



# Federal Emergency Management Agency

Washington, D.C. 20472

OCT 21 1986

MEMORANDUM FOR: Edward L. Jordan  
Director, Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission

FROM:

*Richard W. Krumm*  
Richard W. Krumm  
Assistant Associate Director  
Office of Natural and Technological Hazards  
Programs

50-206, 362  
361

SUBJECT: Petition to Expand the Emergency Planning Zone  
for San Onofre

This is in response to your memorandum of August 6, 1986, requesting assistance from the Federal Emergency Management Agency (FEMA) in responding to concerns expressed by the Mayor of the City of Laguna Beach, California in a petition filed pursuant to 10 CFR 2.206. The petition specifically requests an expansion of offsite radiological emergency planning for the San Onofre Nuclear Generating Station to include the Cities of Laguna Beach and South Laguna, California.

The State of California Emergency Services Act provides the legal basis for the emergency planning and preparedness programs of counties and cities within the State. The State of California Master Mutual Aid Agreement, which provides for support from adjacent jurisdictions, would be effected during a radiological emergency at the San Onofre Nuclear Generating Station. Orange County would coordinate mutual aid required between jurisdictions within Orange County, including the Cities of Laguna Beach and South Laguna. Therefore, under this arrangement, both communities would be protected in a radiological emergency at San Onofre.

The following planning considerations are quoted directly from the County of Orange Incident Response Plan for San Onofre Nuclear Generating Station and do address the Cities of Laguna Beach and South Laguna:

- "(1) Emergency Planning Zone (EPZ) - is that area of land that extends approximately in a ten-mile radius from the SONGS site. Due to jurisdictional boundaries and topography considerations, this ten-mile planning radius has been expanded to include the City of San Clemente and City of San Juan Capistrano, as well as Dana Point, Capistrano Beach, Doheny Beach State Park, and San Clemente State Park. In the event of an incident at SONGS, this area is considered to be more at risk. Planning, procedures, and protective actions described herein are primarily concerned with this area. See Figure 10.

8610240265 861021  
PDR ADOCK 05000206  
F PDR

1535

- (2) Public Education Zone - is that area outside and adjacent to the Emergency Planning Zone. It encompasses the communities of Laguna Beach, Laguna Hills, Laguna Niguel, South Laguna, El Toro, and Mission Viejo in Orange County. The zone was established to ensure that the public would be informed in advance how it would be notified of an emergency and what protective actions, if any, should be taken. The only protective action which the public in this zone may be asked to take is sheltering. Evacuation is not considered a necessary protective action because the distance from San Onofre reduces any hazard beyond the 10-mile zone so significantly that this precaution becomes unnecessary. See Figure 11."

The State of California and County of Orange radiological emergency response plans were formally submitted to the Federal Emergency Management Agency, Region IX, in November 1985 for review and approval in accordance with 44 CFR 350. Based upon the Region IX RAC review, the plans are currently being updated and will be resubmitted to FEMA for review.

The State of California, and Orange and San Diego Counties, which are located in the plume emergency planning zone, have participated in the five offsite emergency preparedness exercises that have been conducted, with the latest exercise held September 10, 1986. There are currently no deficiencies or areas that require corrective actions in offsite radiological emergency preparedness.

Attached is a letter dated September 22, 1986, from the State of California Governor's Office of Emergency Services to FEMA Region IX. As stated in the letter, "The position taken by the State of California is unchanged; we feel the existing emergency planning zone around San Onofre is adequate and the residents of the City of Laguna Beach are adequately protected."

FEMA considers that offsite radiological emergency preparedness at San Onofre for the current EPZ is adequate to provide reasonable assurance that appropriate measures can be taken offsite to protect the health and safety of the public living in the vicinity of the site in the event of a radiological emergency. FEMA also considers that the level of offsite planning and preparedness provided for the Cities of Laguna Beach and South Laguna in the existing emergency response plans for Orange County and the State of California, is adequate to meet the guidance of NUREG-0654/FEMA-REP-1, Rev. 1. Furthermore, based on the existing mutual aid structure, these plans seem adaptable to supporting response activities beyond the current EPZ boundaries.

If you have any questions, please contact Mr. Robert S. Wilkerson, Chief, Technological Hazards Division, at 646-2860.

Attachments  
As Stated



2  
2  
4

The State of California Emergency Services Act provides the basis for the emergency preparedness programs of counties and cities within the state. Government at all levels is responsible for providing continuity of effective leadership and authority, direction of emergency operations, and management of recovery. The State of California Master Mutual Aid Agreement would be effected during a radiological emergency at the San Onofre Nuclear Generating Station. By that agreement, mutual aid between jurisdiction with the County of Orange will be coordinated by the Operational Area Coordinator, or designee, for Orange County. Those jurisdictions are identified in the County of Orange, Incident Response Plan for San Onofre Nuclear Generating Station, as follows (Page 32, Item g. Offsite Areas of Concern):

- "(1) Emergency Planning Zone (EPZ) - is that area of land that extends approximately in a ten-mile radius from the SONGS site. Due to jurisdictional boundaries and topography considerations, this ten-mile planning radius has been expanded to include the City of San Clemente and City of San Juan Capistrano, as well as Dana Point, Capistrano Beach, Doheny Beach State Park, and San Clemente State Park. In the event of an incident at SONGS, this area is considered to be more at risk. Planning, procedures, and protective actions described herein are primarily concerned with this area. See Figure 10.
- "(2) Public Education Zone - is that area outside and adjacent to the Emergency Planning Zone. It encompasses the communities of Laguna Beach, Laguna Hills, Laguna Niguel, South Laguna, El Toro, and Mission Viejo in Orange County. The zone was established to ensure that the public would be informed in advance how it would be notified of an emergency and what protective actions, if any, should be taken. The only protective action which the public in this zone may be asked to take is sheltering. Evacuation is not considered a necessary protective action because the distance from San Onofre reduces any hazard beyond the 10-mile zone so significantly that this precaution becomes unnecessary. See Figure 1."

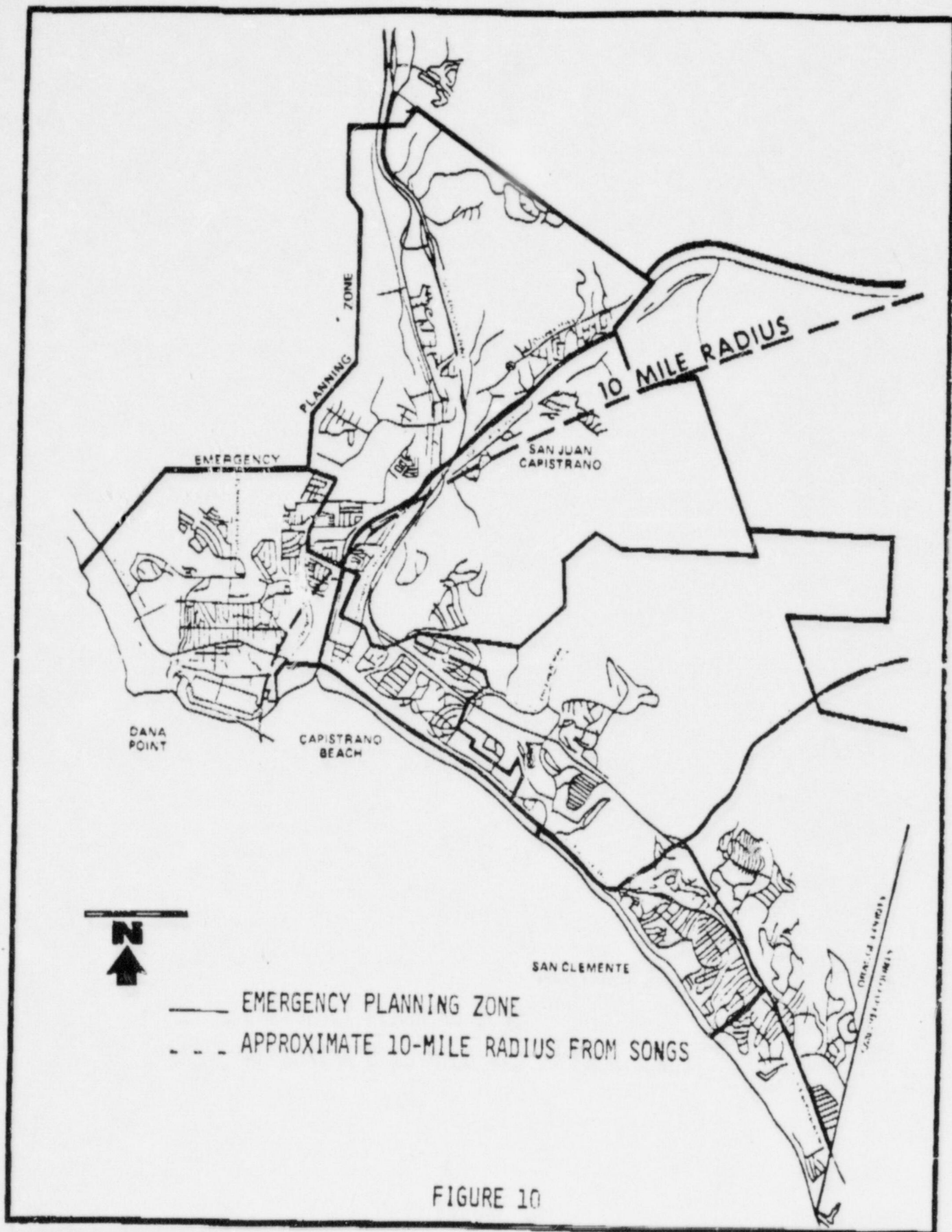
Draft radiological emergency response plans for the State of California and the County of Orange were unofficially reviewed by the Regional Assistance Committee, Region IX. The plans were formally submitted to the Federal Emergency Management Agency, Region IX, during November 1985 for review and approval in accord with 44 CFR 350. Based on exercise findings and unofficial comments of the Regional Assistance Committee, Region IX, to the state and local offsite jurisdictions, the plans are currently being updated and resubmitted to the Federal Emergency Management Agency for consideration in the 44 CFR 350 process. It should be noted that the draft planning documents were exercised during 1981, 1982, 1983, and 1985. Each of the exercises resulted in findings for corrective actions identified as not detracting from the overall capability demonstrated by the State and county to protect the health and safety of the public in the event of a radiological emergency.

A Public Meeting was conducted on May 18, 1981, to provide the public with an opportunity to comment on the plans and exercises activities.

The Alert and Notification (siren) System was completed during 1981 and tested during 1981 and 1982. A formal alert and notification demonstration and public telephone survey was conducted on September 28, 1983 and approved by report dated January 5, 1984. A test and maintenance system is in place that includes annual testing of the sirens. The most recent annual test was conducted on September 11, 1986. All 50 sirens were successfully activated. The siren maintenance program from September 11, 1985 to September 11, 1986 (including bi-233kly silent, quarterly growl, and the annual test) resulted in an annual siren operability of 97.64%.

An informational handbook and an Emergency Brochure have been distributed to residents within the emergency planning zone and the public education zone annually since 1982. A system is in place to provide these materials to each new resident making application for utilities within those zones.

Based on the information above and that provided by the State of California (attached), the Federal Emergency management Agency, Region IX, feel that the adequacy of offsite preparedness for San Onofre with respect to the issue of the size of the current EPZ based on plan reviews and exercise observations performed to date is adequate to reasonably assure that appropriate measures can be taken offsite to protect the health and safety of the public living in the vicinity of the site in the event of a radiological emergency.







Public Education Zone  
Figure 11

*Southern California Edison Company*

P. O. BOX 4198

SAN CLEMENTE, CALIFORNIA 92672

F. C. BUD JACKLEY  
MANAGER, NUCLEAR AFFAIRS  
AND EMERGENCY PLANNING

TELEPHONE  
(714) 368-8310

September 26, 1986

Susan Elkins  
FEMA Region IX  
Building 105, Presidio  
San Francisco, California 94129

Dear Susan:

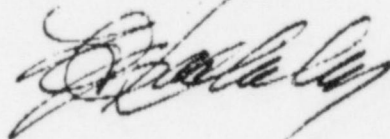
On September 11, 1986 we fulfilled our annual FEMA requirement by conducting a full scale test of our Community Alert and Notification Siren System.

All 50 sirens were successfully activated for both tests. The second activation of the sirens additionally tested the remote control panel at Orange County (for activation of San Juan Capistrano sirens) successfully.

Our annual siren maintenance program, which is from annual siren test September 11, 1985 to September 11, 1986 and includes bi weekly silent, quarterly growl, and the annual test, resulted in an annual siren operability of 97.64%.

Should you have additional questions, please contact me or Jack Wallace.

Sincerely,





GEORGE DEUKMEJIAN  
GOVERNOR

# State of California

## GOVERNOR'S OFFICE OF EMERGENCY SERVICES

2800 MEADOWVIEW ROAD  
SACRAMENTO, CA 95832

	ACT	INFO
ORD		<input checked="" type="checkbox"/>
DRD		
FS		
EA		
PIO		
RMA		
DAP		
EMNPP		<input checked="" type="checkbox"/>
NTH		
G		
ANRC		
REF CT		
DATE:		
LOG:	SEP 23 1986	

September 22, 1986

Mr. Robert L. Vickers  
Regional Director  
Federal Emergency Management Agency  
Region IX  
Building 105  
Presidio of San Francisco, California 94129

Dear Mr. Vickers:

In response to your letter dated August 22, 1986 regarding the request by the City of Laguna Beach to extend the Emergency Planning Zone (EPZ) for the San Onofre Nuclear Generating Station to include the City of Laguna Beach, I have prepared the following response.

The position taken by the State of California is unchanged; we feel the existing emergency planning zone around San Onofre is adequate and the residents of the City of Laguna Beach are adequately protected. Our position is based on the following:

1. Technical studies, completed in 1980, of postulated accidents at San Onofre considered specifics on the San Onofre reactors, site-specific meteorological data, demography, topography, and public health impact.
2. Review and approval by the Governor's Emergency Council of the County of Orange Incident Response Plan for San Onofre Nuclear Generating Station. Although the plan does not specifically address the Laguna Beach area, it is adaptable to include Laguna Beach.
3. The San Onofre exercise findings have always indicated an above-average level of offsite preparedness.
4. All residents of the City of Laguna Beach receive annual brochures detailing evacuation routes and protective actions.



Mr. Vickers  
Page 2  
September 22, 1986

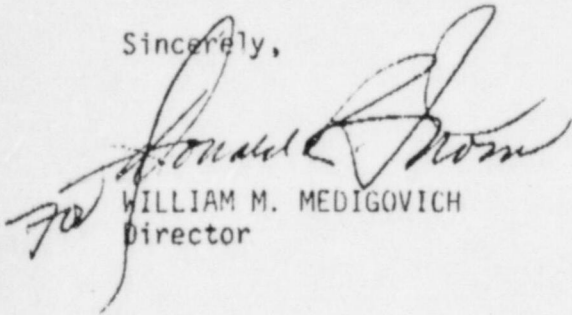
5. The City of Laguna Beach's existing emergency plan addresses:

- Evacuation of residents with warning and without warning.  
During an emergency at San Onofre Nuclear Generating Station, warning would be accomplished by the use of the Emergency Broadcast System with augmentation from fire and law enforcement agencies.
- Coordination with Orange County for emergency support.

Although the residents of the State of California have reason to be concerned about the Chernobyl incident, they must consider the construction differences. Our technical studies, which served as the basis for the Emergency Planning Zones, analyzed United States reactors.

I hope this information is beneficial as you prepare your response to the Nuclear Regulatory Commission.

Sincerely,



WILLIAM M. MEDIGOVICH  
Director