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November 16, 1981

Mr. James L. Kelley,  
Chairman,  
Administrative Judge  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Re: In the Matter of Southern California Edison  
Company et al., NRC Docket Nos. 50-361 OL,  
50-362 OL.

Dear Chairman Kelley:

By the Board's Order, dated October 22, 1981, two letters, dated October 15, 1981, from Marshall E. Sanders, Acting Chief, Technological Hazards Division, Office of Natural Hazards, Federal Emergency Management Agency ("FEMA"), to the Chairman of the Board, were included in the record of the above-referenced proceeding. This letter responds to the invitation of the Board to submit written comments on these letters.

THE FIRST LETTER

The first letter responds to a series of related procedural questions which the Board posed on the record of August 27, 1981 to Mr. Spence Perry, FEMA Staff Counsel. (TR. 7703-7706.) On the record of August 28, 1981, Mr. Perry responded to these questions with the qualification that a formal written response would be forthcoming from FEMA's

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National Headquarters ("FEMA National"). (TR. 8016-8021.) Applicants understand that the first letter is FEMA National's formal written response to the Board's procedural questions referred to by Mr. Perry.

Applicants note that the answers set forth by FEMA National in the First Letter confirm the evidence already in the record. Accordingly, Applicants' comments will be directed towards referring the Board to that evidence and advising the Board of the completion of the corrective actions referred to by FEMA National in the First Letter.

1. Comment on Answer to Question #1.

(a) "Question #1: What further steps does FEMA plan to take in evaluating the offsite emergency plans?"

(b) "Answer: FEMA Region IX will continue to monitor the progress of Southern California Edison's efforts in working with the local jurisdictions to correct the deficiencies noted in the June 3, 1981, evaluation of offsite plans and preparedness. Monthly reports will be made by FEMA Region IX to FEMA Headquarters. FEMA Region IX will determine what limited exercises and drills are needed to demonstrate that the deficiencies have been corrected. When the corrective actions outlined in a June 26, 1981, letter from Mr. K. P. Baskins, Southern California Edison to Mr. Brian Grimes of the NRC are completed, FEMA will make an interim finding, under the terms of the November 1980 NRC-FEMA Memorandum of Understanding, concerning the adequacy of offsite emergency plans and preparedness."

(c) Comment: FEMA, Region IX, has been monitoring the progress of Applicants' efforts, in cooperation with the involved jurisdictions, to correct the deficiencies noted in the Interim FEMA Findings through monthly progress reports submitted to Mr. Ronald H. Sandwina, FEMA Region IX, by Southern California Edison Company. The progress reports for the period ending about September 16, 1981 are contained in Applicants' Exhibit 149.

By letter to Mr. Sandwina, dated October 15, 1981, Applicants reported the completion of all the corrective actions proposed by Applicants and agreed upon by FEMA National as necessary to resolve FEMA's concerns set forth in

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the Interim FEMA Findings. The agreement in this regard is reflected in Applicants' Exhibits Nos. 144 and 146. Applicants' letter of October 15, 1981 to Mr. Sandwina is attached for the Board's reference. The enclosures to that letter are not included because these materials only duplicate or add even greater detail to evidence which is already in the record and is thoroughly discussed in "Applicants' Proposed Findings of Fact and Conclusions of Law on Emergency Planning and Preparedness Issues" ("Applicants Proposed Findings") recently served upon the Board and filed herein.

Based on its submittals to FEMA, Region IX, Applicants believe that FEMA is in a position to make a new interim finding and determination under the terms of the November 1980 NRC-FEMA Memorandum of Understanding concerning further improvements in offsite emergency planning and the capability of the involved offsite emergency response organizations to implement this planning.

2. Comment on Answer to Question #2.

(a) "Question #2: Does FEMA consider that it is premature to consider questions of offsite emergency preparedness for San Onofre at this time?

(b) "Answer: FEMA does not believe that it is premature for the Board to consider offsite emergency preparedness. Much planning has been done, a full exercise has been held, and interim FEMA findings have been made and FEMA has continued to monitor and update its views as is reflected in its testimony."

(c) Comment: Applicants concur with FEMA's assessment that it is not premature for the Board to determine whether the state of onsite and offsite emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency, as required by 10 C.F.R. §§ 50.47(a)(1) and (c)(1). As fully detailed in Applicants' Proposed Findings, the substantial and mostly uncontroverted evidence in the record demonstrates that such reasonable assurance exists and that the corrective actions recommended by FEMA have been substantially completed. On-going training and FEMA review in this regard only adds to this assurance.

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3. Response to Answer to Question #3.

(a) "Question #3: What is the status of the Nauman testimony, should it be characterized as a national view or a regional view?

(b) "Answer: Mr. Nauman's testimony represents a FEMA Regional view, except where he reflected his knowledge of Headquarters views provided to him. He represents a Regional view because FEMA Headquarters has delegated to its Regions the responsibility for working with State and local governments in developing their plans and preparedness and in evaluating these efforts. Typically, Headquarters makes findings and determinations on adequacy based on the evaluations by the Region. Mr. Nauman's testimony will become a part of this evaluation process and as such have a bearing on the FEMA findings and determinations on offsite preparedness."

(c) Comment: Applicants concur with this answer. Mr. Nauman's testimony may be independently considered by this Board in resolving the Intervenor's Contentions, evaluating the weight to be accorded the Interim FEMA Findings, and determining the sufficiency and status of the corrective actions that have been taken by Applicants and the involved offsite jurisdictions to remedy the concerns set forth in the Interim FEMA findings.

4. Response to Answer to Question #4.

(a) "Question #4: Is the July 14, 1981, memorandum to Mr. Brian Grimes (subject: emergency preparedness and support of San Onofre Nuclear Generating Station (SONGS), signed by Mr. Jaske) still an accurate reflection of FEMA's proposed actions and timing?

(b) "Answer: Yes, this memorandum is an accurate reflection of the actions to be taken by FEMA. The timing, however, is contingent upon Southern California Edison being able to meet the schedule for correcting the deficiencies detailed in the enclosure to Mr. Baskin's letter of June 26, 1981, to Mr. Brian Grimes."

(c) Comment: Applicants concur with this answer. The memorandum referred to in this answer is Applicants'

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Exhibit No. 146. Applicants have relied upon this memorandum in reporting the completion of the corrective actions deemed necessary by FEMA National to remedy the concerns expressed in the Interim FEMA Findings.

5. Response to Answer to Question #5.

(a) "Question #5: Does the Nauman testimony to the extent that it differs from the June 3, 1981, FEMA findings, supercede those findings?

(b) "Answer: No, the Nauman testimony does not represent new or different findings from those of June 3. The present delegation of authorities to the FEMA Regions do not include the making of findings which is reserved for the FEMA National Headquarters. The Nauman testimony, to the extent that it differs from the June 3, FEMA findings, reflects actions that have been taken by Southern California Edison and local jurisdictions to correct the deficiencies noted in the June 3 findings."

(c) Comment: Applicants concur that Mr. Nauman is not authorized to make interim FEMA findings. However, Mr. Nauman's testimony may be independently considered by the Board in evaluating the weight to be given to the Interim FEMA Findings in light of the information in the record not available to FEMA in making the Interim FEMA Findings, especially the corrective actions accomplished since May 22, 1981, the date upon which the Interim FEMA Findings were made.

6. Response to Answer to Question #6.

(a) "Question #6: Was the target date of November 1, 1981, for the issuance of new FEMA findings, set in the Jaske memorandum of July 14, 1981, the result of external activities by the Southern California Edison Company or internal FEMA considerations?

(b) "Answer: FEMA was given October 15, 1981, by the company as a target for completing the improvement activities to correct the deficiencies. On the assumption that this schedule was met, FEMA added 15 days for processing and forwarding to FEMA Headquarters an evaluation by the Region for the preparation of findings by FEMA Headquarters. Thus, the target date was the result for a combination of



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factors, those outside its control and those within its control.

(c) Comment: On October 15, 1981, Applicants submitted to FEMA, Region IX, its final report documenting completion of the corrective actions deemed necessary by the FEMA National to resolve the concerns expressed in the Interim FEMA Findings. As stated above, this report is enclosed for the Board's reference. Accordingly, Applicants anticipate the issuance of new FEMA findings in the very near future.

THE SECOND LETTER

The second letter sets forth FEMA National's position regarding specific arrangements for medical services for the general public within the Plume EPZ. FEMA National's position relies completely upon NUREG-0654. Compliance with the Evaluation Criteria in NUREG-0654 cited by FEMA National in this regard is fully documented in Applicants' Proposed Findings. (See Applicants' Proposed Findings, 287-320, 424, 437, 441, 457, 458.)

NUREG-0654 expressly incorporates the guidance in NUREG-0396. In this regard NUREG-0654 states that "FEMA has also concluded that the guidance in NUREG-0396 should be used as the planning basis for emergency preparedness around nuclear power facilities." (NUREG-0654, p. 6.) NUREG-0396 expressly rejects the need for specific prearrangements for "special radiological medical provisions for the general public" (emphasis in the original):

"The EPZ guidance does not change the requirements for emergency planning, it only sets bounds on the planning problem. The Task Force does not recommend that massive emergency preparedness programs be established around all nuclear power stations. The following examples are given to further clarify the Task Force guidance on EPZs:

No special local decontamination provisions for the general public (e.g., blankets, changes of clothing, food, special showers)

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No stockpiles of anti-contamination equipment  
for the general public

No construction of specially equipped fallout  
shelters

No special radiological medical provisions  
for the general public

No new construction of special public  
facilities for emergency use

No special stockpiles of emergency animal feed

No special decontamination equipment for  
property and equipment

No participation by the general public in  
test exercises of emergency plans."  
(NUREG-0396, pp. 14-15.)

The rationale for not requiring such pre-arrangements, upon consideration of the full spectrum of accidents including the low-probability high consequence incidents known as Class 9 accidents, was fully explained on the record to the Board by Mr. Grimes and Dr. Linnemann. (Grimes, Tr. 11007-11008, 11059-11061; Linnemann, Tr. 10850-10851.) Mr. Grimes' opinion in this regard is especially significant insofar as Mr. Grimes was the Co-Chairman of the Federal interagency groups that published both NUREG-0654 and NUREG-0396. (See NUREG-0654, p. i; NUREG-0396, p. iii.)

Applicants do not understand FEMA National in the Second Letter to be suggesting anything more than recommended by NUREG-0654. Specifically, FEMA National does not appear to require special arrangements for Class 9 accidents, including special radiological medical provisions for the general public or the construction of special public medical facilities for emergency use. As fully discussed in Applicants' Proposed Findings, the NUREG-0654 requirements concerning medical services for contaminated injured individuals have been satisfied by Applicants and the involved offsite emergency response organizations.

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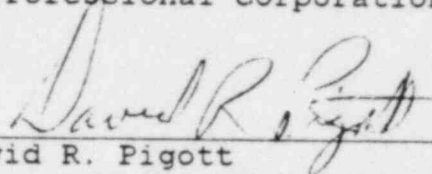
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CONCLUSIONS

Applicants find nothing in either of the FEMA National letters to justify further hearings. If the Board believes that further comments in this regard are warranted, Applicants will be happy to respond to the Board's concerns. Applicants request that this letter and its attachment be incorporated in the record.

Respectively submitted,

David R. Pigott  
Edward B. Rogin  
Samuel B. Casey  
John A. Mendez  
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encl:

cc: Service List  
Spence Perry, Esq.  
FEMA, Office of General Counsel



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*Southern California Edison Company*

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K. P. BASKIN  
MANAGER OF NUCLEAR ENGINEERING,  
SAFETY, AND LICENSING

October 15, 1981

TELEPHONE  
(213) 972-1401

Mr. Ronald H. Sandwina  
Chairman, Regional Assistance Committee  
Federal Emergency Management Agency  
Region IX  
211 Main Street, Room 220  
San Francisco, California 94105

Dear Mr. Sandwina:

SUBJECT: Final Report  
Action Plan to Address FEMA's  
Evaluation Dated June 3, 1981

- REFERENCES:
- (a) SCE (K.P. Baskin) letter to the NRC (Brian Grimes) dated June 26, 1981, subject: Emergency Planning, San Onofre Nuclear Generating Station, Unit No. 1, Docket No. 50-206.
  - (b) FEMA (R.T. Jaske) memorandum to the NRC (Brian Grimes) dated July 14, 1981, subject: Emergency Preparedness and Support of San Onofre Nuclear Generating Station.
  - (c) SCE (K.P. Baskin) letter to you dated July 16, 1981, subject: Progress Report, Action Plan to Address FEMA's Evaluation Dated June 3, 1981.
  - (d) SCE (K.P. Baskin) letter to you dated August 14, 1981, subject: Progress Report, Action Plan to Address FEMA's Evaluation Dated June 3, 1981.
  - (e) SCE (K.P. Baskin) letter to you dated September 15, 1981, subject: Progress Report, Action Plan to Address FEMA's Evaluation Dated June 3, 1981.

(f) Federal Register, Vol. 46,  
page 46587-46588, (September 21, 1981),  
NRC Notice of Proposed Rulemaking.

- ENCLOSURES:
- (1) Standard Operating Procedures of local government with radiological emergency response plans for San Onofre.
  - (2) Listing of radiation monitoring and related equipment in the possession of local government with radiation monitoring responsibilities around San Onofre.
  - (3) Description of upgraded communications capability involving San Onofre Emergency Response Organizations.
  - (4) Description of the Emergency Operations Facility for San Onofre.
  - (5) Description of public alerting (siren) system for persons within the Plume Exposure Pathway EPZ.
  - (6) Description of training programs and training accomplished for personnel having emergency response responsibility for San Onofre.
  - (7) Description of public information programs and completed public information dissemination.

The purpose of this letter is to report the completion of all action which was agreed upon at our meeting on June 15, 1981, as being necessary to resolve the FEMA concerns set forth in the "Interim Findings and Determination Relating to the Status of State and Local Emergency Preparedness for the San Onofre Nuclear Generating Station" dated June 3, 1981. Enclosure (2) of reference (a) provided a summary of the intended action, and reference (b) confirmed that such measures would constitute sufficient corrective action. References (c), (d), and (e) provided reports of progress made towards the accomplishment of the agreed-upon objectives.

October 15, 1981

The enclosures to this letter provide documentation of the actual results achieved. Each enclosure is keyed to the seven numbered action items set forth in the "Summary of Planned Action" (enclosure (2) of reference (a)) as discussed below:

1. Enclosure (1) consists of a copy of all SOP's which have been developed by local government (with SCE support) and are considered to have sufficient breadth and scope to satisfy FEMA's concerns with respect to procedures expressed in items (1), (2), (3), and (4) of enclosure (1) of reference (a). Additional SOP's have also been drafted covering subjects beyond those identified by FEMA, copies of which are also included. These correspond to item 1 (i) given in enclosure (2) of reference (a) for which the schedule was final draft by November 1, 1981, and implementation by December 1, 1981.
2. Enclosure (2) sets forth the lists of equipment relating to radiation monitoring functions which are now in the possession of the appropriate local governmental organizations. This is considered to fully resolve FEMA's concerns regarding equipment weaknesses expressed in item (1) set forth in enclosure (1) of reference (a).
3. Enclosure (3) is a description of enhancements made to the emergency communications systems. This is considered to fully respond to FEMA's recommendation for additional communications equipment expressed in item (5) set forth in enclosure (1) of reference (a).
4. Enclosure (4) describes the arrangements which have been made to improve the EOF operations. The present operational procedures, staffing, and physical arrangements are considered to entirely meet FEMA's recommendations expressed in item (2) set forth in enclosure (1) of reference (a).
5. Enclosure (5) describes the engineering of the public alert (siren) system. This system is completely constructed and will undergo acceptance testing early in November. This system, in conjunction with the notification procedures given in enclosure (1), is considered to fully resolve FEMA's concerns expressed in item (4) of enclosure (1) of reference (a).

October 15, 1981

It should also be noted that reference (f) sets forth the NRC's intentions to revise its regulations to defer until February 1, 1982, its requirements for prompt notification systems.

6. Enclosure (6) sets forth SCE's programs for the training of offsite emergency response personnel. Actual training which has been accomplished as well as future training which has a definite schedule is described. SCE's commitment to provide training is considered to fully respond to FEMA's recommendation given in item (6) set forth in enclosure (1) of reference (a).
7. Enclosure (7) sets forth SCE's public education program and provides samples of public information material which has been distributed to local population groups. The action taken to date in conjunction with SCE's commitment for continuing public education fully resolves FEMA's concerns expressed in item (7) set forth in enclosure (1) of reference (a).

It is believed that the foregoing completes the immediate action previously agreed to which will serve as a basis of revised FEMA findings of overall adequacy. If there are any questions, do not hesitate to contact me.

Very truly yours,



K.P. Baskin

Enclosures

cc: R.H. Engelken, NRC, Region V  
J.J. Kearns, California OES  
IPC Representatives

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

In the Matter of:	)	Docket Nos. 50-361 OL
	)	50-362 OL
SOUTHERN CALIFORNIA EDISON	)	
COMPANY, <u>et al.</u> ,	)	CERTIFICATE OF SERVICE BY
	)	MAIL OF LETTER TO CHAIRMAN
(San Onofre Nuclear Generating	)	OF ATOMIC SAFETY & LICENSING
Station, Units 2 and 3)	)	BOARD FROM APPLICANTS DATED
	)	NOVEMBER 15, 1981 CONCERNING
	)	LETTERS FROM FEMA DATED
	)	OCTOBER 15, 1981

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I certify pursuant to 10 C.F.R. § 2.712(e)(2)  
that:

I am an attorney employed in the City and County  
of San Francisco, California, by one of counsel for  
Applicants Southern California Edison Company and San Diego  
Gas & Electric Company.

I am over the age of eighteen years and not a  
party to the within entitled action; my business address  
is 600 Montgomery Street, 10th Floor, San Francisco, California  
94111.

On November 16, 1981 I served the attached  
"Letter to Chairman of Atomic Safety and Licensing Board  
from Applicants Dated November 16, 1981, Concerning Letters  
from FEMA Dated October 15, 1981", in said cause, by placing  
a true copy thereof enclosed in the United States mail,  
first class, at San Francisco, California addressed as  
follows:

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