RELATED CORRESPONDENCE

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10	Attorneys for Applicants	(E] AUG 20 1981 ► []		
11	Southern California Edison Company and San Diego Gas & Electric Company			
12				
13	UNITED STATES OF AMERICA			
14	NUCLEAR REJULATORY COMMISSION			
15	BEFORE THE ATOMIC SAFETY	AND LICENSING BOARD		
16	In the Matter of)		
) Docket Nos: 50-361 OL 50-362 OL		
17	SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.	j		
18	(San Onofre Nuclear Generating) APPLICANTS' LIST OF WITNESSES) SUBPOENAED TO TESTIFY ON		
19	Station, Units 2 and 3)) EMERGENCY PLANNING CONTENTIONS) AND SUMMARY OF EXPECTED		
20		TESTIMONY		
21				
22	Pursuant to the Order	of the Atomic Safety and		
23	Licensing Board on the record of July 10, 1981 (TR. 3578),			
24	Applicants SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO			
25	GAS & ELECTRIC COMPANY (the "Applicants") hereby submit their			
26	summary of expected testimony for the witnesses subpoenaed			

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1	рy	Applicants to testify on the en	nerg	ency planning contentions
2	adm	itted to this proceeding by Ord	lers	of the Board herein on
3	Jul	y 10, 1981 (TR. 3492-3493) and	Aug	ust 4, 1981 (TR. 6803):
4	Wit	ness/Organization/Address	Gen	eral Area of Expected Testimony
5 6 7	1.	James Hunt Office of Disaster Preparedness 5201 Ruffin Road San Diego, CA	1.	San Diego County emergency planning and preparedness.
8 9	2.	Lt. Col. J.E. Wallace Marine Corps Base Camp Pendleton, CA 92055	2.	U.S. Marine Corps emergency planning preparedness.
10 11 12 13	3.	Jack P. Stowe State of California Department of Parks and Recreation Pendleton Coast Area 3030 Avenida del Presidente San Clemente, CA 92672	3.	State Parks emergency planning and preparedness.
14 15 16	4.	Ronald J. Coleman City of San Clemente 100 Avenida Presidio San Clemente, CA 92672	4.	San Clemente emergency planning and preparedness.
17 18	5.	Cynthia Ferguson City of San Juan Capistrano 32400 Paseo Adelanto San Juan Capistrano, CA 92675	5.	San Juan Capistrano emergency planning and preparedness.
19 20 21	6.	Jill Swanson Capistrano United School Dist. 32972 Calle Perfecto San Juan Capistrano, CA 92675	6.	Capistrano Unified School Dist Procedure for Evacuation and other Protective Measures.
22 23	7.	Barbara Fox General Services Agency 900 N. Broadway Santa Anta, CA 92701	7.	Orange County emergency planning and preparedness.
24 25 26	8.	Don Poorman Communications Division General Services Agency County of Orange 481 The City Dr. Orange, CA 92668	8.	Orange County primary and back-up emergency communication capability.

1	Witness/Organization/Add	General Area of Expected Testimony
2	9. Bert Turner, Manager Emergency Services Di	
3	General Services Ager 625 N. Ross Sc., Rm.	ncy
4	Santa Ana, CA 92701	5-105
5	10. Calvin Nash American Red Cross	 Red Cross reception and care centers for evacuees.
6	Orange County Chapter 601 N. Golden Circle	
7	P.O. Box 11364 Santa Ana, CA 92711	
8	ll. Chief Benjamin	ll. California Highway Patrol
9	Killingsworth California Highway Pa	EPZ evacuation traffic
10	Border Division P.O. Box 20522	management.
11	San Diego, CA 92120	
12	12. David H. Roper Deputy District Direc	tor- 12. CALTRANS EPZ evacuation traffic management.
13	Operations California Department	
14	Transportation (Distr	
15	120 S. Spring Street Los Angeles, CA 9001	.2
16	Each of the abo	ove-listed witnesses has been requested
17	to bring any documents wh	hich they believe are relevant to their
18	general area of testimony	v listed above, including existing or
19	draft standard operating	procedures; personnel, equipment and
20	resource lists; and mutua	al aid agreements. To the extent
21	relevant to issues in cor	tention and their general area of
22	testimony, Applicants ant	cicipate that each of the above-listed
23	witnesses will (1) descri	be the participation of their
24	respective organizations	in the May 13 exercise; (2) respond
25	to the FEMA comments on v	various offsite emergercy plans

26 (April 27, 1981), the FEMA Exercise Evaluation Findings

3

(May 29, 1981) and the FEMA Findings (June 3, 1981), 1 and (3) generally describe their on-going efforts, in 2 3 consultation and cooperation with Applicants and other involved jurisdictions and organizations, to further improve 4 their radiological emergency planning and implementation 5 6 capabilities. 7 Dated: August 17, 1981. 8 DAVID R. PIGOTT EDWARD B. ROGIN 9 SAMUEL B. CASEY JOHN A MENDEZ 10 Of ORRICK, HERRINGTON & SUTCLIFFE A Professional Corporation 11 CHARLES R. KOCHER 12 JAMES A. BEOLETTO SOUTHERN CALIFORNIA EDISON COMPANY 13 14 By 15 Samuel B. Casey One of Counsel for Applicants 16 Southern California Edison Company and San Diego Gas & 17 Electric Company 18 19 20 21 22 23 24 25 26 4

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DECLARATION OF SERVICE BY MAIL

1

2 I certify that: 3 I am employed in the City and County of San Francisco, 4 California, by one of the counsel for Applicants Southern 5 California Edison Company and San Diego Gas & Electric 6 Company herein. 7 I am over the age of eighteen years and not a party 8 to the within-entitled action; my business address is 600 9 Montgomery Street, 10th Floor, San Francisco, California 94111. 10 On August 17, 1981, I served the attached 11 "APPLICANTS' LIST OF WITNESSES SUBPOENAED TO TESTIFY ON EMERGENCY 12 PLANNING CONTENTIONS AND SUMMARY OF EXPECTED TESTIMONY" 13 and the accompanying papers in said cause, by placing a true 14 copy thereof enclosed in the United States mail, first class, 15 or where indicated by an asterisk by Express Mail, at 16 San Francisco, California, addressed as follows: 17 *James L. Kelley, Chairman David W. Gilman Administrative Judge Robert G. Lacy 18 Atomic Safety and Licensing San Diego Gas & Electric Company P.O. Box 1831 19 Board U.S. Nuclear Regulatory San Diego, CA 92112 20 Washington, D.C. 20555 Robert Dietch, Vice President Southern California Edison Dr. Cadet H. Hand, Jr. 21 Administrative Judge Company 2244 Walnut Grove Avenue 22 c/o Bedega Marine Laboratory P.O. Box 800 P.O. Box 247 Rosemead, CA 91770 University of California 23 Bodega Bay, CA 94923 Alan R. Watts, Esq. 24 Rourke & Woodruff Mrs. Elizabeth Johnson California First Bank Building 25 Administrative Judge 10555 North Main Street Oak Ridge National Laboratory Santa Ana, CA 92701 26 P.O. Box X, Building 3500 Oak Ridge, Tennessee 37830

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11	Division of Mines and Geology 1416 Ninth Street, Rm. 1341
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10	Anaheim, CA 92801
18	James Hunt
19	Director, San Diego Office
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	San Diego, CA
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	Jack Stowe, Manager
22	3030 Avenida del Presidente
23	San Clemente, CA 92672
6.0	Cynthia Ferguson
24	Emergency Coordinator
11	City Hall
25	32400 Paseo Adelanto
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Docketing and Service Station Office of Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555

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Calvin Nash, Director Disaster Services 601 N. Golden Circle Drive P.O. Box 11364 Santa Ana, CA 92711

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3	Orange, CA 92668	San Diego, CA 92120
4	Bert Turner, Manager	David H. Roper
5	Emegency Services Division General Services Agency	Deputy District Director - Operations
	625 N. Ross Street, Room B-169	California Department of
6	Santa Anta, CA 92701	Transportation
7		120 S. Spring Street Los Angeles, CA 90012
8		
9	I declare under penal	ty of perjury that the
10	foreging is true and correct and	executed at San Francisco,
11	California on August 17, 1981.	
12		/s/ M. L. BARRON
13		
14		M.L. BARRON
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