meets the right standards, that it is providing the kind
25 of protection that we want for our people.

1 Q You've characterized the mask, for example, as
2 having a high efficiency filter. How do you know it's a
3 high efficiency filter other than through the brochure of the
4 manufacturer?

5 A These particular ones aren't tested, but these
6 are also not units that are used in high levels of airborne
7 radioactivity. Basically, they are used as a precautionary
8 situation where you don't normally have radioactivity but
9 you might just as a result of some work effort an individual
10 might -- it would be an advantage to him to have some possible
11 kind of protection. For high levels of airborne radioactivity
12 this would not be prescribed. The highest levels would be
13 for a self-contained breathing apparatus.

14 Q Did I understand you to say that this kind of
15 equipment, the mask, for example, that is not used for high
16 level radiation, is not tested? Is that what you said?

17 A The filter itself is not normally tested, at
18 least by us. I'm not sure if it's tested by the manufacturer.

19 Q So when you say high efficiency filter, it's not
20 based on your own testing or experience?

21 A That's correct.

22 Q Okay.

23 A To test a high efficiency filter requires some
24 extensive amount of equipment. I might also add that when
25 we test people with this kind of a device we do find protec-

1 tion factors in the range of 1000, which are not at all
2 unusual. I don't believe we have found any filters where
3 the filter itself has failed.

4 Q Okay. Directing your attention to page 7, at
5 line 5, you have stated beginning at line 4, "In addition,
6 wide range effluent monitors capable of indicating high
7 ranges of radioactivity are installed on the stack and
8 condenser air ejector of each unit." I'm again probing the
9 use of "capable". In what sense and in who's opinion are
10 they capable of indicating high ranges of radioactivity and
11 by "capable" what do you mean?

12 A Well, this is based on, of course, design specif-
13 ications. This is what the instruments were designed to do.

14 Q So it's more a design basis capability than an
15 actual performance capability?

16 A That's correct.

17 Q At page 7, line 12, "The post-accident sampling
18 system provides the capability to analyze the radioactivity
19 level of the reactor coolant and the containment atmosphere."
20 Again, the word "capability". Are you referring to it in
21 terms of its design intent or its performance according to
22 your testing?

23 A I'm referring to it there in terms of its design
24 and intent. Obviously the system is still under construction.
25 It has not been totally tested. It's intended to do just

1 those functions. It provides a capability to take high
2 level samples, to analyze those high level samples in place,
3 or it provides the capability for diluting samples and
4 taking diluted samples.

5 ///

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 Q That is the design intent.

2 A That is correct.

3 Q But what I am trying to get at is whether you per-
4 sonally have tested its capability in any meaningful sense.

5 A Not yet. That will be part of the testing program
6 for the plant. I might add that this particular system is, like
7 any under, would be under routine checks that my people would
8 monitor or, say, a chemistry group would monitor to make sure
9 that this equipment is operational under a continuing situation.

10 Q Turning to page 8, line 2³, you are talking about
11 installed monitoring devices and you said, these devices are
12 intended to be used for this function and have sufficient sen-
13 sitivity and range to remain functional during emergency con-
14 ditions.

15 Again, I am following the use of the idea of equip-
16 ment capability.

17 A These are the design specifications for the instru-
18 mentation of the plant. Obviously they are still under con-
19 struction.

20 Q So it isn't based on your own knowledge that they
21 actually do have sufficient sensitivity; it is the design spe-
22 cification?

23 A That is correct. Recognize that this instrumenta-
24 tion, prior to use, is tested, first of all, whether or not it
25 will respond to radiation, second of all, whether it is

hp 2
1 calibratable, and thirdly, that through the electronics checks
2 it can be believed to work at its designed operational level.
3 We don't usually take a manufacturer's recommendation without
4 testing his equipment.

5 Q Then turning to page 12, at line 16 you are dis-
6 cussing different kinds of radiation detection and you mention
7 alpha contamination levels. What kind of monitoring equipment
8 is used for the alpha contamination?

9 A It is a portable alpha scintillation counter which
10 is designed for alpha detection.

11 Q Is it a portable ionization chamber?

12 A No, it is a scintillation counter.

13 Q Can you tell me what that does?

14 A What will happen is, a light pulse is -- let me
15 start again. A charged particle interacts with a crystal type
16 arrangement and a light pulse is generated. This light pulse,
17 through a photosensitive surface, generates electrons and these
18 electrons then are multiplied through an electronics device to
19 indicate an electrical current.

20 Q And what type of equipment do you use to detect
21 the beta gamma surface contamination levels?

22 A This would be basically a Geiger-Mueller tube (ph.)

23 Q Would you describe this a little further?

24 A This particular one is a pancake probe which has an
25 electrical potential between an internal electrode and the

1 surface. A charged particle entering the probe area basically
2 discharges -- causes a discharge across the electrodes and
3 basically measures one pulse. This electrical pulse is then
4 fed back through the electronics and indicates on either a
5 digital read-out or on a meter.

6 Q Now these are for your monitoring teams.

7 A That is correct.

8 Q Are these portable equipment?

9 A Yes.

10 Q How are they transported? If you have to go out
11 in the field with them, how are they transported?

12 A They are carried by hand. They are fairly light
13 instruments.

14 Q Are they shielded at all? Do they have any lead
15 shielding?

16 A No, not the ones I am thinking of. The pancake-
17 type detector, it is commonly called an HB210 probe, has some
18 shielding on one surface of the probe.

19 Q Do you use any of the -- you referred to them be-
20 fore -- the thermal luminescent dosimeters --

21 A Yes.

22 Q -- for this purpose?

23 A Oh, I am sorry, I didn't answer your question.

24 Q For this purpose.

25 A For this purpose?

1 Q For the field monitoring.

2 A We have at various locations throughout the geo-
3 graphic area, we do have some thermal luminescent dosimeters
4 posted around various locations.

5 Q Do you use the kind that have the calcium chloride
6 or the lithium chloride?

7 A I am not specifically sure of that. That is part
8 of our environmental monitoring program. I don't happen to be
9 responsible for that.

10 Q I see. How would they be transported?

11 A These are simply small devices which would be picked
12 up by an individual and transported manually. They are very
13 light devices.

14 Q Are you familiar with the problems that can be
15 involved in carrying them if they are not properly shielded, in
16 terms of their readability after they are used?

17 MR. CASEY: Ms. Gallagher, could you be more spe-
18 cific on what you are referring to by problems?

19 BY MS. GALLAGHER:

20 Q I am talking about efficiency, their efficiency for
21 calculating exposure.

22 A Any monitoring device records all of its exposure --
23 all the exposure to radiation that is being incident upon it,
24 it will record. It will record natural background or anything
25 that it sees.

ghp 5
1 Q So that if it were exposed early before you took
2 it out into the field, then when you took it out into the field,
3 would you expect it to have an accurate reading at that time?

4 A Let me clarify this. Our monitoring teams do not
5 use these particular devices as monitoring devices to detect
6 radiation levels while they are offsite monitoring. We have
7 devices which are offsite which are stationed there 365 days
8 of the year..

9 Q Are they read by transduction methods? In other
10 words, what they do is they take them to the site of the con-
11 tamination and then, after they are exposed, they are brought
12 back and the heat that they generate is measured and then there
13 is a calculation of heat to energy that is made based on that?

14 MR. CASEY: Mr. Chairman, there seems to be a con-
15 fusion developing here about the use of TLD's. The witness has
16 testified that they are not a monitoring device used in an
17 emergency response monitoring function and it seems to be im-
18 plied in that question that they are.

19 MS. GALLAGHER: I didn't understand that.

20 BY MS. GALLAGHER:

21 Q Is that what you said?

22 A They are not part of the equipment that a monitoring
23 team takes into the field to make direct measures.

24 Q For emergency purposes?

25 A That is correct.

1 Q I am sorry, I didn't hear you say that.

2 I wonder if you would turn back to page 8, please,
3 of your testimony and starting at line 15, you said, the primary
4 method of calculating potential or actual offsite consequences
5 of releases of radioactivity to the atmosphere are analytical
6 projections based on read-outs from installed monitoring de-
7 vices.

8 I wonder if you would describe the monitoring de-
9 vices that are used, if there are any more that you have not
10 already described.

11 Q The monitoring devices that I am talking about there,
12 for example, are the protectors that are mounted on the outside
13 of containment. These devices are Geiger-Mueller tubes that
14 register a radiation dose rate. This radiation dose rate is
15 then converted to the amount of radioactivity that will be
16 inside containment and available for release, for example.

17 ///

18

19

20

21

22

23

24

25

kl 1 Q Thank you. And at page seven, you refer at
2 line eight to an area radiation monitor. Are these specific
3 types of monitors?

4 A These -- the ones that I had reference to there
5 were again assimilation type of device.

6 Q I wonder if you would describe at page eight,
7 line 12 the past system, and tell me if that involves just
8 equipment, or equipment and procedures?

9 A Page --

10 MR. CASEY: Do you mean page seven?

11 BY MS. GALLAGHER:

12 Q Oh, excuse me. I am sorry. Page seven, line
13 12.

14 A Well, basically the post-accident sampling sys-
15 tem is located in a shielded confined space in the reactor
16 building. There is a console external to that building that
17 can be used, or is used, to open appropriate valves to allow
18 taking a sample of containment air, or reactor coolant. The
19 sample -- one of the means of determining the activity in
20 the sample is through the use of germanium-lithium diode
21 device which allows the identification of specific isotopes
22 through the identification of gamma ray energy. The system
23 also allows the collection of a sample, a diluted sample or
24 a non-diluted sample into a shielded container. The system
25 also allows the manual collection of a sample from these

1 areas.

2 Q Okay. At page 17, would you please describe the
3 HP computer?

4 A The health physics computer is basically --
5 call it an HP 1000 processing system. It is supported by
6 tape drive units, a hard disc system, and that is basically
7 the hardware portion of it. There is a duplicate of that
8 system at SONGS 1. There will be a duplicate at SONGS 2 and
9 3. The information from the meteorological tower would be
10 fed directly into the computer system along with any other
11 ionization chambers which are placed at various locations
12 around the area.

13 The computer system has a -- let's see, capabili-
14 ty of monitoring items such as the ARMS channels, process
15 monitors, effluent monitors, some, as I recall, 30-ish kinds
16 of areas on monitors.

17 Q When you say capability, again, you mean that
18 that is the design --

19 A Yes. That --

20 Q -- goal --

21 A -- computer system -- that computer system is
22 not installed. It is currently being installed, being worked
23 on. In addition to the hardware system there will exist
24 software which will allow the projection of off-site dose
25 rates based on input from, say, effluent monitors, or

1 whatever.

2 Q And page seven, line 25, you talk about if plant
3 radiation instruments are off-scale, or inoperable, your
4 health physics personnel would do, I guess, manual kinds of
5 readings.

6 A Yes.

7 Q Can you please tell me under what conditions
8 you might expect the radiation instruments to go off-scale?

9 A I have no real -- I guess I don't have a good
10 answer for why they might go off-scale. My purpose for
11 putting that in was to identify that -- should something
12 unforeseen occur, there is a back-up method for providing
13 off-site dose projections.

14 Q Thank you. On page eight -- well, starting at
15 the bottom of page seven, you are talking about the health
16 physics personnel outfitted in appropriate protective cloth-
17 ing and breathing apparatus if necessary. What kind of
18 protective clothing? Would you describe the protective
19 clothing?

20 A The protective clothing that I am talking about
21 there is basically anti-contamination clothing.

22 Q How does it look? What --

23 A It is basically a tight-fitting -- almost like
24 a jumpsuit kind of clothing, drawstring at the top, cuffs
25 on the sleeves. It is designed to protect the individual

1 worker from contamination on his body. It also provides
2 an opportunity should it become contaminated, to take that
3 clothing off and not spread contamination to other locations
4 in the plant.

5 Q Would these personnel be wearing badges?

6 A Yes.

7 Q Where are the badges located when they wear them?

8 A They would be on the outside of the garment.

9 Q On the torso area?

10 A They would have to be located at the location
11 where we expected the highest does to be occurred.

12 Q And that would be where?

13 A It would depend on where they would be going.

14 Generally for the most part they are worn on the upper por-
15 tion of the body, but depending on what the condition is,
16 I have also put them on people's heads, their backs, places
17 of that nature.

18 Q Do you ever put them on their feet?

19 A Yes, sure.

20 Q Okay. Turning to page six, you talk about the
21 meteorological tower or the site. Can you give me a general
22 description of the location of the wind tower or the meteoro-
23 logical tower on the site?

24 A It is located north of the Unit 1 site plant by
25 the reservoir, if that means anything to you. It is up on

1 the bluff.

2 Q It is on the bluff?

3 A Above SONGS 1.

4 Q Okay. Would you describe the terrain around
5 San Onofre as hilly, full of canyons, that sort of terrain,
6 or is it a flat, level kind of terrain?

7 A Well, let's see, on the west side it is very
8 flat.

9 Q It is the ocean.

10 A Yes. On the east side there is a flat area
11 where the plant is and there is a -- let's say, maybe a 100
12 foot high cliff up to a level area where Interstate 5 is.

13 Q Yes, but beyond Interstate 5, generally wouldn't
14 you characterize that as pretty rugged terrain?

15 A Well, it is hilly, but I have been in rugged
16 terrain and I wouldn't exactly describe that as rugged ter-
17 rain.

18 Q Aren't there canyons --

19 A Oh, I am sure there are canyons --

20 Q -- in that area? Okay.

21 A Some are relatively high.

22 Q That -- I am trying to get at that it is not
23 a level kind of --

24 A No, it is not level.

25 MR. CASEY: Mr. Chairman, could we let the

1 Witness answer the question completely before the next ques-
2 tion is asked?

3 JUDGE KELLEY: I think you were --

4 MS. GALLAGHER: Sure.

5 JUDGE KELLEY: -- cutting him off. Fine, go
6 ahead.

7 MS. GALLAGHER: Well, when I got the answer
8 I wanted --

9 (Laughter.)

10 JUDGE KELLEY: That is understandable, but any-
11 way, did you finish?

12 MS. GALLAGHER: No.

13 JUDGE KELLEY: But did he finish?

14 WITNESS BARR: I am finished.

15 JUDGE KELLEY: All right. Let me just -- while
16 we are in this moment of levity -- it is about 5:30, and we
17 thought we might quit around now, let me ask you about --
18 and I don't mean to rush you at all. I just wonder about
19 roughly about how much more time do you think you would need?

20 MS. GALLAGHER: I would think I would need again
21 as much time as I have taken.

22 JUDGE KELLEY: Okay, well then maybe this is a
23 good time to just stop for the day and you can resume in
24 the morning.

25 Two or three things that the Board wants to

1 raise before we pack up and go.

2 We spoke yesterday about cross-examination plans
3 and because we hadn't theretofore said that we would require
4 them, we didn't require them yesterday or today. But I
5 think our having expressed our wish for them yesterday, we
6 would like to start getting them, and basically follow along
7 the Intervenors and the Staff to the extent that they have
8 got cross. At this point, would you be prepared, not with
9 this Witness that we are halfway through with already, but
10 say, tomorrow, to provide us with an outline?

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

hp 1
a. 25

1 MR. MC CLUNG: If I could get a pretty good idea
2 from the Applicants what the order is afterwards, that won't
3 be any problem.

4 JUDGE KELLEY: Yes, I wanted to ask that order too.
5 I want to look into that, but is there any question in anybody's
6 mind in terms of what we want in terms of a cross examination
7 plan? Let me make a point with respect to these witnesses so
8 far to Staff.

9 If you have just a couple of clarifying questions,
10 we don't need a plan on that. If you have reviewed the testi-
11 mony and you really don't anticipate that you will have any
12 significant questions in terms of time, then we don't need one,
13 but if you do envision substantial questions, we would like an
14 outline.

15 There isn't any particular form. Obviously you can
16 write out all the questions you are going to ask and file that.
17 That is the easiest thing. It is the most comprehensive thing
18 for us and it is probably the hardest thing for you to do.

19 Alternatively you can put in an outline which would
20 let's say, reference page and line that you are going to focus
21 on and indicate what you are going to ask the witness about,
22 but I think having done the kind of preparation that I am sure
23 you are doing, the additional task of writing up an outline is
24 not very burdensome.

25 Okay, now we have your letter of August 19th and you

1 had some asterisks by some witnesses and maybe you can comment
2 on that and let us know what is coming up.

3 MR. PIGOTT: Certainly. The asterisks in the letter
4 of August 19th revolved around the availability of Dr. Linnemann.
5 We understand Dr. Linnemann will be available as of tomorrow
6 sometime, so we will be in a position to go back to the letter
7 of the 19th.

8 As a result of the fact that we have covered two
9 witnesses in an afternoon yesterday, we did become somewhat
10 concerned about witness availability and had contacted Inter-
11 venor attorneys with respect to modifying the order of witnesses
12 and I gave them an order at that time which they agreed to,
13 of Mr. Cramer who was on all day today, Mr. Barr, and then
14 moving on to Mr. Brothers and Mr. Murri.

15 In fact -- and I leave this in large part to their
16 convenience and the Board's convenience because we now have
17 just about anybody here to be put on at any time, I would like
18 to, I think, finish up Mr. Barr and then go back to the order
19 set forth in the letter of the 19th, if that does not cause
20 a problem, which means it would be Mr. Barr, then Dr. Linnemann
21 and Dr. Hauck, Mr. Rey, Mr. Murri, Mr. Brothers, Mr. Woodard
22 and Mr. Kilmer.

23 However, that is extremely flexible and if either
24 the Board or the Intervenors feel that they are in any way in-
25 convenienced we can practically bring people up according to

1 their desires.

2 JUDGE KELLEY: Comments from the Intervenors?

3 MS. GALLAGHER: That is okay with me.

4 MR. PIGOTT: Returning as close as possible to the
5 August 19th letter?

6 JUDGE KELLEY: We will go back to the original
7 listing.

8 MR. PIGOTT: Very good. In that case, we will be
9 calling, after Mr. Barr, Dr. Linnemann, who I believe will be
10 here, Dr. Hauck, Mr. Rey, Mr. Murri, Mr. Brothers, etc.

11 JUDGE KELLEY: One other question that has just
12 occurred to us that we would like to put to the Staff,
13 Mr. Hoefling. The question has to do with the Staff's assess-
14 ment of the FEMA review and I believe we talked about this back
15 in June and you indicated, I think, then, that what you con-
16 templated at the appropriate time was a supplement to the SER
17 which would form this assessment.

18 Would you comment on where you are with regard to
19 that?

20 MR. HOEFLING: Yes, Mr. Chairman. We have concluded
21 the review of the onsite portion of the Applicant's capabilities
22 and that is being put in the form of an SER supplement.

23 With respect to the assessment of the FEMA review --

24 JUDGE KELLEY: Why don't we just take it a step at
25 a time. When do you anticipate that that will be available,

hp 4
1 that SER?

2 MR. HOEFLING: I am shooting now to have that
3 document available for the next two-week session, or out on the
4 street before the next two-week session which we planned, which
5 I think it is September 14th we had originally planned to resume.

6 JUDGE KELLEY: Is this going to be five pages or 50?

7 MR. HOEFLING: The SER supplement may be addressing
8 other issues in addition to emergency planning.

9 JUDGE KELLEY: Okay, just on emergency planning.

10 MR. HOEFLING: On emergency planning the document
11 is in the range of 10 pages.

12 JUDGE KELLEY: And you will also be presenting
13 witnesses to speak to that in your case?

14 MR. HOEFLING: We had contemplated presenting
15 Mr. Sears to speak to the contentions and I am a little confused
16 by the question because the SER supplement may be dealing with
17 issues that really aren't in contention in the case.

18 In terms of the case that the Staff had intended to
19 put on, we had intended to put on Mr. Sears to speak to the
20 issues and of course the SER supplement has to go into the re-
21 cord and I would offer the project manager to sponsor that
22 document in.

23 JUDGE KELLEY: I didn't mean that, but insofar as
24 the SER supplement is relevant to the issues in the case, I
25 assume you have witnesses who could speak to the material.

ghp 5

1 MR. HOEFLING: The only problem I see -- and this
2 is strictly a problem of timing -- if there is a need to have
3 Mr. Sears present his testimony before that document has been
4 completed and put out on the street, and that would present
5 the need to have him come back and sponsor in that document
6 to the extent that it provides additional material -- or we may
7 be able to reach a stipulation on that point with the parties,
8 I don't know how that will go --

9 JUDGE KELLEY: For now, okay. Now you were going
10 to pass on to the evaluation of the FEMA review.

11 MR. HOEFLING: Right. The Staff has not assessed
12 the June 3rd determinations that were made by FEMA. The ap-
13 proach being taken was that FEMA and the Applicant had worked
14 out a program for upgrading the Applicant's capability with
15 respect to the offsite emergency preparedness and the Staff
16 didn't deem a review or an examination of the FEMA findings
17 of June 3 to be a really very profitable endeavor, given that
18 this upgrading was going to be taking place in the near future.

19 So there is no Staff assessment of the interim
20 findings of June 3 that were put on the street by FEMA and none
21 is contemplated.

22 JUDGE KELLEY: Is there any Staff assessment con-
23 templated with regard to what has been done since June 3rd?

24 MR. HOEFLING: That is a question that I don't have
25 an answer to at this point. I think as a matter of application

1 of the regulations, I don't believe such an assessment is neces-
2 sary. Whether, in fact, the Staff is going to assess the
3 status, if you will, of offsite emergency preparedness, I can't
4 answer that question at this point.

5 ///
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

tp#26-1

1 JUDGE KELLEY: Can you help me out in the
2 regulations with regard to where the Staff assessment is
3 in 50.47?

4 MR. HOEFLING: I don't believe there is any
5 reference to a Staff assessment. There is a reference to
6 an NRC examination of the FEMA findings. Let me see if I
7 can run that down.

8 MR. PIGOTT: There's one at 50.47(a), which is
9 the first one. It includes NRC.

10 MR. HOEFLING: Looking at 50.47(a)(2), the NRC
11 will base its finding on a review of the Federal Emergency
12 Management Agency (FEMA) findings.

13 JUDGE KELLEY: Well, I don't want to prejudice
14 any debate on legal issues. One can I suppose find them
15 there. I'm really seeking information at this point. It
16 was my recollection -- and I may be wrong -- that the Staff
17 said at some point that they would be reviewing the FEMA
18 review, as it were, and that they would be coming up with
19 conclusions about the FEMA review. I would have to dig
20 through the June 18, I think, to find it.

21 MR. HOEFLING: That's correct. I did indicate
22 that. And I think that the review that the Staff performed
23 -- I don't think, I know -- that the review that the Staff
24 performed was it examined the FEMA findings and concluded,
25 based on the subsequent agreement between the Applicant and

2

1 FEMA for this course of remedial action that it just wasn't
2 profitable to look at that assessment and expend the resources
3 on it to examine it because this remedial agreement, if you
4 will, between Applicant and FEMA had been reached and the
5 Applicant was in the process of upgrading its preparedness.

6 JUDGE KELLEY: Okay. I think it's useful --
7 and we don't have to pursue this any further -- but it's
8 useful to surface what the Staff's view is at this point--
9 in terms of what the Board and other parties might think is
10 forthcoming. And so what you're saying is, as I understand
11 it, you don't intend to review the FEMA review, period.
12 Correct?

13 MR. HOEFLING: No. I think if the question is
14 do we intend to review the June 3 determinations, if that's
15 the narrow question then I think the answer is -- well, I
16 don't think I can say that the answer is no. Let me put it
17 this way: I can see two options available. Option 1 is that
18 the Staff will not review the off-site capability, if you
19 will, that forms the record in this proceeding. That is
20 one option. A second option is that the Staff would endeavor
21 to examine the June 3 findings and the materials that have
22 been placed before this Board in this proceeding to reach
23 its judgment with respect to off-site preparedness. Those
24 are the two options that I see.

25 And I don't have an answer as to which one of.

3
1 those options will be selected at this time.

2 JUDGE KELLEY: When do you think that selection
3 will take place?

4 MR. HOEFLING: I don't have an answer to that
5 question either.

6 JUDGE KELLEY: It just seems to me it's just
7 getting to be a little late in the day to decide basically
8 what you are going to submit. We need to know what's coming.
9 In a better organized world it would already be here, but
10 we're looking at things that are still being done, so it
11 seems to me we need to know what the Staff has in mind.

12 MR. HOEFLING: I think that the difficulty is
13 that a re-examination of this area in the formal sense, if
14 you will, by FEMA is not anticipated until the November, 1981,
15 timeframe, per the July 14 memorandum that the Board has
16 before it. And I think it is clear from the memorandum of
17 understanding that FEMA does have a substantial role in
18 making judgments in this area and they will be -- they are
19 present in this proceeding now and will be making witnesses
20 available and could be called upon to make judgments as to
21 the adequacy of off-site planning.

22 JUDGE KELLEY: I haven't read yet the testimony
23 that we received -- was it this morning or yesterday? It
24 was my understanding from our discussions, Mr. Perry, that
25 the filing that was coming in, although witness testimony

4

1 and perhaps not labeled FEMA findings, that they would be
2 the functional equivalent of that and that they would give
3 us FEMA's opinion as of now about the adequacy of the
4 Applicants' plans. Did I misunderstand that?

5 MR. PERRY: Well, I want, again, to be very
6 careful in terms of characterizing them as FEMA findings
7 because in-house at FEMA that is a term of art and it is
8 limited to certain very specific people as to who can make
9 them. I think the testimony will give you a reading and
10 the cross examination as to what has been done in the
11 interim period, what direction the planning activities are
12 taking, and what at least at the regional level our view is
13 of the adequacy issue.

14 JUDGE KELLEY: Well, okay. I haven't read it
15 yet; the Board hasn't read it. So we need to discuss this
16 further in the near future, I guess we can do it. But I
17 don't think there's very much profit in it this evening.

18 Anything else anybody wants to bring up at this
19 point?

20 (No response)

21 JUDGE KELLEY: Nine o'clock tomorrow morning.
22 Thank you.

23 (Thereupon, at 5:47 p.m., the hearing was
24 recessed, to reconvene at 9:00 a.m. Thursday, August 27,
25 1981.)

NUCLEAR REGULATORY COMMISSION

This is to certify that the attached proceedings before the
NUCLEAR REGULATORY COMMISSION

in the matter of: Southern California Edison Company, et al (San Onofre
Nuclear Generating Stations, Units 2 and 3)

Date of Proceeding: August 26, 1981

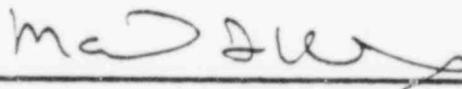
Docket Number: 50-361 OL, 50-362-OL

Place of Proceeding: Anaheim, California

were held as herein appears, and that this is the original transcript
thereof for the file of the Commission.

Martin I. Kersels

Official Reporter (Typed)



Official Reporter (Signature)