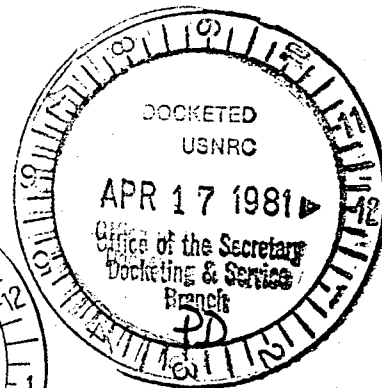
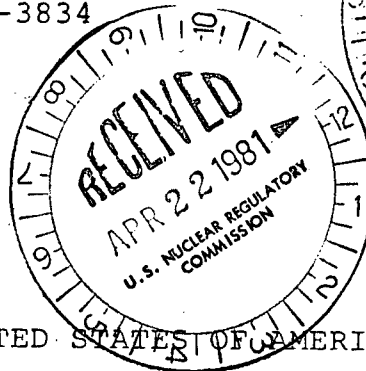


RELATED CORRESPONDENCE

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Attorney for GUARD



UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. <u>50-361 OL</u>
	)	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 THIRD SET OF INTER-
	)	<u>ROGATORIES TO INTERVENOR GUARD</u>

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 Third Set of Interrogatories to Intervenor GUARD, which were served by mail on March 2, 1981.

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1 INTERROGATORY NO. 1:

2 Do you contend that the San Clemente Plan does not  
3 adequately comply with the Federal Requirements? If so,

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

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

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

13 (d) Identify each and every event or communication  
14 upon which you base this contention;

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

20 (f) Identify each and every person whom you expect to  
21 call as a witness. expert or otherwise, at the hearing before  
22 the ASLB with respect to the San Clemente Plan and, as to each  
23 witness so identified, please provide the following information:

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

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

28 (3) Summarize the factual and theoretical bases

1 as well as any other grounds, for each opinion to which the  
2 witness is expected to testify.

3 RESPONSE TO INTERROGATORY NO. 1: Yes.

4 (a) The plan does not comply with 40 C.F.R. Part 50  
5 Appendix E III in that they do not provide sufficient information  
6 "to provide assurance of coordination among the supporting groups  
7 and with the licensee."

8 The plan as presently written fails to provide "reason-  
9 able assurance that appropriate measures can and will be taken  
10 in the event of an emergency."

11 In addition, the plan does not meet the requirements  
12 of 10 C.F.R. Section 50.47 (a) (5) (7) (8) (9) (10) (12).

13 (b) The plan is not yet completed, but is a draft  
14 plan.

15 Applicant has not shown how the plan will be implemented.

16 Specifically, the plan is deficient in regard to the  
17 capability for notification of the population, availability of  
18 public information, availability of adequate equipment for  
19 appropriate protective response, e.g., sufficient numbers of  
20 vehicles to effect evacuation, if necessary; capability of  
21 monitoring; information re the "range of protective actions"  
22 in the EPZ which are to be in place; capability of carrying out  
23 large scale evacuation; capability of instituting other protective  
24 measures; availability of medical services for contaminated  
25 individuals.

26 (c) and (d) The contention as to the draft status  
27 of the plan as well as its deficiencies on the record of the  
28 action of the San Clemente City Council, February 18, 1981 and

1 (e) Ronald Coleman, San Clemente Fire Chief, 100  
2 Ave Presidio, San Clemente, California 92672.

3 Gary Carmichael, Emergency Planning, same address.

4 Dick Northrup, Emergency Planning, same address.

5 (f) Any of the above. GUARD is in the process of  
6 obtaining witnesses and will provide names and addresses as  
7 available, as well as the substance of their testimony.

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1 INTERROGATORY NO. 2:

2 Have you analyzed or do you intend to analyze the San  
3 Clemente Plan? If so,

4 (a) Identify when such analysis was performed or is  
5 expected to be performed;

6 (b) Identify each and every person who has performed  
7 or is to perform such an analysis;

8 (c) State whether each such analysis will be voluntarily  
9 provided to Applicants without further motion to compel; and

10 (d) Identify each and every document or communication  
11 wherein such analysis may be found or is referenced.

12 REPSONSE TO INTERROGATORY NO. 2:

13 GUARD has not analyzed the plan in the sense that  
14 Applicant defines "analyze" in that no written report is in  
15 existence.

16 Current examination of the plan is in the form of notes.  
17 Analysis in the sense defined by Applicant may be done as to those  
18 parts of the plan upon which GUARD bases its contentions. This  
19 analysis will probably take place following the special pre-  
20 hearing conference on April 29, 1981.

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1 INTERROGATORY NO. 3:

2 Have you discussed the San Clemente Plan with repre-  
3 sentatives or employees of the City of San Clemente, or repre-  
4 sentatives or employees of any other offsite assistance agency?  
5 If so,

6 (a) Identify each and every person or persons with  
7 whom you discussed the plan and the approximate date of each  
8 such discussion; and

9 (b) Identify all documents or communications pertain-  
10 ing to your discussion of the plan with each person identified in  
11 subparagraph (a) immediately above.

12 RESPONSE TO INTERROGATORY NO. 3:

13 (a) Ronald Coleman, San Clemente Fire Chief, 100  
14 Ave Presidio, San Clemente, California 92672.

15 Gary Carmichael, Emergency Planning, 100 Ave Presidio,  
16 San Clemente California 92672.

17 Dick Northrup, Emergency Planning, 100 Ave Presidio,  
18 San Clemente, California 92672.

19 Mayor Karoline Koester, City of San Clemente, 100  
20 Ave Presidio, San Clemente, California 92672.

21 Councilman Patrick Lane, 100 Ave Presidio, San Clemente  
22 California 92672.

23 Councilman Robert Limberg, 100 Ave Presido, San Clemente  
24 California 92672.

25 Councilman Allan Korsen, 100 Ave Presidio, San Clemente,  
26 California 92672.

27 Councilman William Mecham, 100 Ave Presidio, San  
28 Clemente, California 92672.

1 Harry Saunders, City Planning Commissioner, 100 Ave  
2 Presidio, San Clemente, California 92672.

3 Wilma Bollm, City Planning Commissioner, 100 Ave  
4 Presidio, San Clemente, California 92672.

5 State of California Office of Emergency Services:

6 Jack Kerns, Director, 4167 State, Sacramento,  
7 California 95814; and

8 Dr. Mary Frances Reed, Nuclear Power Plant Safety  
9 Unit, 4167 State, Sacramento, California 95814 or 2800  
10 Meadowview Road, Sacramento, California 95832.

11 State of California Department of Parks and Recreation:

12 Ron McCullough, Assistant Department Director,  
13 Region, San Diego, California;

14 Jack Stowe, Pendleton Coast Director, State Parks  
15 Offices, Del Presidente, San Clemente, California 92672; and

16 Hal Doerkson, Pendleton Coast, State Parks Offices,  
17 Del Presidente, San Clemente, California 92672.

18 County of San Diego:

19 Marion Wright, Office of Disaster Preparedness,  
20 Operations Officer, County Offices, El Cajon, California;

21 Lois Clark McCoy, Communications Officer, San  
22 Diego County Emergency Medical Services, 1375 Pacific Coast  
23 Hwy., San Diego, California; and

24 Dr. Roy Stelzner, Disaster Preparedness Coordina-  
25 tor for San Diego County Emergency Medical Services, 1375  
26 Pacific Coast Hwy, San Diego, California.

27 County of Orange:

28 Burt Turner, Director of Emergency Services

1 Management, County of Orange Administrative Offices, Santa  
2 Ana, California; and

3 Jim Hartraft, Radiological Defense Officer,  
4 County of Orange Administrative Offices, Santa Ana, California.

5 (b) County plans; NUREG 0654; and OES Site Specific  
6 Study, June 1980.

7 II.

8 REQUEST FOR PRODUCTION OF DOCUMENTS.

9 Pursuant to 10 C.F.R. Section 2.741, the Applicants  
10 request GUARD to make available for inspection and copying at  
11 a mutually agreeable time and place all documents which you  
12 identified in response to these interrogatories.

13 RESPONSE:

14 All documents referred to above have been served by  
15 or upon all parties in this proceeding.

16 DATED: April 15, 1981.

17  
18 *Phyllis M. Gallagher*

19 PHYLLIS M. GALLAGHER

20 Attorney for GUARD  
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