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January 9, 1984

REG. DIV.

John B. Martin  
Regional Administrator  
United States Nuclear  
Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596-5368

Dear Mr. Martin:

My appreciation for your December 30, 1983 letter regarding a few of the many concerns of the Concerned Cal Poly Faculty and Staff regarding the Emergency Response Plan for a nuclear accident at Diablo Canyon is tendered. I also appreciate your sending our organization a copy of the response of Robert Vickers, Regional Director of FEMA, since he did not see fit to copy us as we had been copying FEMA. We are heartened by your statement that you are interested in concerns of the Concerned Cal Poly Faculty and Staff as they relate to the emergency plan, but must inform you that you are in error when you write (in reference to the FEMA response) that, "I trust that this answers your concerns." In fact, after reading the FEMA response, we are more concerned than ever. For the sake of brevity, we will respond to the first two of the four headings in Mr. Vickers' memo, thus explaining why we believe his response is singularly inadequate. (We could have forcefully replied to the last two headings as well, but believe such overkill is unnecessary.)

(1) EVACUATION TIME CONSIDERATIONS

The FEMA response stresses "standard engineering techniques," a study done at Rancho Seco, and other expert input, but offers no specific replies to our comments, and shows no knowledge of the area surrounding Diablo Canyon. I trust Mr. Vickers has never crept along either Route 1 or Los Osos Valley Road in heavy fog as have many of us, perhaps averaging 10 or 15 miles an hour. As one who lived in Baywood Park from 1971 to 1978, I can attest that heavy fog and flooding do occur along the roads in question, and they are infinitely worse driving conditions than "heavy rain," whatever the "standard engineering techniques" may claim. Further, to cite a Rancho Seco study with its far more extensive road network, as well as its inland as opposed to coastal weather conditions, is irrelevant. For our area, a 20% add-on time from "best case" to "worst case" weather conditions is ludicrous.

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(2) EVACUATION TRANSPORTATION ROUTES

As documented in my December 9, 1983, letter to you, any work on Twin Bridges between Baywood Park and Morro Bay is not slated to begin before 1985-86 at the earliest. Since no construction projects have been carried out on the problem evacuation transportation routes, the flooding potential for the area is the same this Winter as it was last Winter; there is also no reason to believe the dangers will be any less during the next rainy season should Diablo Canyon be in operation by then. To state that, "The County has addressed certain flooding problems and have (sic) budgeted funding for improvements to the impacted areas," is meaningless and a subterfuge unless Mr. Vickers can specifically detail what changes have been made or will be made by the time Diablo Canyon is scheduled to go on-line. We submit that absolutely nothing has changed regarding transportation routes, assurances to the contrary.

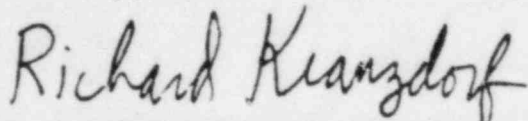
It does not inspire confidence in FEMA to read that, "People can be evacuated east on Los Osos Valley Road, and it is considered unlikely that both Morro Bay and San Luis Obispo would be evacuated concurrently." Who considers it unlikely? Is Mr. Vickers aware that at TMI when it was suggested that only pregnant women and preschool children leave the area, some 149,000 people chose to do so? In fact, during one of the Diablo Canyon drills, wind conditions suddenly changed, and areas not intended to be evacuated suddenly were included in the planning. The fact of the matter is that, as stated in our November 5, 1983, letter, the possible need to evacuate the Baywood Park/Los Osos population along only Los Osos Valley Road into the city of San Luis Obispo points up the paucity of evacuation transportation routes in the Emergency Planning Zone, and has all the makings of a catastrophe.

Table I.5-2 of the County Emergency Response Plan lists 11,554 people living in Baywood Park/Los Osos (Attachment A). Table I.5-3 lists 371 carless households, and 5,441 "evacuation vehicles" for the area (Attachment B). Finally, Table I.5-5 shows that Los Osos Valley Road can handle 1,000 vehicles per hour, if both lanes are moving in the same direction (and if the weather conditions are not too unfavorable) (Attachment C). We would ask "the engineering and transportation experts" to compute how long it would take to move the Baywood Park/Los Osos population from their homes to a relocation center were Los Osos Valley Road the only means of exiting the area. Before we are again accused of engaging in "worst case" scenarios, may we again point out that Los Osos Valley Road was the only means out of Baywood Park/Los Osos several times last Winter! Flooding at Twin Bridges, in fact, shut off the alternate means of evacuation no less than three times in a single week. It was reported by one who lives in San Luis Obispo (but works in Los Osos) that when she drove to work along Los Osos Valley Road last Winter during minor flooding, traffic was backed up the entire nine miles between the two communities,

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We are sorry if this correspondence is far sharper than either of the other two letters which have been sent to you. The sharpness is not directed at your office. It is, rather, the result of reading a smoothly-worded FEMA response, complete with bland assurances intended to deny that serious problems exist. If we are to be accused of "worst case" analysis, may we similarly submit that Mr. Vickers engages in "best case" analysis. Only when Mr. Vickers and others of his persuasion engaged in emergency planning admit there are serious problems with the Diablo Canyon Emergency Response Plan will there be some hope for substantive improvement in the Plan. Until then, we will continue to read about "standard engineering techniques, "appropriate protective measures," and "Should you require further assistance...do not hesitate to contact..."

Sincerely,



Dr. Richard Kranz Dorf, Spokesperson  
Concerned Cal Poly Faculty and Staff  
160 Graves Avenue  
San Luis Obispo, CA 93401

CC: Commissioner Palladino  
Commissioner Bernthal  
Commissioner Gilinsky  
Commissioner Assaltine  
Commissioner Roberts  
Congressman Leon Panetta  
Congressman William Thomas  
Congressman Edward Markey  
Director Ross A. Scarano, Radiological Safety & Safeguards Programs, NRC  
Federal Emergency Management Agency  
Office of Emergency Services (State of California)  
Office of Emergency Services (County of San Luis Obispo)

Attachments: 3

## (ATTACHMENT A)

TABLE I.5-2

PROTECTIVE ACTION ZONE ESTIMATED 1980 POPULATION  
AND DWELLING UNITS  
(Sheet 1 of 2)

<u>Protective Action Zone Number and Title</u>	<u>Residential Population</u>	<u>Dwelling Units</u>
2-mile	5	3
6-mile	58	27
Avila/San Luis Bay	949	502
See Canyon/Prefumo Canyon/ Los Osos Valley	57	29
Baywood/Los Osos	11,554	4,691
City of Pismo Beach	5,286	3,315
Squire Canyon	210	79
San Luis Obispo Area	41,803	15,561
Morro Bay/Cayucos	11,830	6,172
Five Cities, Southern Portion	25,459	10,555
Price Canyon, Orcutt Road Lopez Drive, Route 227	1,386	599
Nipomo North of Willow Road	<u>2,000</u>	<u>744</u>
Subtotal, Basic EPZ	100,588	42,277
Nipomo	7,137	2,474
Cuesta Pass/Santa Margarita	1,151	455
Route 41/Cypress Mountain Dr.	<u>171</u>	<u>66</u>
Total, Basic and Extended EPZ	<u>109,047</u>	<u>45,272</u>

## (ATTACHMENT B)

TABLE I.5-3

1980 ESTIMATED CARLESS POPULATION AND EVACUATION VEHICLES  
(Sheet 1 of 2)

Protective Action Zone Number and Title	Carless Households	Evacuation Vehicles		
		Residential	Transient	Total
2-mile		3	500	503
6-mile	3	31	370	401
Avila/San Luis Bay	39	577	700	1,277
See Canyon/Prefumo Canyon/ Los Osos Valley	2	34	-	34
Baywood/Los Osos	371	5,441	-	5,441
City of Pismo Beach	193	2,538	2,000	4,538
Squire Canyon	7	343	-	343
San Luis Obispo	1,347	17,671	1,000	18,671
Morro Bay/Cayucos	550	5,687	1,355	7,042
Five Cities, Southern Portion	942	12,390	1,475	13,865
Price Canyon, Orcutt Road, Lopez Drive, Route 227	53	587	-	587
Nipomo, North of Willow Road	62	863	150	1,013
Subtotal, Basic EPZ	3,569	46,165	7,550	53,715
Nipomo	214	2,870	375	3,245
Cuesta Pass/Santa Margarita	39	528	-	528
Route 41/Cypress Mountain Dr.	6	77	-	77
Total, Basic and Extended EPZ	<u>3,828</u>	<u>49,640</u>	<u>7,925</u>	<u>57,565</u>



## (ATTACHMENT C)

TABLE I.5-5

## CAPACITY OF MAJOR EVACUATION ROUTES

<u>ROUTE</u>	<u>SEGMENT</u>	<u>NO. TYPE</u> <sup>1</sup>	<u>LANES</u>	<u>CAPACITY</u> <sup>2</sup>
US 101	San Luis Obispo - Atascadero	F	4	3,600 <sup>3</sup>
	San Luis Obispo - Santa Maria	F	4	3,600
State Route 1	San Luis Obispo - Cayucos	F	4	3,600 <sup>4</sup>
	Cayucos-Cambria	R	2	1,500
	Pismo Beach	A	2	1,200
	Pismo Beach - Grover City	A	2	1,500
	Grover City - Nipomo	A	2	1,200
	Nipomo - Guadalupe	R	2	1,500
State Route 41	Morro Bay - Atascadero	R	2	1,200
State Route 166	Nipomo (East)	R	2	1,200
State Route 227	San Luis Obispo - Arroyo Grande	R	2	1,000
Arroyo Grande - Los Berros Road	Arroyo Grande - Nipomo	R	2	1,000
Avila Road	Avila Beach - US 101	R	2	1,000
Cypress Mountain Drive	Cayucos - Route 46	R	2	800
Los Osos Valley Road	Los Osos - San Luis Obispo	R	2	1,000
Orcutt Road	Arroyo Grande - San Luis Obispo	R	2	1,000
South Bay Boulevard	Los Osos - Morro Bay	R	2	1,200

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<sup>1</sup>F = Freeway/Expressway; R = Rural Highway; A = Urban Arterial.

<sup>2</sup>Vehicles per hour (vph), in assumed usage during evacuation (one-way capacity).

<sup>3</sup>Assumes added capacity gained through operation with four lanes up Cuesta Grade for certain periods of evacuation. (See Attachment II.7.5-1).

<sup>4</sup>6,000 vph in city of San Luis Obispo and Morro Bay.