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

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

APPLICANTS' REPLY IN OPPOSITION TO INTERVENORS' MOTION TO REOPEN THE RECORD AND FOR FURTHER HEARINGS ON EMERGENCY PLANNING AND PREPAREDNESS ISSUES.

I.

INTRODUCTION

Applicants Southern California Edison Company and San Diego Gas & Electric Company ("Applicants") hereby oppose Intervenors' motion to reopen the record for further hearings

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and to file additional proposed findings of fact and conclusions of law on emergency planning and preparedness issues. Contrary to the Intervenors' unsupported position that such proceedings would be "helpful" (Intervenors' Motion, p. 2), the extremely costly and inconvenient nature of such additional proceedings is neither justified by the updated FEMA findings, nor necessary to protect the public health and safety.

II.

PROCEDURAL BACKGROUND

The Atomic Safety and Licensing Board (the "Board"), by Order dated October 6, 1981 (the "Board Order"), included in the record "the further findings and determinations [of FEMA] concerning the adequacy of the San Onofre emergency plans referred to in Mr. Jaske's memorandum of July 14, 1981 to Mr. Grimes." (Board Order, p. 1; see Applicants' Exhibit #146.) Pursuant to the Board Order, these findings and determination, dated December 1, 1981 ("updated FEMA findings") were provided to the parties under cover of the NRC Staff's motion to supplement the record, dated December 2, 1981.

On or about December 16, 1981, the Intervenors served their "Motion to Reopen the Record and Supplement Findings of Fact in Response to NRC Staff's Motion to Supplement the Record", dated December 16, 1981 ("Intervenors' Motion"). On December 18, 1981, Applicants

received Intervenors' Motion. Pursuant to the schedule established in the Board Order, Applicants hereby file their reply opposing the Intervenors' Motion.

III.

ARGUMENT

Intervenors' Motion is based exclusively on the updated FEMA findings.1/ Applicants' position regarding the significance of the updated FEMA findings is as set forth in "Applicants' Response to the Proposed Findings of Fact and Conclusions of Law on Emergency Planning and Preparedness Issues submitted by Intervenors and the NRC Staff," ("Applicant's Response"), dated and served herein on December 10, 1981. (Applicants' Response, p. 3, note 1.)

It is not the purpose of this reply to reiterate Applicants' position in this regard, or to exhaustively review the substantial evidence in the record, including the updated FEMA Findings, demonstrating that all of the corrective actions recommended by FEMA can and will be taken

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1/ Intervenors' Motion need not even be considered by the Board insofar as it was untimely served more than ten (10) days after Intervenors presumably received a copy of the NRC Staff's Motion to Supplement the Record, dated and served on the Intervenors by Express Mail on December 2, 1981. (Board Order, p. 2.) Intervenors have provided no excuse or other reason for failing to adhere to the deadlines for filing their motion prescribed in the Board Order.

prior to full power operation of SONGS 2.2/ Rather it is the two-fold purpose of this reply to refute Intervenors' position that the Board's consideration of the updated FEMA findings has been somehow limited by the Commission in the Diablo Canyon case; and, second, to demonstrate that the concerns raised by Intervenors do not satisfy established standards for reopening the record and requiring further hearings, nor do these concerns justify Intervenors' request to submit additional proposed findings of fact and conclusions of law based upon the updated FEMA Findings.

A. The Commission has not limited Board consideration of the updated FEMA findings.

Intervenors cite the Commission's decision authorizing low-power operation of Diablo Canyon in support of their position that "without a further review and hearing" the updated FEMA findings "can only be considered so far as they disclose deficiencies in the emergency planning and they cannot be used in any way to demonstrate that the Applicants have complied with the regulations or met its burden of

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2/ For a review of the substantial evidence in the record supporting the determination that there is "reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency" at SONGS 2 and 3, as required by 10 C.F.R. §50.47(a)(1), the Board is referred to Applicants Response, as well as the proposed findings of fact and conclusions of law on emergency planning and preparedness issues filed herein by Applicants and the NRC Staff, dated November 9 and December 3, 1981, respectively.

proof on the contentions." (Intervenors' Motion, pp. 2-3; see Pacific Gas & Electric Company (Diablo Canyon Nuclear Power Plant, Units 1 and 2), CLI-81-21, 2 Nucl. Reg. Rptr. (CCH, Transfer Binder), ¶ 30,630 (September 17, 1981). Far from supporting Intervenors' position, this decision only suggests that under the circumstances Intervenors' motion may properly be denied.

In Diablo Canyon, the Commission took into consideration a FEMA report on an emergency planning exercise conducted after the close of the record on the application for a low power license. In the words of the Commission, such consideration was warranted because (emphasis added):

> "This information bears directly upon the adequacy of emergency planning at Diablo Canyon. It is neither necessary nor reasonable that we be required to ignore it in determining whether issuance of the low-power license is in the public interest. In this case, significant negative information could have alerted the Commission to substantial problems not developed in the record (such as subsequent developments and areas not covered in the hearing). The Commission concluded this information did not raise such issues. The Commission considered the information only to this extent and did not consider whether it strengthened the record." (Pacific Gas & Electric Company, supra, at p. 30,070.)

Likewise, in the present case, the Board is required to consider the updated FEMA findings as a whole, not just selected portions as suggested by Intervenors, to determine whether these findings raise "substantial problems

not developed in the record." Id. In the event, the Board determines such problems are not raised, it may do as the Commission did in the Diablo Canyon case and authorize issuance of the requested license without requiring further hearings.

Applying this approach, Applicants submit that the updated FEMA findings do not raise any substantial problems in emergency planning and preparedness not already fully developed and subject to cross-examination in the record. Nothing in Intervenors' motion suggests how further hearings would improve the record in this regard. Applicants commitment is to implement the corrective actions identified by Applicants (Applicants' Exhibit #144) and agreed upon by FEMA (Applicants' Exhibit #146) prior to full-power operation of SONGS 2. The updated FEMA findings only confirm this commitment. (Updated FEMA findings, at p. 6.) Nothing in the updated FEMA findings indicates or even suggests any reason for believing this commitment will not be fulfilled by all involved parties. In any event, the public health and safety can and will be adequately protected, without further hearings, by the existing obligation of the NRC Staff and FEMA under NRC regulations to continuously monitor the full implementation of the required corrective actions and thereafter assure that an adequate state of emergency preparedness is maintained. See 10 C.F.R., Part 50, Appendix E.IV F. and H.

Under these circumstances, nothing in the Commission's Diablo Canyon decision supports Intervenors' position that the Board is required to blindfold itself to the overall positive nature of the updated FEMA findings which conclude that the corrective actions are well on their way to full implementation and that if the "efforts identified continue to fruition and . . . drills are conducted within the identified time frame, there is reasonable assurance that a capability to provide emergency response will exist within the near future as regards San Onofre Nuclear Generating Station . . . ." (Updated FEMA findings, p. 6; emphasis added.)

B. Intervenors rely upon insufficient reasons for reopening the record for further hearings.

Aside from Intervenors' apparent desire to delay the issuance of a decision in this proceeding on any pretext, it is difficult to ascertain any real purpose for reopening the hearings on emergency planning and preparedness issues. All the Intervenors tell us is that it would be "helpful, subject to cross-examination to demonstrate that the applicants and the offsite jurisdiction actually will do what they have promised to do to test whether those actions are sufficient." (Intervenors' Motion, at p. 2.) This statement is far from sufficient to support the extremely costly and inconvenient burden of additional hearings.

To the contrary, the record in this proceeding, including the updated FEMA findings, amply demonstrates that the Applicants and the offsite jurisdictions are doing what they are obligated or otherwise committed to doing in the interest of public health and safety. The updated FEMA findings serve to indicate that the completion of these actions, while somewhat delayed from prior forecasts by the details of their implementation, will occur prior to full power operation of SONGS 2. Contrary to the conclusion drawn by the Intervenors (Intervenors' Motion, at p. 3), the fact that FEMA's assessment of the schedule for completion (as set forth in the updated FEMA findings) is not quite as optimistic as Applicants' assessment, (as set forth in Applicants' letter to Mr. Sandwina attached to the updated FEMA findings,) only serves as evidence that FEMA is closely monitoring and applying a very high standard to the complete implementation of every detail of the corrective actions being taken by Applicants and the involved offsite jurisdictions. This in itself provides additional assurance that the public health and safety can and will be protected without need for further hearings.

Intervenors' alternative suggestion that the hearings should be reopened "to test whether those actions are sufficient" only reveals that Intervenors are merely attempting at this late date to challenge the sufficency of the corrective actions being taken by Applicants and the

involved offsite jurisdictions. (Intervenors' Motion, p. 2.) Such a challenge is clearly inpermissible insofar as Intervenors failed to avail themselves of the opportunity to challenge the sufficiency of these actions during the hearings. Nothing in the updated FEMA findings provides any excuse for the Intervenors' failure to mount such a challenge at that time. In any event, such a challenge would constitute an entirely new contention in this proceeding. The Board has specifically held that "parties will not be allowed to inject new contentions into the proceeding" based on the updated FEMA findings. (Board Order, p.2.)

Intervenors' Motion also fails to satisfy the threshold showing required by the Board for reopening the record for further hearings. The Board has ordered that any party may move to reopen the record for further hearings for good cause shown.

> "Such a showing shall be based upon particular parts of the FEMA findings and demonstrate that an opportunity for cross-examination (as distinguished, for example, from an opportunity for further comment) is required for a full and true disclosure of the facts." (Board Order, p. 2.)

The Board Order reflects the considerable discretion vested in the Board when determining whether to reopen a record in order to consider new evidence. In exercising this discretion, the Appeal Board requires the consideration of several factors: (1) Is the motion timely?

(2) Does it address significant safety issues? (3) Is the new evidence to be obtained of such a nature that it might affect the outcome of the proceeding? Pacific Gas & Electric Company (Diablo Canyon Nuclear Power Plant, Units 1 and 2), ALAB-598, 11 NRC 876, 879 (1980); Public Service Company of Oklahoma, et al. (Black Fox Station, Units 1 and 2), ALAB-573, 10 NRC 775, 804 (1979); Kansas Gas and Electric Company (Wolf Creek Station, Unit 1), ALAB-462, 7 NRC 320, 338 (1978). In exercising this discretion, the Board is further guided by the Commission's Rules of Practice which provide that only evidence which is relevant, material, and reliable may be admitted in NRC adjudicatory proceedings. 10 C.F.R. §2.743(c). Argumentative, repetitious, cumulative or irrelevant evidence need not be considered and may be stricken from the record. 10 C.F.R. §§2.743(c) and 2.757(b); see 10 C.F.R., Part 2, Appendix A, V.(d)(5) and (7). Applicant's submit an application of these standards to the facts of this case leads to the conclusion that Intervenors' Motion may properly be denied.

First, as discussed above, Intervenors' Motion is not timely. (See footnote 1 supra.) Second, nothing in the Intervenors' Motion reveals a significant safety issue not already thoroughly considered and resolved on the record. (See footnote 2 supra.) Third, Intervenors have failed to specify in what manner additional hearings would result in new evidence affecting the outcome of the proceeding. The

only reason Intervenors have given is a desire to prove that Applicants and the involved offsite jurisdictions "actually will do what they have promised to do." (Intervenors' Motion, p. 2.) Applicants submit this is not a suf .cient reason to reopen the nearings. Intervenors concerns in this regard are adequately protected, without further hearings, by the NRC Staff and FEMA. Finally, the Intervenors' Motion fails to demonstrate that further hearings will not result in the repetitious, cumulative or irrelevant evidence not necessary for a "full and true disclosure of the facts", which the Commission's Rules of Practice have been designed to prevent. 10 C.F R. §§2.743(a) and (c), 2.757(c).

Given the extreme inconvenience, cost, and delay involved in further hearings, it is incumbent upon Intervenors, as the proponent of the motion, to bear the heavy burden of establishing that the foregoing standards and considerations weigh in favor of such drastic procedures. (See 10 C.F.R. § 2.732; Board Order, p. 2.) Applicants submit that Intervenors' Motion fails to satisfy any of the applicable standards and considerations for reopening a record for further hearings and for this reason should be denied.

In a failed attempt to satisfy the foregoing standards, the Intervenors also rely upon what Applicants submit is a complete mischaracterization of the updated FEMA findings concerning standard operating procedures ("SOPs"),

training, drills, and public notification and warning. (Intervenors' Motion, pp. 3-5.)

1. SOPs Are Being Timely Completed.

Contrary to Intervenors' assertion, the "draft" SOPs offered in evidence by Applicants were not offered as evidence that the process of fully implementing the required SOPs was complete, but to show that substantial progress had been made in this regard. (Compare Intervenors' Motion, p. 3 with Pilmer, TR. 11103-11106; Statement of Counsel (Pigott), TR. 11107; see Applicants' Exhibits #152-#156.) The updated FEMA Findings recognize that SOP development "remains to be finished" or is in "its final stages by the jurisdictions," and is expected to be completed "within the next 90 days." (Updated FEMA Findings, Part III.G.1 and 3, IV.A. and I.) However, this recognition may not be used to detract from the substantial evidence in the record that SOP development is well underway and will be completed prior to full power operation of SONGS 2.

In short, the updated FEMA findings regarding SOPs raise no new problems requiring an opportunity for cross-examination and further hearings. Applicants therefore submit that the Board's review of final SOPs under the circumstances is not required in order to make the findings and determinations required under 10 C.F.R. §50.47(a)(1). (See Murri, TR. 7214-7216; Board Colloquy, TR. 11106-11107.)

2. Training Is Being Timely Completed.

Intervenors' reliance on the updated FEMA findings on offsite training in support of their motion is misplaced and once again unexplained and unsupported by the record. (Intervenors' Motion, p. 4 citing Updated FEMA findings, III.G.6 and IV.4.)

The updated FEMA findings confirm the substantial evidence in the record that "training is being conducted and local jurisdiction personnel have attended courses." (Updated FEMA Findings, Part III.G.6.) The fact that FEMA desires further clarification as to the details of this training program (Updated FEMA Findings, Part III.G.6) does not detract from the substantial evidence in the record that the necessary training has been and will continue to be provided to the involved offsite emergency response personnel, as required by NRC regulations. See 10 C.F.R. Part 50, Appendix E.IV.F.

3. Offsite Drills Are Part of the Ongoing Training Program.

Intervenors argue that the fact that FEMA is currently unaware of the conduct of any drills testing the offsite radiation monitoring and assessment SOPs and or any other drills associated with the on-going training program is sufficient cause for reopening the hearings. (Intervenors' Motion, p. 4 citing updated FEMA findings, Parts II.B, III.G.1 and 6, and IV.F.)

Intervenors ignore the fact that the completion of drills involved with SOP development and the offsite training program is not a prerequisite to the licensing of SONGS 2 and 3. In a sense, such drills are never complete, but are on on-going feature required for continued emergency preparedness. The required full-scale exercise required as a condition of licensing has been conducted. See 10 C.F.R., Part 50, Appendix E.IV.F.

There is substantial evidence in the record that the drills referred to by Intervenors will be conducted prior to full power operation of SONGS 2 and are an on-going feature of the involved offsite jurisdiction's efforts to maintain their emergency preparedness. (See footnote 2 infra.) Additional drills and exercises are already required on a periodic basis by NRC regulations. See 10 C.F.R., Part 50, Appendix E.IV.F.

Intervenors have failed to provide any evidence suggesting the need for additional cross-examination concerning the periodic drills and exercises that have been and will continue to be conducted to assure adequate offsite emergency preparedness is maintained.

4. Public Notification and Warning Requirements Will Be Timely Satisfied.

Intervenors assert that Applicants' postponement of acoustical testing of the siren system "can only be interpreted [to mean] that there are currently problems with

the siren system." (Intervenors' Motion, at pp. 4-5 citing updated FEMA findings, Parts III.C. and G.4, and IV.C.) Nothing in the record supports Intervenors' speculations.

The Commission has recently extended until February 1, 1982, the time for establishment of a prompt public notification capability. (Rulemaking Issue (Affirmation), SECY-81-669, December 17, 1981.) In view of the regulatory uncertainty created by the pending revision of the Commission's regulations in this regard, Applicants have believed it prudent to defer acoustical testing of the sirens until the Commission acted on this rulemaking issue to assure that such potentially disruptive testing would not have to be repeated within a very short period due to unanticipated changes in NRC regulations as a consequence of this rulemaking activity.

Applicants have now scheduled an acoustical test of the siren system, in cooperation with the involved local jurisdictions, NRC Staff and FEMA, for the week of January 25, 1982. Any significant deficiences revealed in this test will be remedied within the four-month grace period now provided in the NRC regulations. (Dubois, TR. 6940, 7017-7021; see SECY-81-669, p. 3.)

Intervenors concerns regarding the coverage of the siren system is equally misplaced. (Intervenors' Motion, p. 5.) As Applicants have emphasized in their prior filings, adequate alternative means exist to provide prompt public

notification to the population located within Dana Point and San Juan Capistrano who may not otherwise hear the sirens. (Applicants' Response, pp. 20-21, 40.)

In sum, no reason appears to reopen the record for further hearings on any of the concerns raised in the Intervenors' Motion.

C. Additional or Supplemental Proposed Findings of Fact and Conclusions of Law are not necessitated by the Updated FEMA Findings.

Intervenors also request the Board to further delay these proceedings so that they may file additional findings of fact and conclusions of law "to incorporate" the updated FEMA Findings. (Intervenors' Motion, p. 3.) Applicants 10 C.F.R. §50.47(a)(2).3/ The Board has already indicated it will consider these findings. (Board Order, at p. 2.) As

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3/ For what Applicant's believe to be a quite scholarly discussion of the appropriate consideration to be given to FEMA findings and determination in NRC adjudicatory proceedings, the Board is referred to the Partial Initial Decision, Volume 2, in the TMI (Restart) proceeding, filed December 14, 1981. See Metropolitan Electric Company, (Three Mile Island Nuclear Station Unit 1), (Docket 50-289-SP), at pp. 397-402. In that case, the Atomic Safety and Licensing Board concluded that FEMA findings and determinations should be considered, along with the testimony of the FEMA witnesses. However, given the extensive amount of other evidence in the case the Board concluded that these findings need not be accorded presumptive weight that and it was the Board's "responsibility to make the judgment whether the overall capability of emergency planning is adequate . . . based on the [entire] record." Id. at p. 402. Applicants submit a similar approach to consideration of the FEMA findings and determinations may be applied by the Board in this case.

such, these findings speak for themselves and additional submit the request should be denied as unnecessary to assist the Board in making the findings and determinations required under the applicable NRC regulations. 10 C.F.R. §50.47(a)(1).

The updated FEMA findings are in the record and entitled to the consideration imposed by NRC regulations. findings of fact and conclusions of law need not be proposed by the parties to illuminate their meaning or significance.

The issues addressed in the updated FEMA findings have been fully discussed and resolved in the Applicants' Findings and the NRC Staff's Findings. (See footnote 2 supra.) Intervenors' concerns in this regard have been fully set forth in Intervenors' Motion. Accordingly, Applicants submit that the Board has had the full benefit of all the parties' views on the subject. Additional findings of fact and conclusions of law on the updated FEMA findings will do nothing to improve the Board's understanding of the record or the parties' views on the subjects which remain in controversy. This being the case, the Intervenors' request to file additional proposed findings of fact and conclusions of law may be properly denied.

IV.

CONCLUSION

For the reasons discussed above, Applicants' submit that Intervenors have failed to meet their threshold burden of establishing that the updated FEMA findings raise

significant new problems affecting the public health and safety not already thoroughly reviewed and resolved in the record. Accordingly, Applicants request the Board to deny the Intervenors' motion to reopen the record for further hearings, as well as Intervenors' further request to submit additional proposed findings of fact and conclusions of law in light of the updated FEMA findings.

Dated: December 28, 1981

Respectfully submitted,

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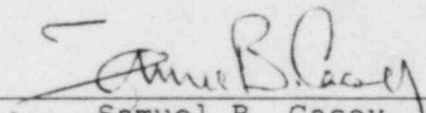
By 
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CERTIFICATE OF SERVICE BY MAIL

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 December 28, 1981, I served the attached "APPLICANTS' REPLY IN OPPOSITION TO INTERVENORS' MOTION TO REOPEN THE RECORD AND FOR FURTHER HEARINGS ON EMERGENCY PLANNING AND PREPAREDNESS ISSUES," in said cause by placing a true copy thereof enclosed in the United States mail, first class (or by Express Mail, where indicated by asterisk), at San Francisco, California, addressed as follows:

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