

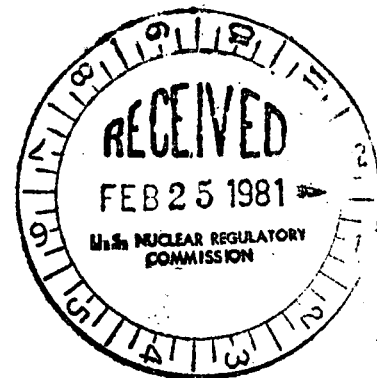
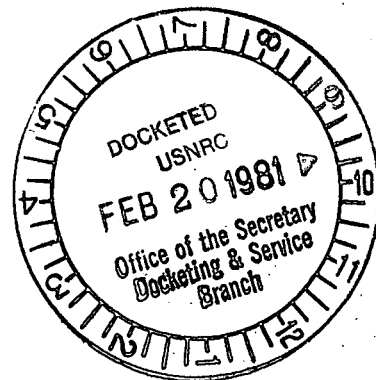
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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. <u>50-361</u> OL
	)	50-362 OL
SOUTHERN CALIFORNIA	)	
EDISON COMPANY, <u>et al.</u> ,	)	SECOND SET OF INTERROGATORIES
(San Onofre Nuclear Generat-	)	TO INTERVENOR GROUPS UNITED
ing Station, Units 2 and 3).	)	AGAINST RADIATION DANGER
	)	(GUARD)

TO: INTERVENORS GROUPS UNITED AGAINST RADIATION DANGER (GUARD):

Applicants in the above-entitled action hereby request that you answer the following set of interrogatories under oath, by an officer or authorized agent, within fourteen (14) days of service hereof, pursuant to Title 10, Part 2, Section 2.740b of the Code of Federal Regulations.

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2                                   INSTRUCTIONS AND DEFINITIONS

3           For purposes of these Interrogatories and your  
4 responses thereto, the following definitions and instructions  
5 shall apply:

6           (a) The terms "GUARD", "you," or "your" refers jointly  
7 to the intervenor responding to these Interrogatories: namely,  
8 Groups United Against Radiation Danger.

9           (b) The term "Applicants" refers jointly to the propo-  
10 nents of these Interrogatories, Southern California Edison  
11 Company and the San Diego Gas & Electric Company.

12           (c) The term "Intervenors" refers jointly to GUARD and  
13 intervenors Friends of the Earth, Mrs. and Mrs. August Carstens,  
14 Mr. and Mrs. Lloyd Von Haden, Mr. Donald May, and Mrs. Donis  
15 Davey, as well as their respective members and agents.

16           (d) The term "person" means any natural person and any  
17 private or public entity of any nature, including without limita-  
18 tion, corporations, firms, partnerships, sole proprietorships,  
19 associations, groups, organizations, trusts and estates.

20           (e) The term "document" means:

21                   (1) The original, or

22                   (2) If the original is not in your custody or  
23 under your control, then a copy thereof.

24           (f) As used herein, unless the context otherwise  
25 requires, the singular number includes the plural and the plural  
26 includes the singular; the masculine gender includes the  
27 feminine, and the feminine includes the masculine.

28           (g) When you are requested to "identify" any document  
you shall include in your response a description sufficient to

1 satisfy the "reasonable particularity" requirement found in Title  
2 10, Part 2, Section 2.741(c) of the Code of Federal Regulations,  
3 including without limitation the following information with  
4 respect thereto:

- 5 (1) The nature of the document;
- 6 (2) Its date;
- 7 (3) The names of its addressor(s) and  
8 addressee(s), if any;
- 9 (4) The name(s) of the person(s) who prepared it;
- 10 (5) The name(s) and address(es) of the present  
11 custodian(s) of the original and any copies thereof; and
- 12 (6) A summary of its contents.

13 In lieu of providing the information specified in Paragraph (g),  
14 Items (1)-(6), you may attach to your responses to these Inter-  
15 rogatories a true copy of such document, identifying the Inter-  
16 rogatory to which it is responsive and stating in your answer  
17 only such of the information specified in Paragraph (g), Items  
18 (1)-(6) as does not clearly appear on the face of such document.

19 If you claim a document is privileged or attorneys'  
20 work product, describe the same generally and state all facts  
21 upon which you base the claim of privilege or the claim such  
22 document constitutes attorneys' work product.

23 (h) When you are requested to "identify" any person,  
24 you shall set forth the full name and last known business  
25 address, residence address, and employer of such person you are  
26 asked to identify.

27 (i) When you are requested to "identify" an "event" you  
28 shall include in your response a description sufficient to

1 satisfy the "reasonable particularity" requirement found in  
2 Title 10, Part 2, Section 2.741(c) of the Code of Federal Regula-  
3 tions, including without limitation the following information  
4 with respect thereto:

5 (1) The general nature and description of the  
6 event;

7 (2) The time of the event;

8 (3) The place of the event;

9 (4) Persons involved in the event; and

10 (5) Available documentation of the event.

11 (j) The term "expert" refers to a person who by virtue  
12 of his knowledge, skill, experience, training or education has  
13 acquired a scientific, technical or specialized knowledge which  
14 can assist the Nuclear Regulatory Commission Atomic Safety and  
15 Licensing Board in understanding the evidence or determining a  
16 fact, opinion, or scientific theory relevant to an issue in this  
17 proceeding.

18 (k) When you are requested to "identify" an "expert" as  
19 that latter term is defined in Paragraph (j) above, you shall set  
20 forth the full name and last known business address, residence  
21 address, academic affiliations, and present employer of each such  
22 "expert" you are asked to identify.

23 (l) In answering these Interrogatories, you shall  
24 furnish all information available to you, your respective agents,  
25 employees, investigators, representatives and attorneys, and not  
26 merely such information as is known from personal knowledge.

27 (m) The term "SONGS 2 and 3" refers to the San Onofre  
28 Nuclear Generating Station, Units 2 and 3.

1 (n) The term "NRC" refers to the United States Nuclear  
2 Regulatory Commission; the term "ASLB" refers to the NRC's Atomic  
3 Safety and Licensing Board before whom contentions in this  
4 proceeding, not otherwise withdrawn, are to be adjudicated.

5 (o) Where these Interrogatories ask whether you have  
6 "analyzed" or intend to "analyze" a document or subject,  
7 Applicants define "analyze" to be where you or your consultants  
8 have reviewed the document or subject in the context of SONGS 2  
9 and 3 and have produced or intend to produce a written report of  
10 that review.

11 (p) The term "EP" refers to the "SONGS 2 and 3  
12 Emergency Plan, July, 1980" provided by Applicants' counsel to  
13 Intervenors' counsel on January 20, 1981, and served on all the  
14 parties hereto on February 3, 1981.

15 (q) The term "EP Responses to NRC Questions" refers to  
16 Applicants' submittals to the Director, Office of Nuclear Reactor  
17 Regulation, dated January 9, 1981, December 5, 1980, and November  
18 26, 1980, pertaining to the EP, which responses were provided by  
19 Applicants' counsel to Intervenors' counsel on January 20, 1981,  
20 and were served on all the parties hereto on February 3, 1981.

21 (r) The term "State Plan" refers to the "State of  
22 California, Nuclear Power Plant Emergency Response Plan", as  
23 revised August, 1978, prepared by the State Office of Emergency  
24 Services and the State Department of Health Services; the term  
25 "Orange Plan" refers to the "Orange County Response Plan, San  
26 Onofre Nuclear Generating Station, December, 1980", prepared and  
27 coordinated by the Orange County Emergency Services Division of  
28 the General Service Agency; the term "San Diego Plan" refers to

1 the "Unified San Diego County, Nuclear Power Plant Emergency  
2 Response Plan, December, 1980", prepared and coordinated by the  
3 Unified San Diego County Emergency Services Organization; the  
4 term "Parks Plan" refers to the "Nuclear Power Plant Emergency  
5 Response Plan, San Onofre, San Clemente and Doheny State Park and  
6 Beach Areas, December, 1980", prepared and coordinated by the  
7 State Department of Parks and Recreation, Pendleton Coast Area;  
8 the term "USMC Plan" refers to the "Emergency Response Plan  
9 (Marine Corps Base, Camp Pendleton, California) 1-79," as revised  
10 by Base Order P3440.1 Ch. 1, prepared and coordinated by the  
11 United States Marine Corps, Camp Pendleton; the term "San Juan  
12 Capistrano Plan" refers to the "San Juan Capistrano Radiological  
13 Emergency Response Plan, San Onofre Nuclear Generating Station,  
14 December, 1980" prepared and coordinated by the City of San Juan  
15 Capistrano Public Works Department; the term "IAEP" refers to the  
16 "Interagency Agreement and Evacuation Procedure for the San  
17 Onofre Plume Exposure Pathway Emergency Planning Zone, December,  
18 1980", which is incorporated by reference in each of the radio-  
19 logical emergency response plans, described above, with the  
20 exception of the State Plan. Each of the emergency response  
21 plans referred to in this paragraph have been provided by  
22 Applicants' counsel to Intervenor's counsel on January 20, 1981  
23 and were served on all the parties hereto on February 3, 1981.

24 (s) The term "offsite assistance agencies" refers  
25 generally to all federal, state, and local governmental agencies  
26 with jurisdiction to respond in any manner in the event of a  
27 radiological emergency at SONGS 2 and 3.

28 ///

1 (t) The term "offsite emergency plans" refers collec-  
2 tively to the plans identified in Paragraph (r) above.

3 (u) The term "Federal Requirements" refers to the  
4 current NRC emergency planning regulations set forth in 10 C.F.R.  
5 §§ 50.33, 50.47, 50.54(q)(r)(s)(t) and (u); and 10 C.F.R.,  
6 Part 50, Appendix E.

7 (v) The term "prior emergency planning responses"  
8 refers to those portions of "Responses to First Set of  
9 Interrogatories to GUARD-ENVIRONMENTAL COALITION OF ORANGE  
10 COUNTY", served herein on August 18, 1978, which pertain to  
11 emergency planning preparedness.

#### 12 INTERROGATORIES

##### 13 INTERROGATORY NO. 1:

14 At the present time do you continue to contend that  
15 Applicants have not complied with 10 C.F.R., Part 50, Appendix E  
16 regarding emergency plans since because of the inadequate funding  
17 and staffing of the several state and local agencies involved  
18 appropriate and coordinated emergency plans cannot be  
19 developed? If so,

20 (a) State each and every fact upon which you base this  
21 contention;

22 (b) Identify each and every document or communication  
23 upon which you base this contention;

24 (c) Identify each and every event upon which you base  
25 this contention;

26 (d) Identify each and every person with knowledge of  
27 the factual basis or bases for this contention, or on whose  
28 writing, opinions, or testimony you base this contention;

1 (e) Identify each and every person whom you expect to  
2 call as a witness, expert or otherwise, at the hearing on this  
3 contention before the ASLB and, as to each witness so identified,  
4 please provide the following information;

5 (i) State the precise subject matter on which the  
6 witness is expected to testify;

7 (ii) State the substance of the facts and opinions  
8 to which the witness is expected to testify; and

9 (iii) Summarize the factual and theoretical bases as  
10 well as any other grounds, for each opinion to which the  
11 witness is expected to testify.

12 INTERROGATORY NO. 2:

13 At the present time do you continue to contend that as  
14 a consequence of increases in freeway use in recent years and the  
15 influx of transient and resident individuals into the exclusion  
16 area and low population zone, there is no longer assurance that  
17 effective arrangements can be made to control traffic or that  
18 there is a reasonable probability protective measures could be  
19 taken on behalf of the individuals in these areas including, if  
20 necessary, evacuation, particularly considering the unique  
21 geographic constraints in these areas; thus Applicants do not  
22 comply with 10 C.F.R., Section 100.3(a) or (b)? If so,

23 (a) State each and every fact upon which you base this  
24 contention;

25 (b) Identify each and every document or communication  
26 upon which you base this contention;

27 (c) Identify each and every event upon which you base  
28 this contention;



1 (d) Identify each and every person with knowledge of  
2 the factual basis or bases for this contention, or on whose  
3 writings, opinions, or testimony you base this contention;

4 (e) Identify each and every person whom you expect to  
5 call as a witness, expert or otherwise, at the hearing on this  
6 contention before the Nuclear Regulatory Commission Licensing  
7 Board and as to each witness so identified, please provide the  
8 following information:

9 (i) State the precise subject matter on which the  
10 witness is expected to testify;

11 (ii) State the substance of the facts and opinions  
12 to which the witness is expected to testify;

13 (iii) Summarize the factual and theoretical bases as  
14 well as any other grounds, for each opinion to which the  
15 witness is expected to testify.

16 INTERROGATORY NO. 3.

17 Do you contend that the offsite emergency plans, taken  
18 together, do not adequately comply with the Federal  
19 Requirements? If so, as to each of the following plans:

20 (a) State Plan;

21 (b) Orange Plan;

22 (c) San Diego Plan;

23 (d) Parks Plan;

24 (e) USMC Plan;

25 (f) San Juan Capistrano Plan; and

26 (g) IAEP.

27 (l) Specify each and every section and subsection of  
28 the Federal Requirements with which you contend the plan does not

1 comply and briefly state the reason why you believe that the plan  
2 does not comply with the section and subsection of the Federal  
3 Requirements so specified;

4 (2) State each and every fact upon which you base this  
5 contention;

6 (3) Identify each and every document or communication  
7 upon which you base this contention;

8 (4) Identify each and every event upon which you base  
9 this contention;

10 (5) Identify each and every person with knowledge of  
11 the factual basis or bases of this contention, or on whose  
12 writing, opinions, or prior testimony you base this contention;

13 (6) Identify each and every person whom you expect to  
14 call as a witness, expert or otherwise, at the hearing on this  
15 contention before the ASLB and, as to each witness so identified,  
16 please provide the following information:

17 (i) State the precise subject matter on which the  
18 witness is expected to testify;

19 (ii) State the substance of the facts and opinions  
20 to which the witness is expected to testify; and

21 (iii) Summarize the factual and theoretical bases as  
22 well as any other grounds, for each opinion to which the  
23 witness is expected to testify.

24 INTERROGATORY NO. 4:

25 Have you analyzed or do you intend to analyze any of  
26 the following plans:

27 (a) EP;

28 (b) State Plan;

- 1 (c) Orange Plan;  
2 (d) San Diego Plan;  
3 (e) Parks Plan;  
4 (f) USMC Plan;  
5 (g) San Juan Capistrano Plan; or  
6 (h) IAEP?

7 If so, as to each of the plans specified above,

8 (1) Identify when such analysis was performed or is  
9 expected to be performed;

10 (2) Identify each and every person who has performed or  
11 who is to perform such an analysis;

12 (3) State whether each such analysis will be  
13 voluntarily provided to Applicants without further motion to  
14 compel; and

15 (4) Identify each and every document or communication  
16 wherein such analysis may be found or is referenced.

17 INTERROGATORY NO. 5:

18 Do you contend that the EP, as clarified by the EP  
19 Responses to NRC questions, does not comply with Federal Require-  
20 ments? If so,

21 (a) Specify each and every section and subsection of  
22 the Federal Requirements with which you contend the EP does not  
23 comply and briefly state the reasons why you believe that the EP  
24 does not comply with the section and subsection of the Federal  
25 Requirements so specified;

26 (b) State each and every fact upon which you base this  
27 contention;

28 ///

1 (c) Identify each and every document or communication  
2 upon which you base this contention;

3 (d) Identify each and every event upon which you base  
4 this contention;

5 (e) Identify each and every person with knowledge of  
6 the factual basis or bases of this contention, or on whose  
7 writing, opinions, or prior testimony you base this contention;

8 (f) Identify each and every person whom you expect to  
9 call as a witness, expert or otherwise, at the hearing on this  
10 contention before the ASLB and, as to each witness so identified,  
11 please provide the following information;

12 (i) State the precise subject matter on which the  
13 witness is expected to testify;

14 (ii) State the substance of the facts and opinions  
15 to which the witness is expected to testify;

16 (iii) Summarize the factual and theoretical bases as  
17 well as any other grounds, for each opinion to which the  
18 witness is expected to testify.

19 INTERROGATORY NO. 6:

20 Aside from the contentions already referred to in the  
21 foregoing Interrogatories, do you contend that there are any  
22 other reasons for finding that the state of onsite and offsite  
23 emergency preparedness for SONGS 2 and 3 does not provide  
24 reasonable assurance that adequate protective measures can and  
25 will be taken in the event of a radiological emergency involving  
26 SONGS 2 and 3? If so, state each such contention in reasonable  
27 detail, and as to each such contention so stated:

28 ///

1 (a) State each and every fact upon which you base this  
2 contention;

3 (b) Identify each and every document or communication  
4 upon which you base this contention;

5 (c) Identify each and every event upon which you base  
6 this contention;

7 (d) Identify each and every person with knowledge of  
8 the factual basis or bases of this contention, or on whose  
9 writing, opinions, or prior testimony you base this contention;

10 (e) Identify each and every person whom you expect to  
11 call as a witness, expert or otherwise, at any hearing on this  
12 contention that may be held before the ASLB and, as to each  
13 witness so identified, please provide the following information:

14 (i) State the precise subject matter on which the  
15 witness is expected to testify;

16 (ii) State the substance of the facts and opinions  
17 to which the witness is expected to testify;

18 (iii) Summarize the factual and theoretical bases as  
19 well as any other grounds, for each opinion to which the  
20 witness is expected to testify; and

21 (f) Specify each and every reason you believe there is  
22 "good cause" under 10 C.F.R. § 2.714(a)(1) to excuse your failure  
23 to raise this contention in this proceeding at an earlier date.

24 INTERROGATORY NO. 7:

25 Do you contend that a full scale exercise which tests  
26 as much of the EP and the offsite emergency plans as is reason-  
27 ably achievable without mandatory public participation is mandated  
28 by the Federal Requirements? If so,

1 (a) Describe in reasonable detail what you believe to  
2 be an adequate exercise scenario to meet Federal Requirements;

3 (b) Identify all Federal, State and local governmental  
4 offsite assistance agencies, as well as private entities, you  
5 believe should be involved in such an exercise to meet Federal  
6 Requirements;

7 (c) Describe in reasonable detail what you believe to  
8 be adequate criteria against which to evaluate the exercise for  
9 purposes of compliance with Federal Requirements.

10 INTERROGATORY NO. 8:

11 Have you discussed any of the following plans with  
12 representatives of the offsite assistance agencies:

- 13 (a) EP;  
14 (b) State Plan;  
15 (c) Orange Plan;  
16 (d) San Diego Plan;  
17 (e) Parks Plan;  
18 (f) USMC Plan;  
19 (g) San Juan Capistrano Plan?

20 If so, as to each of the plans listed above,

21 (1) Identify the person or persons with whom you  
22 discussed the plan and the approximate date of each such discus-  
23 sion; and

24 (2) Identify all documents or communications pertaining  
25 to your discussion of the plan with each person identified in  
26 subparagraph (1) immediately above.

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1 INTERROGATORY NO. 9:

2 Have any of your prior emergency planning responses  
3 contained in your prior answers to interrogatories propounded by  
4 Applicants become incorrect or incomplete in any material  
5 respect? If so

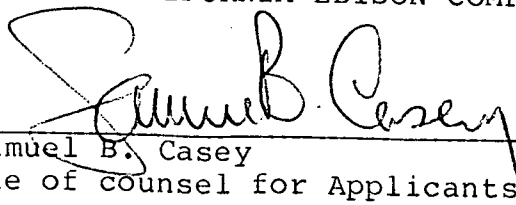
6 (a) Identify each such prior emergency planning  
7 response which is now incorrect or incomplete; and

8 (b) As to each prior response so identified, provide  
9 all such supplementary information, not already provided in  
10 answer to the foregoing interrogatories, as is required by 10  
11 C.F.R. §2.740(e) or by the ASLB Order in this proceeding, dated  
12 August 27, 1980.

13 DATED: February 17, 1981.

14  
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22 By   
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24 One of counsel for Applicants  
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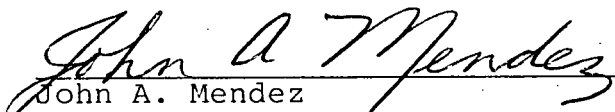
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