405 Avenida Granada, Unit 315
San Clemente, California 92672
Telephone: (714) 661-3126

June 21, 1982

WEH

Nuclear Regulatory Commission
United States Government
Washington, DC

RE: N.R.C. DOCKETS NO. ~~50-360 & 50-361~~
SAN ONOFRE NUCLEAR POWER PLANT
UNITS 2 AND 3
SAN ONOFRE, SAN DIEGO COUNTY, CALIFORNIA

Dear Sirs:

This is concerning the present lack of adequate telephone service for the city of San Clemente, California, in the event of a major nuclear power plant emergency at San Onofre. It is requested that you consider this problem with telephone service in accordance with the recent request made to you by the Honorable Edmund G. Brown, Jr., Governor of the State of California, that the N.R.C. fully consider all possible deficiencies in the emergency plans for San Onofre.

As you know, the city of San Clemente is located much closer to San Onofre than any other populated area. San Clemente is a fairly dense population area with minimal evacuation routes because of the mountains on one side of the city and the ocean on the other side. Evacuation may not even be the best alternative in the event of a nuclear emergency. It is inevitable, in any event, that local telephone service will become greatly burdened if such an emergency assumes major and sustained proportions.

San Clemente is served by Pacific Telephone Company. The major portion of the city is located within Pacific's San Clemente Exchange, as is the San Onofre Nuclear Power Plant. The only telephone switching facility for the San Clemente Exchange consists entirely of No. 5 Crossbar switching equipment, which is not state-of-the-art switching equipment. Crossbar switching equipment is electro-mechanical switching equipment which was state-of-the-art in the 1950s and early 1960s. Since 1965 computer-controlled, programmable, electronic switching equipment (ESS) has become the Bell System standard for major new switching installations and modernization replacements.

In the event of an excessive demand being placed upon local telephone service because of a major nuclear power plant emergency, ESS equipment, because it is computer-controlled, can give proper priority to essential requirements for telephone service, and at the same time intelligently ration telephone service to the remainder of the community—without totally denying telephone service to anyone for the duration of the emergency. With crossbar equipment, however, telephone company craftspersons must manually configure the switching equipment to continue to provide essential telephone service in the event of a severe over-demand. When

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the crossbar equipment is so configured, much—if not all—of the residential telephone service in the community must be suspended. This could last for hours in a major emergency, effectively isolating the elderly and disabled who might experience unrelated medical problems during that time.

Additionally, once ESS is in place to serve the entire community, enhanced telephone services can be provided because of the fully-programmable nature of the computer-controlled ESS. For example, if the N.R.C., in conjunction with other safety officials, decided that automatic mass calling of residents by telephone would be appropriate during a major emergency—such would be possible with reasonable hardware and software additions to the ESS equipment. Then, local safety officials could record instructions into the ESS mass-announcement equipment at the time of the emergency and the ESS could then call several hundred telephones at one time, delivering the message. The entire community could be covered in a matter of minutes—depending upon the length of the message—without overloading the ESS equipment.

Pacific Telephone Company has had a policy for several years of converting a certain number of its crossbar switching offices to ESS offices each year. Unfortunately, Pacific does not plan to convert San Clemente to ESS until 1987 or later. This priority should be changed by Pacific so that San Clemente be scheduled for conversion to ESS before Units 2 and 3 at San Onofre are licensed for full-power operation. I urge the N.R.C. to condition final licensing of San Onofre Units 2 and 3 upon Pacific Telephone Company's conversion of its San Clemente switching equipment from crossbar to ESS. Such a conversion by Pacific would be essentially at no additional cost because Pacific has substantial funding already allocated for ESS conversions on a state-wide basis. It would simply require a deferral of conversion at some other less critical location within Pacific Telephone's serving area.

Sincerely,

Wallace B Roberts

Wallace B. Roberts, Member
Citizens' Ad-Hoc Extended Dialing Committee
City of San Clemente

CERTIFIED MAIL NO. P 320 205 971

RETURN RECEIPT REQUESTED

cc: Hon. Edmund Brown, Jr.
John Bryson, Cal. PUC
R. Coleman, Fire Chief,
City of San Clemente
T. Saenger, Pacific Telephone Co.
Office of the President,
Southern Calif. Edison Co.