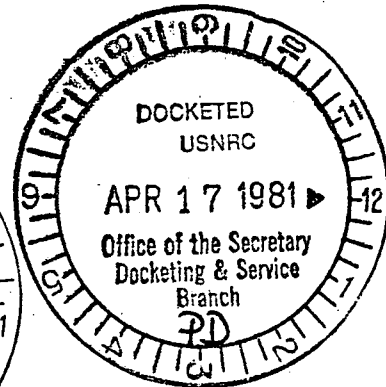
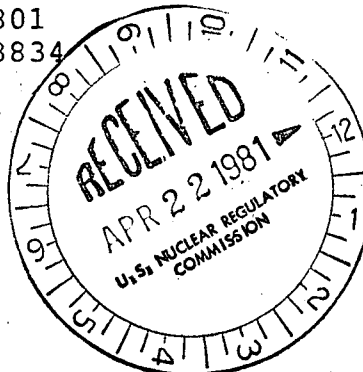


RELATED CORRESPONDENCE

4/15/81

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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

SOUTHERN CALIFORNIA
EDISON COMPANY, et al.,
(San Onofre Nuclear Generating
Station, Units 2 and 3).

Docket Nos. 50-361 OL
50-362 OL

UPDATE OF GUARD'S RESPONSE
TO FIRST SET OF INTERROGA-
TORIES TO GUARD FROM NRC

GUARD hereby updates its response to NRC Staff's First
Set of Interrogatories to GUARD pursuant to 10 C.F.R. Section
2.740(e) (1).

Interrogatory No. 1-1 a., b., c. GUARD is in the process
of developing its evidence and obtaining experts and witnesses,
and is unable to supply the information requested.

However, GUARD has spoken with the following persons who
may be called as witnesses:

1. George Carvalho, City Manager and Director of Emergency
Services, City of San Clemente.
2. Gary Brown, Police Chief, Assistant Director of
Emergency Services, City of San Clemente.

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- 1 3. Jill Swanson, Safety-Energy Coordinator, 32972 Calle
2 Perfecto, Capistrano Beach, California 92672.
- 3 4. Jen Stratton, Transportation Director, Capistrano Unified
4 School District, 32972 Calle Perfecto, Capistrano Beach,
5 California 92672.
- 6 5. Dr. Jerome Thornsley, Superintendent, Capistrano Unified
7 School District, 32972 Calle Perfecto, Capistrano Beach,
8 California 92672.
- 9 6. Dr. Sam Chicas, Assistant Superintendent, Support Ser-
10 vices, Capistrano Unified School District, 32972 Calle
11 Perfecto, Capistrano Beach, California 92672.
- 12 7. Ronald Coleman, San Clemente Fire Chief, 100 Ave Presidio,
13 San Clemente California 92672.
- 14 8. Gary Carmichael, Emergency Planning, 100 Ave Presidio,
15 San Clemente, California 92672.
- 16 9. Dick Northrup, Emergency Planning, 100 Ave Presidio,
17 San Clemente, California 92672.
- 18 10. Mayor Karoline Koester, City of San Clemente, same
19 address as "7." above.
- 20 11. Councilman Patrick Lane, same address as "7." above.
- 21 12. Councilman Robert Limberg, same address as "7." above.
- 22 13. Councilman Allan Korsen, same address as "7." above.
- 23 14. Councilman William Mecham, same address as "7." above.
- 24 15. Harry Saunders, City Planning Commissioner, same address
25 as "7." above.
- 26 16. Wilma Bloom, City Planning Commissioner, same address
27 as "7." above.
- 28 17. Jack Kerns, Director, State of California Emergency

- 1 Services, 4167 State, Sacramento, California 95814.
- 2 18. Dr. Mary Frances Reed, Nuclear Power Plant Safety Unit,
- 3 same address as "17." above.
- 4 19. Ron McCullough, State of California Department of Parks
- 5 and Recreation, Assistant Department Director, Region
- 6 San Diego, California.
- 7 20. Jack Stowe, Pendleton Coast Director, State Parks Offices,
- 8 Del Presidente, San Clemente, California 92672.
- 9 21. Hal Doerkson, Pendleton Coast, same address as "20."
- 10 above.
- ✓ 11 22. Marion Wright, County of San Diego, Office of Disaster
- 12 Preparedness, Operations Officer, County Offices, El Cajon
- 13 California.
- 14 23. Lois Clark McCoy, Communications Officer, San Diego
- 15 County Emergency Medical Services, 1375 Pacific Coast
- 16 Hwy., San Diego, California.
- 17 24. Dr. Roy Stelzner, Disaster Preparedness Coordinator
- 18 for San Diego County Emergency Medical Services, same
- 19 address as "23." above.
- 20 25. Burt Turner, Director of Emergency Services Management,
- 21 County of Orange Administrative Offices, Santa Ana,
- 22 California.
- 23 26. Jim Harcraft, Radiological Defense Officer, County of
- 24 Orange Administrative Offices, Santa Ana, California.
- 25 27. William Dawson, Director of Facilities and Services,
- 26 Capistrano Unified School District, 32972 Calle Perfecto,
- 27 Capistrano Beach, California 92672.

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1 Interrogatory No. 1-2 a., b., c., d. GUARD has had contact
2 with the State of California, Department of Parks, Orange County,
3 San Diego County, and City of San Clemente. Over the years,
4 GUARD has had spoken communications with these agencies, includ-
5 ing persons mentioned in Interrogatory No. 1-1, as well as
6 unnamed minor officials and employees of the agencies. GUARD
7 is unable to provide dates or summaries of these communications.

8 Interrogatory No. 1-3 GUARD has insufficient information to
9 respond to this Interrogatory at this time.

10 Interrogatory No. 1-4 GUARD has insufficient information to
11 respond to this Interrogatory at this time.

12 Interrogatory No. 1-5 GUARD has insufficient information to
13 respond to this Interrogatory fully at this time. However,
14 GUARD will cross-examine the person or persons who prepared the
15 Wilbur Smith Traffic Studies.

16 Interrogatory No. 1-6 GUARD has insufficient information
17 to respond to this Interrogatory at this time.

18 Interrogatory No. 1-7 a. GUARD is without sufficient information
19 to respond to this Interrogatory. GUARD believes that the burden
20 of demonstrating that sufficient funding has been allocated
21 should be carried by the Applicants and evidenced by plans which
22 can be coordinated and implemented to protect the public health
23 and safety.

24 Interrogatory No. 1-7 b. GUARD's position in response to this
25 Interrogatory is that the adequacy of staffing required to
26 develop and implement appropriate and coordinated plans is
27 tested by the quality of the plans themselves.

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1 Interrogatory No. 1-7 c. The plans as they currently exist are
2 not adequate to protect the public health and safety. They are
3 untested and could not be implemented in the event of a serious
4 accident, especially one complicated by an earthquake or other
5 complicating event.

6 Interrogatory No. 1-7 d. "Appropriate" means "suitable for its
7 purpose", which, in this context, means "capable of protecting
8 the public health and safety".

9 "Coordinated" means "working together in concert" to achieve
10 a goal, which, in this context, is the protection of the public
11 health and safety.

12 Interrogatory No. 1-7 e. The plans are still neither coordinated
13 nor appropriate. They fail to address the problem of planning
14 for an accident which has been complicated by an earthquake or
15 other complicating event. They fail to provide for adequate
16 notification, monitoring evacuation of special populations,
17 health care of injured/contaminated persons, public information,
18 control of panic, resolution of disputes among jurisdictions
19 and other issues which must be addressed if "reasonable assurance
20 that appropriate measures can and will be taken in the event of an
21 emergency" is to be required.

22 Interrogatory No. 2. This contention needs to be reworded to
23 delete reference to obsolete regulatory language. GUARD intends
24 to use this contention to scrutinize issues relating to the
25 feasibility of evacuation from the EPZ, considering the geography
26 of the area, including its roads, its beach, its hills, its mud-
27 slides, etc.

28 a., b., c., d. GUARD is in the process of obtaining

1 witnesses and experts, and will provide their names as available.
2 One person who will provide testimony for GUARD is Dr. Sheldon
3 C. Plotkin of Sheldon C. Plotkin, Ph.D. & Associates, Engineering
4 Consultants, 9911 W. Pico Blvd., Suite 800, Los Angeles,
5 California 90035.

6 Interrogatory No. 2-2 Such summaries are not yet available.
7 Interrogatory No. 2-3 Such bases and references are not yet
8 identified.

9 Interrogatory No. 2-4 See answer to Interrogatory No. 1-5.
10 Interrogatory No. 2-5 GUARD is unable to provide this information
11 as yet, but will make it available when known.

12 Interrogatory No. 2-6 GUARD believes that the agencies
13 responsible for traffic control, land use, etc., are those
14 agencies designated in the plans themselves, whose identities
15 are known to the NRC Staff. GUARD has spoken to various
16 officials of such agencies at various times, but is unable to
17 provide names or dates of communications beyond the names already
18 provided in Interrogatory No. 1-1.

19 Interrogatory No. 2-7 through 2-10 GUARD has no new data with
20 which to respond to these Interrogatories. Further, the language
21 of these Interrogatories reflects out-dated regulations. GUARD
22 anticipates a rewording of its contentions to reflect current
23 regulations.

24 Interrogatory No. 2-11 Protective measures which should be
25 considered are all those which should be employed by the
26 Applicant and/or State and local agencies to protect the public
27 health and safety, including but not limited to evacuation,
28 sheltering, decontamination, and any other measures which result in

1 dose savings and the protection of life and property of the public
2 around the plant.

3 Interrogatory 2-12 See Interrogatory No. 2.

4 DATED: April 15, 1981.

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6 Phyllis M. Gallagher

7 PHYLLIS M. GALLAGHER
8 Attorney for GUARD
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