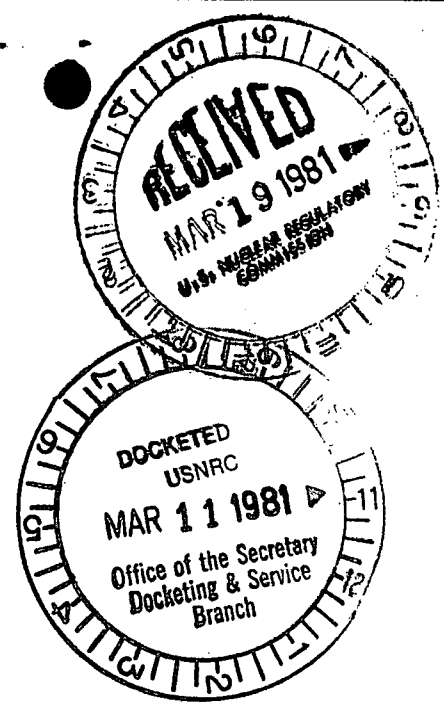


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UNITED STATES OF AMERICA

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)	RESPONSE AND OBJECTIONS OF	
COMPANY, <u>et al.</u> (San Onofre)	APPLICANTS SOUTHERN CALIFORNIA	
Nuclear Generating Station,)	EDISON COMPANY AND SAN DIEGO	
Units 2 and 3).)	GAS & ELECTRIC COMPANY TO THE	
)	FIRST SET OF INTERROGATORIES	
)	TO APPLICANTS FROM GROUPS	
)	UNITED AGAINST RADIATION	
)	DANGER ("GUARD").	

TO: INTERVENOR GROUPS UNITED AGAINST RADIATION DANGER ("GUARD"),
AND THEIR ATTORNEY OF RECORD:

Pursuant to 10 C.F.R. § 2.740b, ApplicantS Southern
California Edison Company and San Diego Gas & Electric Company
hereby responds to "FIRST SET OF INTERROGATORIES TO APPLICANTS,
SOUTHERN CALIFORNIA EDISON COMPANY AND SAN DIEGO GAS & ELECTRIC
COMPANY, FROM GUARD," which were served by mail on Applicants on

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1 February 20, 1981.

2 INSTRUCTIONS AND DEFINITIONS

3 For purposes of the responses contained herein the
4 following definitions and instructions shall apply:

5 (a) The term "these Interrogatories" generally refers
6 to "FIRST SET OF INTERROGATORIES TO APPLICANTS, SOUTHERN CALIFOR-
7 NIA EDISON COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY, FROM
8 GUARD," which were served by mail on Applicants on
9 February 20, 1981.

10 (b) The terms "GUARD," "you," or "your" refers jointly
11 to the Intervenor propounding to these Interrogatories: namely,
12 Groups United Against Radiation Danger.

13 (c) The term "SONGS 2 and 3" refers to the San Onofre
14 Nuclear Generating Station, Units 2 and 3.

15 (d) The term "SCE" refers to the Southern California
16 Edison Company; the term "SDG&E" refers to the San Diego Gas &
17 Electric Company.

18 (e) The term "Applicants" refers jointly to the co-
19 owners of SONGS 2 and 3: SCE, and SDG&E, on whose behalf, as
20 SONGS 2 and 3 Project Director, SCE is authorized to respond to
21 these Interrogatories.

22 (f) The term "NRC" refers to the United States Nuclear
23 Regulatory Commission.

24 (g) The term "EP" refers to the "SONGS 2 and 3
25 Emergency Plan, July, 1980" provided by Applicants' counsel to
26 Intervenors' counsel on January 20, 1981, and served on all the
27 parties hereto on February 3, 1981.
28

1 (h) The term "EP Responses to NRC Questions" refers to
2 Applicants' submittals to the Director, Office of Nuclear Reactor
3 Regulation, dated January 9, 1981, December 5, 1980, and November
4 26, 1980, pertaining to the EP, which responses were provided by
5 Applicants' counsel to Intervenor's counsel on January 20, 1981,
6 and were served on all the parties hereto on February 3, 1981.

7 (i) The term "State Plan" refers to the "State of
8 California, Nuclear Power Plant Emergency Response Plan", as
9 revised August, 1978, prepared by the State Office of Emergency
10 Services and the State Department of Health Services, which is
11 currently effective under State law; the term "Draft State Plan"
12 refers to the "State of California, Nuclear Power Plant Emergency
13 Response Plan", draft for discussion only, January, 1981; the
14 term "Draft Ingestion Pathway Plan" refers to the plan currently
15 being developed under State law by the State of California,
16 Department of Health Services; the term "San Clemente Plan"
17 refers to "City of San Clemente, Radiological Emergency Response
18 Plan Annex to the City's Emergency Operations Plan", adopted on
19 February 18, 1981 and served on all parties hereto on February
20 23, 1981; the term "Orange Plan" refers to the "Orange County
21 Response Plan, San Onofre Nuclear Generating Station,
22 December, 1980", adopted on December 16, 1980, as prepared and
23 coordinated by the Orange County Emergency Services Division of
24 the General Service Agency; the term "San Diego Plan" refers to
25 the "Unified San Diego County, Nuclear Power Plant Emergency
26 Response Plan, December, 1980", adopted on December 8, 1980, as
27 prepared and coordinated by the Unified San Diego County
28 Emergency Services Organization; the term "Parks Plan" refers to

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

24 (j) 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; the term "local offsite
28 assistance agencies" refers collectively to the agencies identi-

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fied in Paragraph (i) above, except the State Office of Emergency Services and the State Department of Health Services.

(k) The term "offsite emergency plans" refers to collectively to the plans identified in Paragraph (i) above, with the exception of the Draft State Plan, and the Draft Ingestion Pathway Plan; the term "local offsite emergency plans" refers collectively to the plans identified in Paragraph (i) above, with the exception of the State Plan, the Draft State Plan, and the Draft Ingestion Pathway Plan.

(l) The term "Federal Requirements" refers to the current NRC emergency planning regulation set forth in 10 C.F.R. §§ 50.33, 50.47, 50.54(q)(r)(s)(t) and (u); and 10 C.F.R., Part 50, Appendix E; the term "NUREG-0654" refers to NUREG-0654/FEMA-REP-1 (Rev. 1), "Criteria for the Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, November, 1980".

(m) The term "GE" refers to a General Emergency as that term is described in NUREG-0654, Appendix 1, at p. 1-16.

(n) The term "EPA PAGs" refers to the projected absorbed dose to individuals in the general population which warrants some protective action, as suggested by the U.S. Environmental Agency in the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents", EPA-520/1-75-001, September, 1975.

(o) The term "90° N. Section" refers to that area within ten miles of SONGS 2 and 3, north of the site, as defined in the EP, Appendix E, at p. 15 and Figure 3a.

1 (p) To enhance the completeness and responsiveness of
2 its answers to these interrogatories, Applicants in response to
3 some of these interrogatoaries have provided references to those
4 portions of the documents, identified in Paragraphs (g), (h),
5 (i), (l), and (n) above, which Applicants believe to contain some
6 or all of the information requested.

7 (q) In all instances Applicants in response to these
8 interrogatories have provided such relevant, unprivileged, non-
9 confidential information which is responsive to each of these
10 interrogatories and which has either been submitted to the NRC by
11 or on behalf of SCE or is available from SCE files or from the
12 personal knowledge of SCE personnel responsible for SONGS 2 and 3
13 emergency planning and preparedness. Specifically, the informa-
14 tion is provided by Mr. David F. Pilmer, Supervising Engineer,
15 SCE. The objections are asserted by Chickering & Gregory,
16 counsel for Applicants.

17 RESPONSE TO INTERROGATORIES

18 INTERROGATORY NO. 1:

19 Describe an event initiating a GE and culminating in a
20 release of radiation which exceeds EPA PAGs for whole body
21 exposure for which evacuation of the 90°N Sector up to five (5)
22 miles from the plant is the appropriate protective measure to be
23 taken. For this postulated accident, identify and discuss:

24 (a) Initiating condition(s) capable of creating this
25 GE.

26 (b) All factors supporting a decision to evacuate as
27 opposed to a decision to take other protective measures not
28 including evacuation.

1 (c) All factors, including, but not limited to
2 projected level of radiation exposure (specify level), meteorological
3 conditions (specify conditions), sufficient time for
4 evacuation (specify time), etc. which support the decision to
5 evacuate the 90°N Sector.

6 (d) The geographical area involved in this evacuation
7 as well as the governmental jurisdiction involved in implementing
8 evacuation and receiving evacuees.

9 (f) the estimated length of time it would take to
10 evacuate the 90°N Sector under ideal conditions.

11 (g) The estimated length of time it would take to
12 evacuate the 90°N Sector if Interstate 5 were incapacitated by a
13 collapsed freeway overpass near Camino de los Mares interchange.

14 (h) The estimated time between the time that the Site
15 Emergency Coordinator declares a general emergency and the time
16 that evacuation is actually begun.

17 (i) (i) The names and addresses of all licensed health
18 care facilities in the 90°N Sector.

19 (ii) The names and addresses of licensed and
20 unlicensed community care facilities of all categories in
21 90°N Sector.

22 (j) (i) The estimated number of ill, elderly, or
23 infirm persons in licensed health care facilities requiring
24 special evacuation by stretcher/ambulance.

25 (ii) The estimated time required for transferring
26 these ill, elderly, or infirm persons to appropriate sites
27 outside of the 90°N Sector.
28

1 (k) (i) The estimated number of persons who are
2 residents of licensed and unlicensed community care and board
3 and care homes in this 90°N Sector who would also require
4 special evacuation.

5 (ii) The estimated time required for transferring
6 these persons to appropriate sites outside of 90°N Sector.

7 (l) The effect, if any, of these "special evacuations"
8 on time estimates for total evacuation of the 90° N Sector as
9 given in (f) and (g) above.

10 RESPONSE TO INTERROGATORY NO.1:

11 Applicants object to this interrogatory because it
12 requests information beyond the bounds of the emergency planning
13 contentions currently at issue in this proceeding for discovery
14 purposes, and because Applicants have no obligation under 10
15 C.F.R., Part 50, Appendix E, to postulate the scenario discussed in
16 this interrogatory as an emergency planning basis. (Reference:
17 NUREG-0654, I.D.)

18 Without waiver of these objections, but in an attempt
19 to facilitate Intervenor's interests, Applicants respond that
20 they have not performed site-specific analyses of any specific
21 initiating events for which the consequences would exceed EPA-
22 PAGs at a distance of five miles in the 90° N. Sector and are,
23 therefore, unable to discuss with specificity the questions
24 presented in (a) through (l) of this interrogatory.

25 (a) Applicants submit that the Reactor Safety
26 Study (WASH-1400, NUREG-75/014) provides a comprehensive
27 discussion of accident event sequences which could, in
28 conjunction with certain meteorological conditions, lead to a

1
2 GE.

3 (b)(c) Applicants refer to the Intervenor
4 "Manual of Protective Action Guides and Protective Actions
5 for Nuclear Incidents, EPA-S201/1-75-001, September, 1975"
6 prepared by the U.S. Environmental Protection Agency.

7 (d) Applicants refer Intervenor to EP, Appendix
8 E, Figure 3a; and the IAEP.

9 (f) Applicants are without sufficient information
10 to answer this interrogatory insofar as the time estimates
11 study performed by Wilbur Smith & Associates for Applicants
12 was not based on "ideal conditions," but rather on conserva-
13 tive assumptions which generally reflect conditions worse
14 than would normally be expected. (Reference: EP, Appendix
15 E, p. 16.) Accordingly, Applicants believe the Wilbur Smith
16 & Associates study yields a conservative estimate of evacua-
17 tion time requirements. Based on the Wilbur Smith &
18 Associates Study, Applicants are informed and believe and on
19 that basis state that evacuation of the 90° N Sector out to
20 five miles would take approximately four hours and 30 minutes
21 in 1980, and five hours and 30 minutes in 1990; evacuation of
22 this sector out to ten miles would take approximately 7 hours
23 and 30 minutes in 1980 and 8 hours and 35 minutes in 1990.

24 (g) Applicants have estimated evacuation times for
25 each sector assuming Interstate 5 or Pacific Coast Highway
26 were completely closed to evacuation traffic. The worst
27 possible case would be if I-5 were cut off immediately south
28 of Camino De Los Mares Interchange. Within the 90° N. Sector
under this circumstance, traffic assigned to Interstate 5

1 would be diverted to the Southwest on major arterials and
2 then out of the plume exposure pathway EPZ via Pacific Coast
3 Highway and Camino Capistrano. Once beyond the disabled
4 section of Interstate 5, traffic would be diverted back to
5 the freeway and out of the area. With this condition,
6 assuming Interstate 5 could not be cleared within the
7 evacuation period, evacuation of the 90° N. Sector would take
8 an estimated 16 hours to complete in 1980, and 20 hours in
9 complete in 1990.

10 Applicants believe these estimates, as well as the
11 estimated given in the Response to Interrogatory No. 1(f),
12 are conservative because special consideration has been given
13 to the capacity of the Pacific Coast Highway (State Rt-1)
14 between Avenida Estacion and Doheny Park Road. Specifically,
15 due to the possibility of land slides during adverse weather
16 conditions along this segment, a conservative capacity
17 estimate of 1,000 vehicles per hour, reflecting a single lane
18 operation was used along this normally two to four-lane
19 segment, in the evacuation time estimate analysis.

20 (Reference: EP, Appendix E, pp. 26 and 32 and Table 8.)

21 (h) Under the Federal Requirements, Applicants
22 prior to SONGS 2 fuel load must demonstrate the existence of
23 a design capability to notify offsite authorities within less
24 than fifteen minutes of recognition of events requiring a
25 declaration of an emergency. Applicants must also demon-
26 strate the existence of a capability by offsite authorities
27 to provide both an alert signal and an informational or
28 instructional message to the population throughout the area

1 within the 10 mile radius of SONGS within fifteen minutes of
2 the time the offsite authorities are notified that a situation
3 exists requiring urgent action. (References: 10 C.F.R., Part
4 50, Appendix E.IV.D.3; NUREG-0654, Appendix 3.) Based on
5 these requirements, Applicants estimate no more than about 15
6 minutes need elapse between the time the SONGS 2 and 3
7 Emergency Coordinator declares a "General Emergency" and the
8 time an evacuation can begin.

9
10 (i)(i) Applicants refer Intervenor to EP,
Appendix E, p. 37 and Table 9; San Clemente Plan, Figure 5.

11
12 (ii) Applicants do not understand what is meant
13 by "unlicensed community care facilities." Applicants refer
Intervenor to subparagraph (i)(i) immediately above.

14 (j)(k)(i) Applicants refer Intervenor to EP,
15 Appendix E, p. 32.

16 (j)(k)(ii) Applicants refer Intervenor to EP,
17 Appendix E, p. 36.

18 (l) None. Applicants refer Intervenor to EP,
19 Appendix E. p. 36.

20 INTERROGATORY NO. 2:

21 Describe an event initiating a GE and culminating in a
22 release of radiation which exceeds EPA PAGs for which evacuation
23 of any sectors within the plume exposure pathway is not the
24 appropriate protective measure. Specify:

25 (a) Initiating condition(s).

26 (b) Factors which support a decision not to evacuate
27 off-site populations.

28 (c) Maximum levels of whole body and thyroid dose

1 exposure rates which are projected within the plume exposure
2 pathway along its radii at two (2) miles, five (5) miles, and ten
3 (10) miles from the plant.

4 (d) Protective measure which would be instituted.

5 RESPONSE TO INTERROGATORY NO. 2:

6 (a) Applicants object to this interrogatory because it
7 requests information beyond the bounds of the emergency planning
8 contentions currently at issue in this proceeding for discovery
9 purposes, and because Applicants have no obligation under 10
10 C.F.R., Part 50, Appendix E, to postulate particular scenarios
11 where evacuation is not the appropriate protective measure.
12 Without waiver of these objections, Applicants further respond
13 that in a "General Emergency" with a radiation release in which
14 EPA-PAGS are projected to be experienced, an evacuation should be
15 considered. Applicants, therefore by definition cannot provide
16 with specificity any initiating conditions for which an
17 evacuation would not be an appropriate consideration in such
18 circumstances.

19 (b) Applicants refer Intervenor to the "Manual of
20 Protective Action Guides and Protective Actions for Nuclear
21 Incidents, EPA-5201 1-75-001, September, 1975, prepared by the
22 U.S. Environmental Protection Agency"; and EP Responses to NRC
23 Questions, No. 432.52.

24 (c) Not applicable. For guidance on maximum levels of
25 projected whole body and thyroid absorbed dose indicating need
26 for protective action refer to document cited in subparagraph (b)
27 immediately above.

28 (d) For guidance on the range of protective actions to

1 be considered based on an event initiating a GE and culminating
2 in a radiation release exceeding EPA PAGS, Applicants refer
3 Intervenor to the to document cited in subparagraph (b) above.

4 INTERROGATORY NO. 3:

5 (a) What mechanical devices, systems or other aids are
6 now in place or planned to be installed to insure the simultan-
7 eous notification of all state and local response organizations
8 warning points that an accident has occurred?

9 (b) How is this system(s) protected from breakdown
10 caused by floods, power outages, subscriber overloading, etc.?

11 (c) How are acknowledgement and verification insured at
12 each response organization?

13 (d) Is voice verification supported by written copy
14 verification?

15 (e) For each offsite response agency, provide the name
16 and title of the person to be notified in case of a GE.

17 (f) What is the estimated amount of time anticipated
18 between the first notification of state and local response
19 organizations and the first follow-up message which will contain
20 information concerning the speed and direction which the plume
21 will travel as well as the actual or projected exposure to
22 radiation, whole body and thyroid, and protective measures
23 recommended?

24 (g) What coordinated arrangements will be used by each
25 organization for dealing with rumors? By whom and by what
26 criteria shall the content of press releases be reviewed prior to
27 releasing information to the public during an emergency?

28 RESPONSE TO INTERROGATORY NO. 3:

1 (a) Applicants will rely upon a direct private line
2 telephone circuit dedicated for the purpose of simultaneously
3 notifying state and local response organizations' warning points
4 that an accident has occurred.

5 (b) This circuit is not subject to overload conditions
6 and will otherwise be constructed to resist power outages or
7 flood damage.

8 (c) Verification is not needed for a private telephone
9 circuit. For examples of verification procedures when a
10 commercial telephone circuit is used for emergency notification
11 purposes refer to Orange Plan v. B.l.c.(1), and San Clemente
12 Plan, I.D.2.

13 (d) Current notification verification procedures do not
14 require written copy verification.

15 (e) In each case, Applicants contact the person on duty
16 at the designated communication point of the offsite assistance
17 agency. Applicants do not contact a specific name or title. For
18 agencies to be contacted by Applicants refer to EP, 5.4 and Table
19 5-4. In addition, Applicants will also notify the City of San
20 Juan Capistrano.

21 (f) Twenty or thirty minutes.

22 (g) The coordination of press releases is performed at
23 the primary emergency operations center by representatives
24 assigned by each jurisdiction. (Reference: IAEP, IX.B.) A
25 Media Operations Center will also be established at the San
26 Clemente Boys Club to coordinate media activity.

27 INTERROGATORY NO. 4:

28 (a) Describe what type, number and location of all.

1 devices which are planned to be installed for the purpose of
2 notifying the public within the plume exposure pathway EPZ that
3 an emergency exists.

4 (b) What effect will power outages within the ten (10)
5 mile EPZ have on the capability of the early warning system to
6 function as designed?

7 (c) What is the anticipated cost of the devices, and of
8 their installation?

9 (d) Who will bear the cost of these devices and of
10 their installation?

11 (e) What is the anticipated yearly cost of maintaining
12 these devices?

13 (f) Who will bear the cost of maintaining these
14 devices?

15 (g) If the answer to (d) and/or (f) is "Applicant", are
16 these costs to be factored into the rate base as part of the
17 capital expenditure for the plant units?

18 (h) What is the projected date that this system will be
19 in place?

20 RESPONSE TO INTERROGATORY NO. 4:

21 (a) Applicants plan on constructing a siren-type
22 alerting system throughout the populated portions of the plume
23 exposure pathway EPZ which will meet the standards prescribed in
24 NUREG-0654, Appendix 3. The exact numbers, types, and locations
25 of equipment are not finally determined at this time.

26 (b) Sirens will not operate without power. Applicants
27 do not believe that any one power outage will impair the ability
28 of the entire system to operate, although some portions of the

1 system may be temporarily disrupted.

2 (c) Applicants have not yet determined the installed
3 cost of this system.

4 (d) Applicants will bear the full cost of installing
5 these devices.

6 (e) Applicants have not yet estimated the annual
7 maintenance costs.

8 (f) Applicants will bear the full cost of maintaining
9 these devices.

10 (g) Yes.

11 (h) The projected date that this system will be in
12 place is July 1, 1981.

13 INTERROGATORY NO. 5:

14 For each of the jurisdiction [sic] within the entire
15 ten (10) mile EPZ plume exposure pathway provide the name, title,
16 and address of the person having the authority to order evacua-
17 tion when it has been recommended by the licensee.

18 RESPONSE TO INTERROGATORY NO. 5:

- 19 1. Camp Pendleton - Commanding General, U.S. Marine
20 Corps Base.
- 21 2. Orange County - Chairman, Orange County Board of
22 Supervisors.
- 23 3. San Diego County - Chief Administrative Officer, by
24 delegation of the authority by the Board of Supervisors.
- 25 4. City of San Clemente - City Manager by delegation
26 of authority by the Mayor and the City Council.
- 27 5. City of San Juan Capistrano - City Manager by
28 delegation of authority by the Mayor and the City Council.

1 6. State Parks and Beaches, Pendleton Coast Area -
2 Manager of the Pendleton Coast Area.

3 INTERROGATORY NO. 6:

4 What systems, policies and guidelines are in place to
5 resolve disputes within and among local jurisdictions concerning
6 the indications for evacuation in doubtful cases.

7 RESPONSE TO INTERROGATORY NO.6:

8 Disputes between local jurisdictions will not occur as
9 it is the legal responsibility of the authorities within each
10 involved jurisdiction to determine what level of protective
11 action to take on behalf of the persons and property within their
12 respective jurisdictions. The judgments and actions of one
13 jurisdiction cannot be disputed by another jurisdiction. In the
14 case of SONGS 2 and 3, each jurisdiction's actions are to be
15 communicated and coordinated under the IAEP, but are not
16 dependent upon agreement by the other involved jurisdictions.

17 (Reference: IAEP).

18 INTERROGATORY NO. 7:

19 In the event that evacuation has been undertaken and
20 the levels of projected radiation exposure thereafter increase by
21 a large factor over original projections, so that EPA PAGs are
22 substantially exceeded for the evacuees en route to the EPZ
23 borders, what protective actions are planned to mitigate the
24 threat to the public health?

25 RESPONSE TO INTERROGATORY NO.7:

26 Applicants believe that the appropriate action by
27 persons in the act of evacuation, under the conditions stated in
28 this interrogatory, is to continue evacuation.

1 INTERROGATORY NO. 8:

2 Do the plans under consideration in this licensing
3 proceeding take into account the likelihood of "spontaneous"
4 evacuation outside the ten (10) mile EPZ plume exposure pathway
5 which may interfere with efforts within the EPZ? If so, how?

6 RESPONSE TO INTERROGATORY NO. 8:

7 No. Applicants are informed and believe, and on that
8 basis, state that if evacuation should spontaneously occur
9 outside of ten-mile EPZ plume exposure pathway, it will not
10 substantially interfere with evacuation within the EPZ.

11 INTERROGATORY NO. 9:

12 Do the plans under consideration in this licensing
13 proceeding take into account the likelihood of "spontaneous"
14 evacuation within the ten (10) miles EPZ plume exposure pathway
15 but outside of the sector or zone for which evacuation has been
16 recommended? If so, how?

17 RESPONSE TO INTERROGATORY NO. 9:

18 Such evacuation is assumed. (Reference: EP, Appendix
19 E.) Applicants are informed and believe, and on that basis state
20 that such evacuation will not interfere or jeopardize any
21 activities set forth in the EP or the offsite emergency plans.

22 INTERROGATORY NO. 10:

23 Explain how spontaneous evacuation by the public will
24 be discouraged.

25 RESPONSE TO INTERROGATORY NO. 10:

26 Applicants, in cooperation and consultation with local
27 offsite assistance agencies, are developing a public information
28 and education program as required by NUREG-0654, II.G.

1 Applicants hope that upon implementation of the program the
2 general public will become better informed as to the actual risks
3 involved and will evacuate only where such protective action is
4 recommended by local authorities. It is not clear that efforts
5 to discourage free-will evacuation would be desirable under any
6 emergency circumstances.

7 INTERROGATORY NO. 11:

8 Have arrangements been made for appropriate reception
9 centers for evacuees from licensed health facilities, licensed
10 community care facilities, and other populations requiring
11 specialized care? If so, state the nature of the arrangements,
12 the name(s) of the persons responsible for implementing them, and
13 the addresses where these evacuees requiring special care will be
14 received.

15 RESPONSE TO INTERROGATORY NO. 11:

16 The offsite agencies' emergency response plans have
17 arrangements for reception and care center for each respective
18 jurisdiction, and have considered the special requirements of
19 persons needing specialized care. (References: Orange Plan,
20 Section V - Table 2.2, San Diego Plan, Section VIII.C and XIII -
21 Table 2; IAEP, Attachment 9; USMC Plan, K-3-B.) Evacuees in
22 Orange County requiring special care will be relocated via
23 cooperating ambulance companies to:

- 24 ° U.C. Irvine Medical Center
25 101 City Drive South
26 Orange, California;
- 27 ° Fairview State Hospital
28 2501 Harbor Blvd.
 Costa Mesa, California;
- ° St. Joseph's Hospital

1 1100 W. Stewart Drive
2 Orange, California; or

- 3 ° Children's Hospital
4 1109 W. La Veta Ave,
Orange, California.

5 There are no special facilities within the plume exposure pathway
6 EPZ in San Diego County. Persons needing hospital attention will
7 be relocated via ambulance to:

- 8 ° Tri-City Hospital
9 4002 Vista Way
Oceanside, California;

- 10 ° Palomar Hospital, 550 E. Grand Ave,
Escondido, California, or

- 11 ° Oceanside Community Hospital, 1100 5th Street,
12 Oceanside, California.

13 (Reference: IAEP, VIII. A.1 and B.)

14 INTERROGATORY NO. 12:

15 What provisions have been made for securing adequate
16 supplies of thyroid blocking agents for the population around
17 SONGS 2 and 3? What drug will be used? Are any written agree-
18 ments in existence? If so, provide copies. What is the name of
19 the vendor who will supply? How will it be stored and
20 distributed? Are supplies presently available if needed?

21 RESPONSE TO INTERROGATORY NO. 12:

22 Applicants are without sufficient information to state
23 what provisions have been made for securing adequate supplies of
24 potassium iodide for the general population around SONGS 2 and
25 3. SCE currently has potassium iodide at SONGS to be used by its
26 workers during emergency conditions under a physician's direct-
27 ion. SCE also plans to supply potassium iodide to Orange County
28 for distribution to Orange County emergency response workers, as

1 prescribed by an Orange County physician. (Reference: Orange
2 Plan, IV.F.3.) Aside from these locations, SCE is without
3 knowledge as to where potassium iodide may also be available, and
4 how such drug may be distributed by offsite assistance
5 agencies. SCE does not believe wide-spread public distribution
6 of potassium iodide as a public protective measure is either
7 necessary or appropriate. (Reference: State Plan, Appendix B;
8 NUREG-0654, p. 9.)

9 INTERROGATORY NO. 13:

10 (a) Regarding the public information program, what
11 provisions have been made with the phone company for inclusion of
12 emergency information pertinent to a nuclear emergency in the
13 phone book?

14 (b) Provide a sample of proposed copy, if developed, as
15 well as copies of any agreements which have been made with the
16 phone company concerning inclusion of such information.

17 (c) What information will be included in programs to
18 acquaint news media with emergency plans and information concern-
19 ing radiation?

20 (d) Will the information include reference to the
21 harmful long-range effects of low level radiation?

22 (e) Will the public receive information concerning the
23 Price-Anderson Act?

24 RESPONSE TO INTERROGATORY NO.13:

25 (a) Applicants have made no such provision. With
26 respect to offsite assistance agencies, Applicants are without
27 sufficient information to specifically respond to this interroga-
28 tory. SCE is currently developing a public information program,

1 to commence prior to Unit 2 fuel load, which will include the
2 subject matter and frequency specified in Section II.G.1 of
3 NUREG-0654/FEMA REP-1, Revision 1. This program will be directed
4 to the resident and visitor population within the plume exposure
5 pathway EPZ and contiguous area. A coordinated program is
6 planned with elements carried out by local government in addition
7 to SCE. (Reference: EP Responses to NRC Questions, No. 432.28.)

8 (b) Not applicable.

9 (c) Applicants anticipate meetings with the news media
10 at least annually to acquaint news media with the emergency
11 plans, information concerning radiation, and points of contact
12 for release of public information in an emergency. Such
13 information has not yet been developed.

14 (d) No. Applicants anticipate that general information
15 on public health considerations involving ionizing radiation and
16 commercial nuclear power plant operation will be provided, as
17 required by the Federal Requirements, as part of Applicants'
18 public information and education program. (Reference: NUREG-
19 0654, II.G.1.a) Applicants submit that educational material on
20 the controversial subject of the long-term public health effects
21 of low-level radiation is neither appropriate, nor required for
22 emergency planning purposes, under the Federal Requirements.
23 Applicants further submit that there is currently no generally
24 accepted basis assessing what, if any, long range effect low-
25 level radiation has on the human being. (Reference: U.S. Dept.
26 of Health, Education and Welfare, Report of the Interagency Task
27 Force on the Health Effects of Ionizing Radiation, June, 1979,
28 pp. 28-44.

1 (e) No. Such information is not required to be
2 included under the Federal Requirements.

3 INTERROGATORY NO. 14:

4 (a) Have you offered funding or technical assistance to
5 any of the state and/or local agencies who have been involved in
6 developing the response plans for a nuclear accident at SONGS 2
7 and 3?

8 (b) What budget allocations have been made by each of
9 the state and/or local agencies for which plans have been
10 prepared to meet the planning effort involved?

11 (c) What budget allocations have been made by these
12 state and local agencies to review and update the plans currently
13 under consideration?

14 (d) For each of the state and local agency plans,
15 provide the names, addresses, and titles of persons with whom you
16 worked in developing plans and the dates of all meetings at which
17 you worked with these persons or their representatives on
18 developing the plans.

19 RESPONSE TO INTERROGATORY NO. 14:

20 (a) Yes.

21 (b)(c) Applicants are without sufficient information
22 to set forth specific "budget allocations" made by state and
23 local agencies.

24 (d) The dates of "all meetings" are too numerous to
25 reconstruct. The following are the principal names and
26 jurisdictions of representatives with whom a planning interface
27 was established and is being maintained:

28 //

Name

Jurisdiction

J. Hunt	San Diego County
Col. R. Rothwell	Camp Pendleton
R. Coleman	San Clemente
J. Stowe	State Parks
C. Ferguson	San Juan Capistrano
J. Swanson	Capistrano School District
C. Nash	American Red Cross
B. Turner	Orange County
M. Reed	State of California, Office of Emergency Services
J. Ward	State of California, Department of Health Services

INTERROGATORY NO. 15:

Is it your position that the plans as submitted represent mutual understanding and acceptance by and among all of the state and local jurisdictions of their responsibilities for safeguarding the public health and safety in the event of a nuclear accident? Provide documentation for your position.

RESPONSE TO INTERROGATORY NO. 15:

Yes. Applicants are informed and believe and, on that basis, state that the involved offsite assistance agencies currently have a mutual understanding and acceptance of their responsibilities for safeguarding the public health and safety in the event of a nuclear accident. Documentation of Applicants' position is contained in the offsite emergency plans served upon GUARD on February 3, 1981, and February 23, 1981.

INTERROGATORY NO. 16:

(a) Do you plan to obtain radiological laboratory services from a laboratory closer than LFE Environmental Analysis Laboratories in Richmond, Calif.?

(b) If not, why not?

1 RESPONSE TO INTERROGATORY NO. 16:

2 (a) No.

3 (b) LFE Environmental Analysis Laboratories is a well
4 qualified institution, and with modern transportation capabili-
5 ties, is a viable choice. (Reference: EP Response to NRC
6 Questions, No. 432.23).

7 INTERROGATORY NO. 17:

8 (a) For each 90° Sector, locate and describe shelters
9 which could be used by the public in a general emergency to
10 reduce the risk of exposure to radioactive contamination.

11 (b) What arrangements have been made to secure access
12 to these shelters in case of a General Emergency?

13 (c) What is the estimated degree of protection from the
14 risk of exposure to whole body and thyroid contamination in
15 excess of EPA PAGs which is afforded by these shelters?

16 (d) In each of the shelters described above, how many
17 persons can be accomodated and for how long?

18 RESPONSE TO INTERROGATORY NO. 17:

19 (a) Applicants object to this interrogatory because it
20 requests information beyond the bounds of emergency planning
21 contentions currently at issue in this proceeding for discovery
22 purposes, and because Applicants have no obligation under 10
23 C.F.R., Part 50, Appendix E, to locate and describe all shelters
24 that may reduce the risk of exposure to radioactive contamination
25 within the plume exposure pathway EPZ. Without waiver of these
26 objections, Applicants are without sufficient information to
27 specifically respond to this interrogatory. Generally speaking,
28 any shelter reduces the risk of exposure to airborne radiation

1 contamination. Shelter provided by a normal wood structure with
2 windows and doors closed and ventilation turned off can reduce
3 the direct exposure to the plume by 10% and would provide good
4 protection from the risk of inhalation of radioactive gases and
5 vapors for about two hours. (References: EP Responses to NRC
6 Questions, No. 432.51; NUREG-0654, II. J. 10. m., note 2; Walter
7 E. Strobe and John Devaney, Effectiveness of Civil Defense
8 System, Center for Planning and Research, for the Federal
9 Emergency Management (6/1979); Aldrich, D.C., and D.M. Ericson,
10 "Public Protection Strategies in the Event of a Nuclear Reactor
11 Accident: Multicompartment Ventilation," SAND-77-1555, Sandia
12 Laboratories, Albuquerque, N.M. (1978); Aldrich, D.C., P.E.
13 McGrath, and N.C. Rasmussen, "Examination of the Radiological
14 Emergency Measures for Nuclear Reactor Accidents --- Involving
15 Core Melt," SAND-78-0545, Sandia Laboratories, Albuquerque,
16 N.M.).

17
18 (b)(c) Refer to the response set forth in
19 subparagraph (a) immediately above.

20 (d) Refer to the response set forth in subparagraph (a)
21 above. Applicants further object to this interrogatory on the
22 ground that it would be burdensome and oppressive to require
23 Applicants to undertake the study an answer to this interrogatory
24 requires, because the information upon which such a study could
25 be based is as available to GUARD as it is to Applicants.

26 INTERROGATORY NO. 18:

27 (a) Is it your position that the present "state of the
28 art" of equipment for monitoring post-accident levels of radio-
active materials is sufficiently developed to assure accurate

1 measurements of releases of various radionuclides and projection
2 of dose exposure rates for whole body and thyroid exposure for a
3 spectrum of accidents ranging from "moderately serious" to "worst
4 case" accidents at various atmospheric levels?

5 (b) If your answer is "yes," provide current data in
6 support of the reliability of "state of the art" monitoring
7 equipment.

8 (c) If your answer is "no," describe the areas in which
9 inaccuracies in detecting, monitoring and projecting levels of
10 inaccuracies are most likely to occur along the spectrum of
11 accidents referred to in (a) above.

12 RESPONSE TO INTERROGATORY NO. 18:

13 (a) Yes.

14 (b) Applicants rely upon the guidance set forth by the
15 NRC and contained in NUREG-0660, "NRC Action Plan Developed as a
16 Result of the TMI-2 Accident"; NUREG-0737, "Clarification of TMI
17 Action Plan Requirements"; and Regulatory Guide 1.97 (Rev. 2),
18 January, 1981, as the appropriate guidance for instrumentation to
19 monitor radiation levels in the post-accident environment.

20 (c) Not applicable.

21 INTERROGATORY NO. 19:

22 (a) To what extent is radiation measurement
23 instrumentation which is now in place both onsite and offsite at,
24 above, or below the current "state of the art" of radiation
25 measurement instrumentation?

26 (b) Provide a table which identifies, locates and
27 classifies radiation measurement instrumentation both onsite and
28 offsite as at, above, or below the current state of the art for

1 such equipment for all equipment within the 10 mile EPZ plume
2 exposure pathway and the 50 mile ingestion exposure path.

3 RESPONSE TO INTERROGATORY NO. 19:

4 (a) Applicants will put in place a "state of the art"
5 radiation measurement instrumentation designed along guidelines
6 set by the NRC in NUREG-0737, "Clarification of TMI Action Plan",
7 Item II, F. 1. and Regulatory Guide 1.97 (Rev. 2), on a schedule
8 consistent with NRC requirements.

9 (b) The information requested in this interrogatory is
10 set forth in EP Responses to NRC Questions, No. 432.40.

11 INTERROGATORY NO. 20:

12 State the assumptions upon which the exclusion of
13 women, but not of men, of reproductive age from emergency work is
14 based.

15 RESPONSE TO INTERROGATORY NO. 20:

16 Applicants object to this interrogatory because it
17 requests information beyond the bounds of the emergency planning
18 contentions currently at issue in this proceeding for discovery
19 purposes, and because Applicants have no obligation under 10
20 C.F.R., Part 50, Appendix E, to question the assumptions upon
21 which the exclusion of women, but not of men, of reproductive age
22 from emergency work is based. Without waiver of these
23 objections, Applicants rely on the "Manual of Protective Action
24 Guides and Protective Actions for Nuclear Incidents, August, 1975
25 (EPA-520/1-75-011)"; and Draft ANSI 13.12. (Reference: EP
26 Responses to NRC Questions, No. 432.53.) Applicants submit that
27 the exclusion is based on the greater sensitivity of the fetus
28 and unborn children to radiation exposure and the fact that women

1 of reproductive age may not know they are pregnant when called to
2 service in an emergency involving potential radiation exposure.

3 INTERROGATORY NO. 21:

4 Provide age data which gives the age range, the mode,
5 the mean and the standard deviation for all onsite workers in the
6 following categories:

7 (a) Men

8 (b) Women

9 (c) Men and women combined.

10 RESPONSE TO INTERROGATORY NO. 21:

11 Applicants object to this interrogatory because it
12 requests information beyond the bounds of the emergency planning
13 contentions currently at issue in this proceeding for discovery
14 purposes, and because Applicants have no obligation under 10
15 C.F.R., Part 50, Appendix E, to provide "the age range, the mode,
16 the mean and the standard deviation for all on-site workers."

17 INTERROGATORY NO. 22:

18 Provide the data requested in INTERROGATORY NO. 21 for
19 all offsite health personnel, hospital based and otherwise, who
20 will be involved in work with contaminated injured or ill persons
21 and who are likely to be exposed to levels of radiation in excess
22 of EPA PAGs.

23 RESPONSE TO INTERROGATORY NO. 22:

24 Applicants object to this interrogatory because it
25 requests information beyond the bounds of the emergency planning
26 contentions currently at issue in this proceeding for discovery
27 purposes, and because Applicants have no obligation under 10
28 C.F.R., Part 50, Appendix E, to provide "the age range, the mode,

the mean and the standard deviation" for "all offsite health
1 personnel . . . likely to be exposed to levels of radiation in
2 excess of EPA PAGs."

3 INTERROGATORY NO. 23:

4 Provide the data requested in INTERROGATORY NO. 21 for
5 all emergency workers from the various state and local response
6 agencies who will be likely to be exposed to levels of radiation
7 in excess of EPA PAGs.

8 RESPONSE TO INTERROGATORY NO 23:

9 Applicants object to this interrogatory because it
10 requests information beyond the bounds of the emergency planning
11 contentions currently at issue in this proceeding for discovery
12 purposes, and because Applicants have no obligation under 10
13 C.F.R., Part 50, Appendix E, to provide "the age range, the mode,
14 the mean and the standard deviation" for "all emergency workers
15 from the offsite assistance agencies "likely to be exposed to
16 levels of radiation in excess of EPA PAGs"

17 INTERROGATORY NO. 24:

18 In each of the state and local emergency response
19 agencies, what commitments are in place to assure adequate
20 numbers of emergency workers to protect the public health and
21 safety of workers who are likely to be exposed to levels of
22 radiation in excess of EPA PAGs?

23 RESPONSE TO INTERROGATORY NO. 24:

24 Applicants interpret the reference to "workers" in this
25 interrogatory to mean available personnel. Applicants are
26 informed and believe and on that basis state that there are
27 sufficient personnel available within the offsite assistance
28

1 agencies, as well as through mutual aid agreements and voluntary
2 cooperation, to implement the offsite emergency plans.

3 INTERROGATORY NO. 25:

4 In each of the hospitals listed as capable of treating
5 radioactively contaminated patients, what commitments are in
6 place for assuring that adequate numbers of health personnel to
7 care for injured or ill contaminated patients will agree to
8 remain on duty and be exposed to increased risk of contamination
9 with radioactivity?

10 RESPONSE TO INTERROGATORY NO. 25:

11 On August 28, 1980, SCE entered a contract with
12 Tri-City Hospital to provide medical care and treatment for SCE
13 personnel who have been injured at SONGS; or who have been
14 exposed to excessive radiation; or who have injuries complicated
15 by radioactive contamination as a consequence of a radiological
16 accident at SONGS; and to provide medical care and treatment for
17 individuals injured in support of activities at SONGS, whose
18 injuries may be complicated by radioactive contamination as a
19 consequence of a radiological accident at SONGS.

20 On September 10, 1980, a similar contract was entered
21 between SCE and South Coast Community Hospital. Both facilities
22 are located outside the plume exposure pathway EPZ. Applicants
23 are also in the process of negotiating a similar contract with
24 San Clemente General Hospital, which is located approximately
25 eight miles from SONGS.

26 In addition to these contractual arrangements, SCE has
27 provided all necessary equipment to those facilities, and will
28 conduct a four-day training program for the benefit of the

1 medical staffs of these hospitals on the topics of handling and
2 treatment of radioactively contaminated and injured patients, and
3 the medical basis for decision-making in the event of offsite
4 release of radioactivity from a nuclear power plant.

5 Given these contractual arrangements, equipment provi-
6 sions, and training opportunities, plus the relative distance of
7 these facilities from SONGS, Applicants have no reason to believe
8 that adequate numbers of health personnel will not remain on duty
9 to care for patients suffering from overexposure to radiation or
10 injuries complicated by radiation contamination.

11 INTERROGATORY NO. 26:

12 (a) Have any mutual aid agreements specific to nuclear
13 power plant emergencies been entered into by and among the
14 response agencies and/or Applicant?

15 (b) If so, give the names of the parties to the mutual
16 aid agreements and the effective dates of the agreements.

17 (c) Provide copies of any and all mutual aid agreements
18 which you have in your possession.

19 RESPONSE TO INTERROGATORY NO. 26:

20 (a) (b) Yes, Applicants have specific information on
21 the following agreements:

22 1. IAEP;

23 2. Agreements contained in Appendix A to the EP.

24 In addition to these agreements, Applicants are
25 informed and believe and, on that basis, state that other mutual
26 assistance agreements exist between the various offsite assist-
27 ance agencies which would be implemented in the event of an
28 emergency at SONGS requiring such assistance.

1 (c) The IAEP and EP have previously been served on
2 GUARD. Applicants have no other mutual and agreements in their
3 possession.

4 INTERROGATORY NO. 27:

5 Provide the names and addresses of all persons in the
6 various response agencies who have taken courses in radiological
7 monitoring, the location and date of their training in radiolo-
8 gical monitoring, the number of hours of the training, and the
9 qualifications of the persons providing the training, and whether
10 the persons listed herein as trained in radiological monitoring
11 are committed to serving the public health and safety as radiolo-
12 gical monitoring personnel in the event of a nuclear accident at
13 SONGS 2 and 3.

14 RESPONSE TO INTERROGATORY NO. 27:

15 Applicants are without sufficient information to
16 specifically respond to this interrogatory. Within the next two
17 months, Applicants are providing two, four-day, twenty-four hour,
18 radiological emergency training courses open to all personnel
19 from the local offsite assistance agencies, designated to attend
20 by their respective agencies. Applicants expect these courses
21 will be well attended. In any event, Applicants are informed and
22 believe and, on that basis, state that sufficient radiological
23 maintaining personnel will be available in the event of an
24 emergency at SONGS 2 and 3 to provide the radiation assessment
25 information necessary to protect the public health and safety.

26 INTERROGATORY NO. 28:

27 Provide the names and addresses of all health personnel
28 within the 10 mile EPZ plume exposure pathway and the 50 mile

1 ingestion exposure pathway who have had special training in
2 decontamination of injured or ill persons, and who are qualified
3 to undertake the care and supervision of care of such patients.
4 Provide the location, dates, and hours of their training, and the
5 qualification of their instructors, and the availability of these
6 specially trained health personnel in the event of a nuclear
7 accident at SONGS 2 and 3.

8 RESPONSE TO INTERROGATORY NO.28:

9
10 Applicants are without sufficient information to
11 provide the names and addresses of all health personnel within
12 the 10-mile EPZ and the 50-mile ingestion exposure pathway who
13 have had special training in decontamination of injured or ill
14 persons, and who are qualified to undertake the care and supervi-
15 sion of such patients.

16 Beginning March 23, 1981, SCE will conduct a twenty-
17 four hour, four-day radiological emergency training course for
18 all medical and emergency personnel in Orange County, designated
19 to attend this training by their respective agencies or hospi-
20 tals. Representatives from various agencies in Orange County,
21 the Cities of San Juan Capistrano and San Clemente, San Clemente
22 General Hospital, Tri-Cities Hospital and South Coast Community
23 Hospital are expected to attend. Teaching the course will be a
24 group of expert consultants under contract to SCE, headed by Dr.
25 R.E. Linneman, Professor, the University of Pennsylvania Medical
26 School.

27 A similar course will be conducted in San Diego County
28 in Mid-April, 1981.

The four topics on the syllabus of these courses are:

- 1 ° Handling and Treatment of the Radioactively
- 2 Contaminated and Injured Patient for County,
- 3 Hospital, and Emergency Personnel.
- 4 ° Medical Basis for Decision-Making in the Event
- 5 of an Offsite Release of Radioactivity.
- 6 ° Rescue, Handling and Transport of the Radio-
- 7 actively Contaminated Injured Patient.
- 8 ° Handling of an Offsite Release of Radio-
- 9 activity from Nuclear Power Plant by Policemen
- 10 and Sheriff's Department.

11 INTERROGATORY NO. 29:

12 Provide the dates, times and extent of all drills and

13 exercises which are planned to test the adequacy of the planning

14 effort and its integration and coordination among the various

15 state and local agencies and the applicants, as well as any and

16 all documents, memoranda, and correspondence which has [sic]

17 passed between Applicants and any of the state and local response

18 agencies and/or Federal agencies responsible for concurring in

19 plan adequacy which critiques, analyzes, comments upon or

20 assesses any drill or exercise which has already taken place to

21 test the adequacy of the emergency response plans, in any

22 respect.

23 RESPONSE TO INTERROGATORY NO. 29:

24 Applicants plan to conduct an exercise early in April,

25 1981 to test the adequacy of EP and the offsite assistance

26 plans. Applicants do not possess any documents pertaining to

27 critiques or analysis of exercises which were conducted more

28 recently than the adoption date of the offsite emergency plans

served on GUARD on February 3 and 23, 1981. For a full

discussion of the exercises and drills planned by Applicants to

assure continued on-site and offsite emergency preparedness at

1 SONGS 2 and 3 refer to EP Responses to NRC Questions, No. 432.57.

2 INTERROGATORY NO. 30:

3 Provide cost data which demonstrates the cost to the
4 Applicants of the planning, equipment purchase, training, testing
5 and evaluating of personnel, systems, and equipment necessary in
6 order to attempt to meet the criteria which have been set forth
7 in NUREG-0654 FEMA REP-1 Rev. 1.

8 RESPONSE TO INTERROGATORY NO. 30:

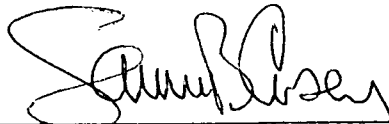
9 The cost data information requested in this interroga-
10 tory has not been developed. In any event, Applicants object to
11 this interrogatory because it seeks information beyond the bounds
12 of the emergency planning contentions at issue in this proceeding
13 for discovery purposes, and because Applicants have no obligation
14 under 10 C.F.R., Part 50, Appendix E, to disclose its costs
15 incurred to meet the Federal Requirements.

16
17 DATED: March 10, 1981

Respectfully submitted,

18 DAVID R. PIGOTT
19 SAMUEL B. CASEY
20 JOHN A. MENDEZ
CHICKERING & GREGORY

21 CHARLES R. KOCHER
22 JAMES A. BEOLETTO
SOUTHERN CALIFORNIA
23 EDISON COMPANY

24 By 
25 Samuel B. Casey
26 One of Counsel for Applicants
27 Southern California Edison
Company and San Digeo Gas &
28 Electric Company

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VERIFICATION

SAMUEL B. CASEY, being first duly sworn, deposes and says:

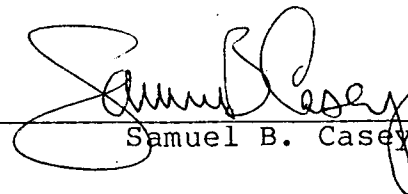
1. That he is associate of the law firm of Chickering & Gregory, San Francisco, California.

2. That he is one of Counsel for Applicants Southern California Edison Company and San Diego Gas & Electric Company (hereinafter "Applicants") in this proceeding.

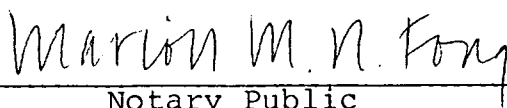
3. That he is authorized by Applicants to execute and verify the foregoing "RESPONSE AND OBJECTIONS OF APPLICANTS SOUTHERN CALIFORNIA EDISON COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY TO THE FIRST SET OF INTERROGATORIES TO APPLICANTS FROM GROUPS UNITED AGAINST RADIATION DANGER ("GUARD").

4. That he is informed and believes and upon such information and belief affirms that the foregoing "RESPONSE AND OBJECTIONS OF APPLICANTS SOUTHERN CALIFORNIA EDISON COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY TO THE FIRST SET OF INTERROGATORIES TO APPLICANTS FROM GROUPS UNITED AGAINST RADIATION DANGER ("GUARD") is true and correct.

DATED: March 10, 1981.


Samuel B. Casey

Subscribed and sworn to before
me this 10th day of March, 1981


Notary Public

In and for the City and County of
San Francisco, State of California.

My Commission expires: 11/30/84



CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of March, 1981, a copy of the RESPONSE AND OBJECTIONS OF APPLICANTS SOUTHERN CALIFORNIA EDISON COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY TO THE FIRST SET OF INTERROGATORIES TO APPLICANTS FROM GROUPS UNITED AGAINST RADIATION DANGER ("GUARD") was served upon each of the following by depositing in the United States mail, first-class, postage prepaid, addressed as follows:

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One of Counsel for Applicants
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