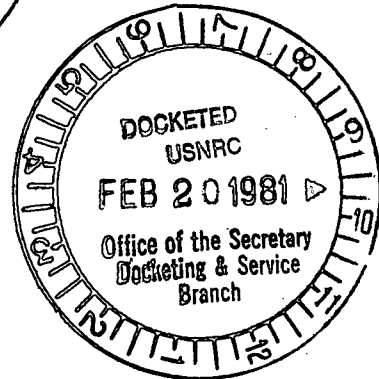
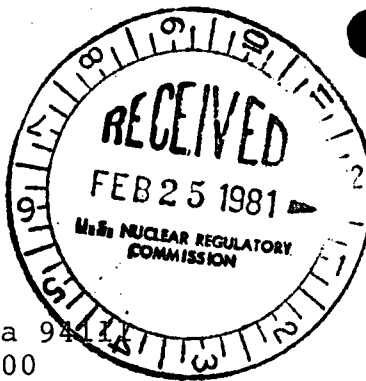


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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-361 OL
)	50-362 OL
SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>et al.</u> ,)	FOURTH SET OF INTERROGATORIES
(San Onofre Nuclear Generat-)	TO INTERVENORS FRIENDS OF THE
ing Station, Units 2 and 3).)	EARTH, MR. AND MRS. AUGUST
)	CARSTENS, MR. AND MRS. LLOYD
)	VON HADEN, MR. DONALD MAY, AND
)	MRS. DONIS DAVEY

TO: INVERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST
CARSTENS, MR. AND MRS. LLOYD VON HADEN, AND MRS. DONIS DAVEY AND
THEIR ATTORNEY OF RECORD:

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.

INSTRUCTIONS AND DEFINITIONS

For purposes of these Interrogatories and your

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1 responses thereto, the following definitions and instructions
2 shall apply:

3 (a) The terms "FOE, et al.," "you," or "your" refers
4 jointly to the intervenors responding to these Interrogatories:
5 namely, Friends of the Earth, Mr. and Mrs. August Carstens, Mr.
6 and Mrs. Lloyd Von Haden, and Mrs. Donis Davey.

7 (b) The term "Applicants" refers jointly to the
8 proponents of these Interrogatories, Southern California Edison
9 Company and the San Diego Gas & Electric Company.

10 (c) The term "Intervenors" refers jointly to FOE, et
11 al. and intervenor Groups United Against Radiation Danger
12 (hereinafter referred to as "GUARD"), as well as their respective
13 members and agents.

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

19 (e) The term "document" means:

20 (1) The original, or

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

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

27 (g) When you are requested to "identify" any document
28 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
15 Interrogatories a true copy of such document, identifying the
16 Interrogatory to which it is responsive and stating in your answer
17 only such of the information specified in Paragraph (g), Items (1)-
18 (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
3 Regulations, including without limitation the following
4 information 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 (h) 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 the Interrogatories ask whether Intervenor
6 have "analyzed" or intend to "analyze" a document or subject,
7 Applicants define "analyze" to be where Intervenor or their
8 consultants have reviewed the document or subject in the context
9 of SONGS 2 and 3 and have produced or intend to produce a written
10 report of 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 Intervenor's 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 Intervenor's 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
19 radiological 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 (t) The term "offsite emergency plans" refers

1 collectively to plans identified in Paragraph (r) above.

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

6 (v) The term "prior emergency planning responses"
7 refers to those portions of "Intervenor, FOE et al. Answers to
8 Interrogatories Propounded by Southern California Edison", served
9 herein on July 28, 1978, which pertain to emergency planning or
10 preparedness.

11 INTERROGATORIES

12 INTERROGATORY NO. 1:

13 At the present time do you continue to contend that the
14 Applicants have not complied with 10 C.F.R., Part 50, Appendix E,
15 regarding emergency plans, since because of the jurisdictional
16 diversity of the several state and local agencies involved and
17 their inadequate fundings and staffing, appropriate and
18 coordinated emergency plans cannot be developed; and that an
19 operating license should not be granted for SONGS, Units 2 and 3,
20 because the various emergency response plans are so complex,
21 overlapping, and difficult to implement that in the event of a
22 nuclear accident the safety of person in the surrounding areas
23 will be imperiled? If so,

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

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

28 (c) Identify each and every event upon which you base

1 your contention;

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

5 (e) Identify each and every person whom you expect to
6 call as a witness, expert or otherwise, at the hearing on this
7 contention before the ASLB and as to each witness so identified,
8 please provide the 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. 2:

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 (1) State each and every section and subsection of the
28 Federal Requirements with which you contend the plan does not

1 comply;

2 (2) State each and every fact upon which you base your
3 contention;

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

6 (4) Identify each and every event upon which you base
7 your contention;

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

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

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

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

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

22 INTERROGATORY NO. 3:

23 Have you analyzed or do you intend to analyze any of
24 the following plans:

25 (a) EP;

26 (b) State Plan;

27 (c) Orange Plan;

28 (d) San Diego Plan;

1 (e) Parks Plan;

2 (f) USMC Plan;

3 (g) San Juan Capistrano Plan; or

4 (h) IAEP?

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

6 (1) Identify when such analysis was performed or is
7 expected to be performed;

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

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

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

15 INTERROGATORY NO. 4:

16 Do you contend that the EP, as clarified by the EP
17 Responses to NRC questions, does not comply with Federal
18 Requirements? If so,

19 (a) State each and every section and subsection of the
20 Federal Requirements with which you contend the EP does not
21 comply;

22 (b) State each and every fact upon which you base your
23 contention;

24 (c) Identify each and every document or communication
25 upon which you base your contention;

26 (d) Identify each and every event upon which you base
27 your contention;

28 (e) Identify each and every person with knowledge of

1 the factual basis or bases of this contention, or on whose
2 writing, opinions, or prior testimony you base this contention;

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

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

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

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

14 INTERROGATORY NO. 5:

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

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

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

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

1 (d) Identify each and every person with knowledge of
2 the factual basis or bases of this contention, or on whose
3 writing, opinions, or prior 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 any hearing on this
6 contention that may be held before the ASLB and as to each
7 witness so identified, please provide the following information;

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

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

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

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

18 INTERROGATORY NO. 6:

19 Do you contend that a full scale exercise which tests
20 as much of the EP and the offsite emergency plans as is
21 reasonably achievable without mandatory public participation is
22 mandated by the Federal Requirements? If so,

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

25 (b) Identify all Federal, State and local governmental
26 offsite assistance agencies, as well as private entities, you
27 believe should be involved in the exercise to meet Federal
28 Requirements;

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

4 INTERROGATORY NO. 7:

5 Have you discussed any of the following plans with
6 representatives of the offsite assistance agencies:

- 7 (a) EP;
8 (b) State Plan;
9 (c) Orange Plan;
10 (d) San Diego Plan;
11 (e) Parks Plan;
12 (f) USMC Plan; and
13 (g) San Juan Capistrano Plan.

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

15 (1) Identify the person or persons with whom you
16 discussed the plan and the approximate date of each such
17 discussion; and

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

21 INTERROGATORY NO. 8:

22 Have any of your prior emergency planning responses
23 contained in your prior answers to interrogatories propounded by
24 Applicants become incorrect or incomplete in any material
25 respect? If so as to each such prior response, provide all such

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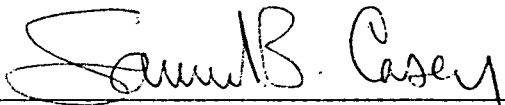
1 supplementary information, not already provided in answer to the
2 foregoing interrogatories as is required by 10 C.F.R. 2.740(e) or
3 by ASLB Order in this proceeding, dated August 27, 1980.

4 DATED: February 17, 1981.

5 DAVID R. PIGOTT
6 SAMUEL B. CASEY
7 JOHN A. MENDEZ
8 CHICKERING & GREGORY

9 CHARLES R. KOCHER
10 JAMES A. BEOLETTO
11 SOUTHERN CALIFORNIA EDISON COMPANY

12 By

13 
14 Samuel B. Casey
15 One of counsel for Applicants
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PROOF OF SERVICE BY MAIL

I declare that:

I am employed in the City and County of San Francisco, California.

I am over the age of eighteen years and not a party to the within entitled action; my business address is Three Embarcadero Center, Twenty-Third Floor, San Francisco, California 94111.

On February 17, 1981, I served the attached "FOURTH SET OF INTERROGATORIES TO INTERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST CARSTENS, MR. AND MRS. LLOYD VON HADEN, MR. DONALD MAY, AND MRS. DONIS DAVEY" on the following in said cause, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco addressed as follows:

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U.S. Nuclear Regulatory Commission
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One of Counsel for Applicants
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