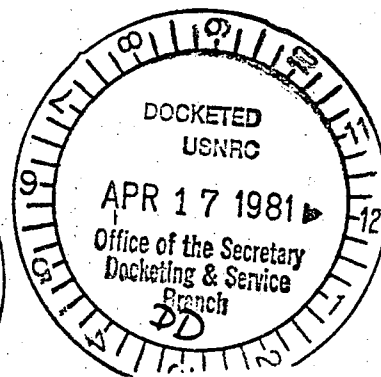
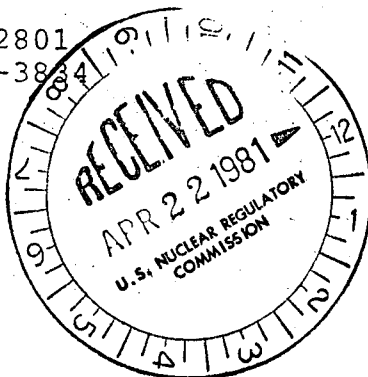


RELATED CORRESPONDENCE

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Telephone: (714) 776-3884

Attorney for GUARD



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> ,)	RESPONSES AND OBJECTIONS OF
(San Onofre Nuclear Generating)	GUARD TO APPLICANTS SOUTHERN
Station, Units 2 and 3).)	CALIFORNIA EDISON COMPANY,
)	<u>ET AL.</u> 'S SECOND SET OF
)	INTERROGATORIES TO INTERVENOR
)	GUARD

TO APPLICANTS SOUTHERN CALIFORNIA EDISON COMPANY AND SAN DIEGO GAS AND ELECTRIC COMPANY:

Pursuant to 10 C.F.R. Section 2.740b, Intervenor GUARD responds to Applicants SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY'S Second Set of Interrogatories to Intervenor GUARD, which were served by mail on February 17, 1981

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1 INTERROGATORY NO. 1:

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

8 (a) State each and every fact upon which you base
9 this contention.

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

12 (c) Identify each and every event upon which you base
13 this contention;

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

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

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

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

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

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1 RESPONSE TO INTERROGATORY NO. 1: Yes.

2 First factual basis:

3 (a) The planning efforts do not address the complex
4 problem of coordinating large scale treatment of serious
5 trauma which is complicated by radiation exposure.

6 (b) The plans themselves.

7 (c) Not based upon an event.

8 (d) John G. West, M.D., Chair of General Surgical
9 Department, St. Joseph's Hospital and President of
10 Orange County Trauma Society in Orange County.

11 (e) (i), (ii) and (iii) GUARD is in the process of ob-
12 taining witnesses and will supply this data as soon as available.

13 Second factual basis:

14 (a) The planning efforts have not been directed toward
15 providing appropriate and coordinated plans for a GE which
16 is complicated by an earthquake or other natural disaster.

17 (b) The plans themselves.

18 (c) Not based on an event.

19 (d) GUARD has insufficient information to answer
20 this interrogatory at this time.

21 (e) (i), (ii), and (iii) GUARD is in the process of
22 obtaining witnesses and will supply this data as soon as
23 available.

24 Third factual basis:

25 (a) The plans are not sufficiently detailed to provide
26 appropriate and coordinated direction and assistance for
27 special populations in the EPZ such as the frail elderly,
28 the handicapped, school children, and persons without cars

1 in the event that evacuation becomes necessary due to a GE.

2 (b) The plans themselves.

3 (c) Not based upon an event.

4 (d) 1976 Special Census, Program Planning Division
5 County of Orange, located at 10 Civic Center Drive, Santa
6 Ana.

7 (e) (i), (ii), and (iii) GUARD is in the process of
8 obtaining witnesses and will provide this data when available.

9 Fourth factual basis:

10 (a) The plans are not adequate in design or in
11 demonstrating availability of resources to accomplish
12 timely notification, evacuation and/or other protective
13 measures in the event of a GE.

14 (b) The plans themselves.

15 (c) Not based on an event.

16 (d) GUARD has insufficient information to answer this
17 interrogatory at this time.

18 (e) (i), (ii), and (iii) GUARD is in the process of
19 obtaining witnesses and will supply this data as soon as
20 available.

21 Fifth factual basis:

22 (a) The plans do not demonstrate the existence of
23 sufficient capacity to carry out radiological assessment and
24 monitoring so that information is available in a timely
25 manner to protect the public health.

26 (b) The plans themselves.

27 (c) Not based upon an event.

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1 (d) GUARD has insufficient information to answer at
2 this time.

3 (e) (i), (ii), and (iii) GUARD is in the process of
4 obtaining witnesses and will supply this data as soon as
5 available.

6 INTERROGATORY NO. 2:

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

17 (a) State each and every fact upon which you base this
18 contention;

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

21 (c) Identify each and every event upon which you base
22 this contention;

23 (d) Identify each and every person with knowledge of
24 factual basis or bases for this contention, or on whose writings,
25 opinions, or testimony you base this contention;

26 (e) Identify each and every person whom you expect
27 to call as a witness, expert or otherwise, at the hearing on
28 this contention before the Nuclear Regulatory Commission Licensing

1 Board and as to each witness so identified, please provide the
2 following information:

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

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

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

10 RESPONSE TO INTERROGATORY NO. 2:

11 Generally, yes, with some re-wording of this contention
12 to eliminate references to obsolete regulatory language.

13 First factual basis:

14 (a) Permanent and transient populations in the EPZ
15 have grown in such numbers that it is unreasonable to
16 believe that protective measures could be undertaken which
17 are adequate to protect the health of these populations,
18 particularly considering the unique geographical con-
19 straints in these areas, in the event of a GE resulting
20 in the release of dangerous levels of radiation.

21 (b) GUARD will provide census data to support this
22 contention when available.

23 (c) Not based on an event.

24 (d) GUARD is without sufficient information to answer
25 at present.

26 (e) (i), (ii), and (iii) GUARD is in the process of
27 obtaining witnesses and will provide the requested informa-
28 tion as soon as it is available.

1 Second factual basis:

2 (a) Notification and evacuation time estimates in
3 the plans submitted are currently under scrutiny by GUARD,
4 and preliminary examination calls into question the
5 effectiveness of efforts to notify and/or evacuate the
6 populations in the EPZ within sufficient time to protect
7 their health and safety in the event of a serious release
8 of radioactive matter from the plants.

9 (b) GUARD will provide supporting data of time estimate
10 studies as soon as they are available.

11 (c) Not based on an event.

12 (d) Sheldon C. Plotkin, Ph.D. & Associates:

13 Engineering Consultants

14 9911 W. Pico Blvd.

15 Suite 800

16 Los Angeles, California 90035

17 (e)(i), (ii), and (iii) GUARD is in the process of
18 obtaining witnesses in this matter and will provide this
19 information as soon as it is available.

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1 INTERROGATORY NO. 3:

2 Do you contend that the offsite emergency plans, taken
3 together, do not adequately comply with the Federal Requirements?

4 If so, as to each of the following plans:

5 (a) State Plan;

6 (b) Orange Plan;

7 (c) San Diego Plan;

8 (d) Parks Plan;

9 (e) USMC Plan;

10 (f) San Juan Capistrano Plan; and

11 (g) IAEP.

12 (1) Specify each and every section and subsection of
13 the Federal Requirements with which you contend the plan does not
14 comply and briefly state the reason why you believe that the
15 plan does not comply with the section and subsection of the
16 Federal Requirements so specified;

17 (2) State each and every fact upon which you base
18 this contention;

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

21 (4) Identify each and every event upon which you
22 base this contention;

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

26 (6) Identify each and every person whom you expect to
27 call as a witness, expert or otherwise, at the hearing on this
28 contention before the ASLB and, as to each witness so identified,

1 please provide the following information:

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

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

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

9 RESPONSE TO INTERROGATORY NO. 3: Yes.

10 GUARD objects to this question since it is unduly
11 burdensome in that it requires consideration of permutations of
12 the various interactions of the plans which would result in
13 voluminous answers beyond the ability of GUARD to
14 address.

15 (1) Without waiving its objection, GUARD answers that the
16 plans are inadequate in regard to the following:

17 (a) The State Plan is inadequate in that it was
18 written prior to the adoption of the Federal Requirements,
19 and thus does not contain any reference to the fifteen
20 minute requirement for notification capability, evacuation
21 time estimates, emergency planning zones, and other
22 equally important considerations.

23 (b) The Orange Plan estimates that it may require up
24 to one hour (p. V-6) to alert the public that a problem
25 exists. Thus, it does not meet the design objective re-
26 quiring capability to essentially complete the initial
27 notification of the public within the plume exposure pathway
28 EPZ within about fifteen minutes (10 C.F.R. Part 50, Appendix

1 E IV D). It does not provide reasonable assurance that
2 appropriate measures can or will be taken in the event of
3 an emergency (10 C.F.R. Part 50, Appendix E III).

4 The timing of evacuation has a critical effect on its
5 effectiveness as an appropriate protective measure. In the
6 event that a GE were to occur at such times as the majority
7 of family vehicles were not at home, and while school was in
8 session, adequate numbers of vehicles to evacuate the EPZ
9 populations would be unavailable. This plan does not
10 demonstrate that transportation resources could be made
11 available. Thus, the plan does not meet 10 C.F.R. § 50.47(b)
12 8, "Adequate emergency facilities and equipment to support
13 the emergency response are provided and maintained."

14 (c) The San Diego Plan, as in all of the plans, does
15 not consider the complicating effect of the occurrence of an
16 earthquake either initiating or following a nuclear accident.
17 Because earthquakes are an ever present threat in the area,
18 it is necessary to articulate plans for responding to
19 nuclear accidents complicated by earthquakes. The NRC has
20 requested the Applicant to evaluate two general cases in a
21 letter dated December 17, 1980. This letter also notes that
22 FEMA has been asked to review the adequacy of the State and
23 local capabilities during earthquakes. Without content
24 demonstrating that an accident complicated by earthquake has
25 been considered and planned for, this plan and all plans fail
26 to meet the requirements of 10 C.F.R. Part 50, Appendix E III
27 that the plans demonstrate that "reasonable assurance that
28 appropriate measures can and will be taken in the event of

1 an emergency."

2 (d) The Parks Plan does not demonstrate that the Parks
3 Department has the equipment or manpower necessary to
4 accomplish timely notification and/or evacuation of the
5 thousands of beachgoers who can be expected to be present in
6 the event that a serious accident makes it necessary to
7 evacuate rapidly. Thus, the plan fails to meet the require-
8 ment of 10 C.F.R. Part 50, Appendix E III.

9 (e) The USMC Plan is based on several assumptions
10 listed at K-3-2. One of them is that if an accident should
11 occur which poses a threat to life and health, it would be
12 such that the threat would be finished in about 72 hours.
13 This plan also shares the general lack of planning for an
14 accident complicated by an earthquake or other natural
15 disaster. By failing to address accidents of greater
16 severity than those that would permit re-entry within 72
17 hours and accidents complicated by earthquake or other
18 natural disasters, the plan fails to meet 10 C.F.R. Part 50,
19 Appendix E III in that it does not provide reasonable
20 assurance that appropriate measures can and will be taken
21 in the event of an emergency.

22 (f) The San Juan Capistrano Plan shares the common
23 feature of the other plans in that it does not provide a
24 plan for a nuclear accident which has been complicated by an
25 earthquake or other natural disaster. Thus, it fails to
26 provide reasonable assurance that appropriate measures can
27 and will be taken in the event of an emergency (10 C.F.R.
28 Part 50, Appendix E III).

1 (g) The IAEP shares the common feature of all of the
2 other plans in that it does not provide a plan for a nuclear
3 accident which has been complicated by an earthquake or
4 other natural disaster. Thus, it fails to provide reasonable
5 assurance that appropriate measures can and will be taken in
6 the event of an emergency (10 C.F.R. Part 50, Appendix E III).

7 (2) As to all of the plans above, lack of compliance with
8 the federal regulations is based upon the contents of the plans
9 themselves and upon a recognition of the severe demands which
10 implementation of an emergency response plan would place on each
11 of the jurisdictions within the planning zones.

12 Such factors as the complexity of the effort to evacuate, the
13 effects of fear upon the ability of the population to participate
14 in an orderly evacuation, the lack of availability of trauma care
15 for the seriously injured/irradiated in case of a complicated
16 accident, the inability of the several jurisdictions to give
17 timely notification and to undertake timely evacuation on behalf
18 of some populations, the consequent health effects which can
19 be expected to result from prolonged evacuation, are the facts
20 upon which these conditions are based.

21 (3) These are based on the plans themselves, except as
22 otherwise noted in previous answers (see above).

23 (4) These contentions are not based upon an event.

24 (5) GUARD is just beginning to identify persons with
25 knowledge of the factual bases of its contentions and will supply
26 their names, writings, and opinions as they are available.

27 (6) GUARD expected to call Dr. Sheldon Plotkin, Ph.D. &
28 Associates, Engineering Consultants, 9911 West Pico Blvd.,

1 Suite 800, Los Angeles, California 90035, regarding time estimates
2 for evacuation, notification, etc.

3 (i), (ii), and (iii) GUARD is in the process of
4 obtaining other witnesses and will make available information
5 regarding their testimony as soon as it is available.

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1 INTERROGATORY NO. 4:

2 Have you analyzed or do you intend to analyze any of
3 the following plans:

- 4 (a) EP;
5 (b) State Plan;
6 (c) Orange Plan;
7 (d) San Diego Plan;
8 (e) Parks Plan;
9 (f) USMC Plan;
10 (g) San Juan Capistrano Plan; or
11 (h) IAEP?

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

13 (1) Identify when such analysis was performed or
14 is expected to be performed;

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

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

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

21 RESPONSE TO INTERROGATORY NO. 4:

22 GUARD has not yet analyzed the plans according to the
23 definition supplied by Applicant in that no written reports of
24 the review of the plans have been produced.

25 GUARD does not know whether any such review and report
26 of the plans (a) through (h) will be undertaken; although, it
27 is expected that certain segments of the plans will be analyzed,
28 relating to GUARD's contentions.

1 INTERROGATORY NO. 5:

2 Do you contend that the EP, as clarified by the EP
3 Responses to NRC questions, does not comply with Federal
4 Requirements? If so,

5 (a) Specify each and every section and subsection of
6 the Federal Requirements with which you contend the EP does not
7 comply and briefly state the reasons why you believe that the
8 EP does not comply with the section and subsection of the
9 Federal Requirements so specified;

10 (b) State each and every fact upon which you base
11 this contention;

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

14 (d) Identify each and every event upon which you
15 base this contention.

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

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

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

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

27 (iii) Summarize the factual and theoretical bases
28 as well as any other grounds, for each opinion to which the

1 witness is expected to testify.

2 RESPONSE TO INTERROGATORY NO. 5:

3 Yes, GUARD contends that the EP as it integrates with
4 the other plans does not comply with Federal Requirements.

5 GUARD has not yet has sufficient time to analyze the
6 EP in this regard, especially since the plans as submitted are
7 still being revised, and GUARD believes it best to conserve its
8 resources until the plans are in a state of completion.

9 One of the most serious respects in which the EP
10 fails to comply with Federal Requirements is in its failure to
11 provide "reasonable assurance that appropriate measures can and
12 will be taken in the event of an emergency" (10 C.F.R. Part 50,
13 Appendix E III) because it has not addressed the problem of
14 planning for a nuclear accident which has been complicated by
15 an earthquake or other natural disaster.

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1 INTERROGATORY NO. 6:

2 Aside from the contentions already referred to in the
3 foregoing Interrogatories, do you contend that there are any
4 other reasons for finding that the state of onsite and offsite
5 emergency preparedness for SONGS 2 and 3 does not provide
6 reasonable assurance that adequate protective measures can and
7 will be taken in the event of a radiological emergency involving
8 SONGS 2 and 3? If so, state each such contention in reasonable
9 detail, and as to each such contention so state:

10 (a) State each and every fact upon which you base this
11 contention;

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

14 (c) Identify each and every event upon which you base
15 this contention;

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

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

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

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

27 (iii) Summarize the factual and theoretical bases
28 as well as any other grounds, for each opinion to which the

1 witness is expected to testify; and

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

6 RESPONSE TO INTERROGATORY NO. 6:

7 In addition to the contentions expressed in previous
8 interrogatories, GUARD contends that the fact that no full
9 scale drills have been held to demonstrate that the plans can
10 work is another reason for finding that emergency preparedness
11 is inadequate at this time.

12 GUARD is not aware at this time of any other reasons
13 for finding that the state of onsite and offsite emergency
14 preparedness for SONGS 2 and 3 does not provide reasonable
15 assurance that adequate protective measures can and will be taken
16 in the event of a radiological emergency involving SONGS 2 and 3.
17 However, in the event that other reasons become apparent, GUARD
18 believes that to the extent it can be shown that they would
19 affect the public health and safety, good cause would exist for
20 their consideration.

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1 INTERROGATORY NO. 7:

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

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

8 (b) Identify all Federal, State and local governmental
9 offsite assistance agencies, as well as private entities, you
10 believe should be involved in such an exercise to meet Federal
11 Requirements;

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

15 RESPONSE TO INTERROGATORY NO. 7:

16 GUARD contends that a full scale exercise should be
17 held which would test the plans, resources and response capabilities
18 of the Applicant and the local jurisdictions in dealing with
19 a GE complicated by an earthquake or other natural disaster.

20 (a) GUARD believes that before an optimal scenario can
21 be chosen, some small scale drills should be held to identify
22 the kinds of problems which the Applicant and State and local
23 agencies would have to deal with in the event of a nuclear
24 accident. Perhaps the evacuation of a small segment of one
25 of the EPZs could serve as a test of the plans' ability to
26 provide reasonable assurance that adequate protective
27 measures can and will be taken in the event of a radiological
28 emergency.

1 (b) All Federal, State, and local governmental offsite
2 assistance agencies currently designated in the plans, and
3 private entities capable of delivering health services
4 sufficient to protect the public health should be involved,
5 plus whatever supplementary vehicular and support resources
6 needed to complete the evacuation in time to demonstrate
7 that adequate protective measures can and will be taken in
8 the event of radiological emergency.

9 (c) GUARD has not yet developed the criteria against
10 which to evaluate an exercise for purposes of compliance
11 with Federal Requirements.

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1 INTERROGATORY NO. 8:

2 Have you discussed any of the following plans with
3 representatives of the offsite assistance agencies:

- 4 (a) EP;
5 (b) State Plan;
6 (c) Orange Plan;
7 (d) San Diego Plan;
8 (e) Parks Plan;
9 (f) USMC Plan;
10 (g) San Juan Capistrano Plan?

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

12 (1) Identify the person or persons with whom you
13 discussed the plan and the approximate date of each such dis-
14 cussion; and

15 (2) Identify all documents or communications pertain-
16 ing to your discussion of the plan with each person identified in
17 subparagraph (1) immediately above.

18 RESPONSE TO INTERROGATORY NO. 8:

19 (1) Yes, GUARD has discussed the plans in general with
20 the following persons:

- 21 a) George Carvalho, City Manager and Director of
22 Emergency Services, San Clemente.
23 b) Gary Brown, Police Chief, Assistant Director of
24 Emergency Services, San Clemente.
25 c) Ronald Cobman, San Clemente Fire Chief, 100 Ave.
26 Pesidio, San Clemente, California 92672.
27 d) Gary Carmichael, Emergency Planning, same address
28 as "c)" above.

- 1 e) Dick Northrup, Emergency Planning, same address as
2 "c)" above.
- 3 f) Mayor Karoline Koester, City of San Clemente, same
4 address as "c)" above.
- 5 g) Councilman Patrick Lane, same address as "c)" above.
- 6 h) Councilman Robert Limberg, same address as "c)"
7 above.
- 8 i) Councilman Allan Korsen, same address as "c)" above.
- 9 j) Councilman William Mecham, same address as "c)"
10 above..
- 11 k) Harry Saunders, City Planning Commissioner, same
12 address as "c)" above.
- 13 l) Wilma Bloom, City Planning Commissioner, same
14 address as "c)" above.
- 15 m) State of California Officer of Emergency Services,
16 Jack Kerns, Director 4167 State, Sacramento,
17 California 95814.
- 18 n) Dr. Mary Frances Reed, Nuclear Power Plant Safety
19 Unit, 2800 Meadow View Road, Sacramento, California
20 95832.
- 21 o) State of California Department of Parks and
22 Recreation, Ron McCullough, Assistant Deputy
23 Director, Region - San Diego, California.
- 24 p) Jack Stowe, Pendleton Coast Director, State Parks
25 Offices, Del Presidente, San Clemente, California
26 92672.
- 27 q) Hal Doerkson, Pendleton Coast, State Parks Offices,
28 same address as "p)" above.

- 1 r) Marion Wright, Office of Disaster Preparedness,
2 Operations Officer, County Offices, El Cajon,
3 California.
4 s) Lois Clark McCoy, Communications Officer, San Diego
5 County, Emergency Medical Services, 1375 Pacific
6 Coast Hwy., San Diego, California.
7 t) Dr. Roy Stelzner, Disaster Preparedness, Coordinator
8 for San Diego County Medical Services, same address
9 as "s)" above.
10 u) Burt Turner, Director of Emergency Services
11 Management, County of Orange Administrative Offices,
12 Santa Ana, California.
13 v) Jim Hostraft, Radiological Defense Officer, County
14 of Orange, same address as "u)" above.

15 The plans have been discussed as they presently exist
16 and as they previously existed on dates which GUARD is unable to
17 provide.

18 (2) There are no documents or communications other
19 than the plans themselves.

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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
4 by 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 RESPONSE TO INTERROGATORY NO. 9:

14 See ATTACHMENT "A", "Update of GUARD's Response to
15 First Set of Interrogatories to GUARD from Applicant".

16 DATED: April 10, 1981.

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18 Phyllis M. Gallagher
19 PHYLLIS M. GALLAGHER
20 Attorney for GUARD
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