

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

SOUTHERN CALIFORNIA EDISON COMPANY)

(San Onofre Nuclear Generating
Station, Units: 2 and 3))

Docket Nos. 50-361 O.L. 50-362 O.L.

INTERROGATORY 1

d. The geographical area involved, other than as described in the question, will be determined by the individual jurisdictions involved at and by the nature of the event. The evacuation implementation and the reception of the evacuees are identified in the Interagency Agreement and Evacuation Procedures (IAEP) and will be determined by the events at the time of the emergency.

e. The Wilbur Smith Study, pages 8 and 9, estimate the population figures for the San Onofre area both for in-place and transient (visitor) figures.

f. The times are reflected in the IAEP, page V-1.

g. The estimated length of time is indeterminant and would require a status of damage as well as the time to clear the damage and reopen the road to estimate the time to evacuate.

h. The estimated time requires further information to be answerable. Evacuation will come under each jurisdiction's Emergency Operating Center direction and would be effected as soon as practical.

k. This information is reflected in the IAEP in Section VIII.

l. The effect would again be determinate upon existing circumstances at the time of the event.

INTERROGATORY 2

It is certainly possible that such factors might support a decision not to evacuate.

INTERROGATORY 6

Local jurisdictions have established within their plans coordination actions and liaisons to facilitate cooperative decision making.

INTERROGATORY 7

Again, circumstances surrounding the nature of the event, at the time of the event, would dictate actions to be taken. It is in the realm of possibility that shelter or expedited evacuation, among other options, might be considered and/or implemented.

INTERROGATORY 8

Not called for in NUREG 0654/FEMA REP-1 Rev 1. The plans address evacuation within the Plume Exposure Pathway emergency planning zone (EPZ). While "spontaneous" evacuation was considered in planning, there is not a distinguishment regarding whether it is within or without the ten mile Plume Exposure Pathway EPZ.

INTERROGATORY 9

Not called for in NUREG 0654/FEMA REP-1 Rev 1. Planning considered the likelihood of "spontaneous" evacuation within the ten mile Plume Exposure Pathway EPZ. Evacuation estimates used full population figures for evacuation estimates to depict heaviest traffic flows. It is unknown whether consideration was given to spontaneous evacuation outside the evacuation sector or zone.

INTERROGATORY 10

Not called for in NUREG 0654/FEMA REP-1 Rev 1. No specific reference to discouragement of spontaneous evacuation is made. Some affect may be rendered through effective media releases keeping the public advised of events.

INTERROGATORY 17

c. The degree of protection from whole body and thyroid exposure in excess of the Environmental Protective Agency (EPA) Protective Action Guides (PAG's) afforded by shelters is indeterminate on a specific basis. Facilities provide differing degrees of protection based upon their structural composition, design, and age. Further, the physical position of shelters within a facility will affect total exposure. The nature of the ventilation and air flow within the facility will also have an affect on exposure.

INTERROGATORY 35

The Wilbur Smith Study considered impediments to evacuation in their determinations regarding evacuations. Planning calls for spontaneous handling of situations requiring alternative evacuation routes. Rerouting of traffic, law enforcement traffic control, debris clearance procedures, and alternative protective actions are all considerations available and identified within current planning.

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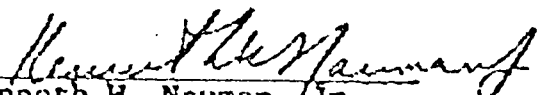
AFFIDAVIT OF Kenneth W. Nauman, Jr.

I am Project Officer, San Onofre Offsite Emergency Response Planning, Plans and Preparedness Division, Federal Emergency Management Agency Region IX.

The Responses to GUARD interrogatories served on February 20, 1981, numbered 1, 2, 6, 7, 8, 9, 10, 17, and 35 were prepared by me. The responses given are true and accurate to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 9, 1981.


Kenneth W. Nauman, Jr.