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12 UNITED STATES OF AMERICA
13
14 NUCLEAR REGULATORY COMMISSION
15
16 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

16 In the Matter of) Docket Nos. 50-361 OL
50-362 OL
17 SOUTHERN CALIFORNIA) AFFIDAVIT OF ROBERT DIETCH
EDISON COMPANY, ET AL.) IN SUPPORT OF COMMENCEMENT
18) OF HEARINGS ON EMERGENCY
(San Onofre Nuclear Generating) PLANNING CONTENTIONS SHORTLY
19 Station, Units 2 and 3) AFTER THE CONCLUSION OF
SEISMIC HEARINGS.

20
21 STATE OF CALIFORNIA,)
22) ss.
COUNTY OF LOS ANGELES)

23 I, ROBERT DIETCH, being first duly sworn, declare
24 that if called to testify in this proceeding I could
25 competently do so, as follows:

26 ///

1 1. At all pertinent times referred to herein, I
2 have been employed by Southern California Edison Company
3 ("SCE") as Vice-President, Nuclear Engineering and Operations.
4 In this capacity, I have direct management responsibility for
5 Nuclear Regulatory Commission ("NRC") licensing proceedings
6 and for the operation of the San Onofre Nuclear Generating
7 Station ("SONGS").

8 2. On May 13, 1981, a joint exercise of SONGS
9 emergency plans was conducted. Its purpose was to evaluate
10 certain onsite capabilities, as well as the offsite
11 capabilities of the state and local jurisdictions to respond
12 to a radiological emergency at SONGS with potential offsite
13 consequences. The offsite plans exercised were those of
14 Orange County, San Diego County, San Clemente, San Juan
15 Capistrano, the United States Marine Corp Base at Camp
16 Pendleton, and State Parks and Beaches. In addition to these
17 local jurisdictions, the State of Office of Emergency
18 Services ("State OES"), the State Department of Health
19 Service, Radiological Health Section, the State Department of
20 Transportation, certain units of the California Highway
21 Patrol, the Capistrano Unified School District, and the Red
22 Cross also participated. Representatives of NRC, Region V,
23 evaluated onsite actions of SCE, while the Federal Emergency
24 Management Agency ("FEMA"), Region IX, and support staff from
25 other federal agencies evaluated State and local jurisdic-
26 tional response. I personally participated in this exercise.

1 3. By memorandum dated June 3, 1981, John E.
2 Dickey, Director, Radiological Emergency Preparedness
3 Division of FEMA, reported to Brian Grimes of the NRC staff,
4 FEMA's "Interim Findings and Determination Relating to the
5 Status of State and Local Emergency Preparedness for the San
6 Onofre Nuclear Generating Station (Units 2 & 3)", hereafter
7 referred to as the "FEMA Findings and Determination". The
8 FEMA Findings and Determination were based upon the FEMA/
9 Regional Assistance Committee ("RAC") review of the currently
10 implemented offsite radiological emergency plans for SONGS,
11 and upon the FEMA, Region IX, evaluation of the joint exer-
12 cise conducted on May 13, 1981. While the FEMA Findings and
13 Determination noted that "[t]he exercise reflected a general
14 overall state of preparedness to implement general emergency
15 plans", shortfalls were noted which were said to require
16 additional efforts including training and drill efforts. The
17 FEMA Findings and Determination concluded, "that State and
18 local government radiological emergency response plans are
19 minimally adequate. However, until corrective actions have
20 been taken, the off-site capability for implementation of the
21 plans is not considered adequate." The FEMA Findings and
22 Determination also indicated that "the efforts rendered,
23 coupled with an aggressive thorough approach to training and
24 preparation (equipment, SOP's etc.) generated as a result of
25 these findings or related incentives, would create the
26 necessary capability within the very near future."

1 4. Following the issuance of the FEMA Findings and
2 Determination, representatives of SCE including myself, Mr.
3 Kenneth P. Baskin, Manager of Nuclear Engineering, Safety and
4 Licensing and Mr. Wesley C. Moody, Manager of Nuclear
5 Licensing, met with Mr. J. E. Dickey of FEMA on June 10, 1981
6 in Washington, D.C. The purpose of this meeting was to
7 discuss the FEMA Findings and Determination and to establish
8 a procedure for arranging to correct the deficiencies
9 identified by FEMA. Plans to establish an action plan for
10 correction of the deficiencies in offsite response capability
11 noted by FEMA, and a procedure for review of such program by
12 FEMA, Region IX were discussed with Mr. Dickey.

13 5. Following our meeting with Mr. Dickey, I
14 directed Mr. Baskin and other SCE representatives and
15 consultants to meet with representatives of FEMA, Region IX,
16 to discuss a proposed action plan to correct the deficiencies
17 identified in the FEMA Findings and Determination. Attending
18 this meeting on behalf of SCE were K. Baskin, D. Pilmer,
19 F. Massey, G. Allen and D. Cox. G. Beatty of NUS
20 Corporation, a consultant to SCE also attended. Attending on
21 behalf of FEMA, Region IX, were K. Nauman and R. Sandwina.
22 The purpose of this meeting, which was accomplished, was to
23 clarify the scope of action required to correct the
24 deficiencies noted in the FEMA Findings and Determination
25 concerning the capability for implementation of the offsite
26 emergency response plans.

1 6. On June 17, 1981, at San Clemente, California,
2 a meeting of representatives of the local jurisdictions
3 identified in Paragraph 2 above (with the exception of State
4 Parks and Beaches) was held. At my direction, represen-
5 tatives of SCE also attended this meeting. The SCE
6 representatives were D. Pilmer, G. Allen, S. Garry and
7 J. Wyatt. In addition, G. Re of Dames & Moore, G. Buzzelli
8 of General Atomics Corporation, and G. Beatty of NUS
9 Corporation, all consultants to SCE attended the meeting.
10 K. Nauman of FEMA, Region IX; attended a portion of this
11 meeting. The purpose of this meeting was to discuss and
12 evaluate the identified deficiencies and conclusions in the
13 FEMA Findings and Determination. A "Summary of Action
14 Required to Correct Deficiencies" was reviewed. The
15 representatives of the local jurisdictions expressed their
16 intention to proceed with necessary corrections. A formal
17 "Interjurisdictional Coordinating Committee" was established
18 to assist in the process of correcting the identified
19 deficiencies.

20 7. On June 19, 1981, a meeting was held in the
21 offices of FEMA, Region IX, in San Francisco, California
22 between representatives of FEMA (R. Sandwina, K. Nauman and
23 J. Eldridge); NRC (Dean Kunihiro, from NRC, Region V, who is
24 also NRC's RAC representative); the State OES (J. Kearns,
25 Deputy Director, J. Watkins and Dr. M. Reed); and SCE
26 (K. Baskin, F. Massey, D. Pilmer, and myself). The purpose

1 of this meeting was to review deficiencies identified in the
2 FEMA Findings and Determination, to reach agreement on an
3 action plan to correct such deficiencies, and to seek
4 appropriate involvement of State OES in the process of
5 accomplishing the action plan. At this meeting it was agreed
6 between Applicants and FEMA that the accomplishment of the
7 actions set forth in the action plan proposed by Applicants
8 would be sufficient to remedy the deficiencies noted in the
9 FEMA Findings and Determination. A true and correct copy of
10 said action plan, comprising five (5) pages and entitled
11 "CORRECTIVE ACTIONS REQUIRED TO ADDRESS FEMA DETERMINATIONS
12 OF JUNE 3, 1981," is attached as Exhibit 1 to this affidavit
13 and incorporated herein by this reference. It was understood
14 by those in attendance at this meeting that if the proposed
15 actions set forth in said action plan were properly
16 accomplished, the action plan would lead to a favorable
17 finding by FEMA concerning offsite capability to implement
18 offsite radiological emergency response plans.


19 8. The action plan attached as Exhibit 1 hereto
20 has been approved by SCE. Implementation of said plan has
21 already commenced. A copy of said action plan has also been
22 provided to the NRC Staff. With the exception of training,
23 the actions set forth in the action plan will be fully
24 completed prior to loading of the fuel at SONGS, Unit 2,
25 which is now scheduled to be ready for fuel loading on or
26 about October 1, 1981. Essential training of offsite agency

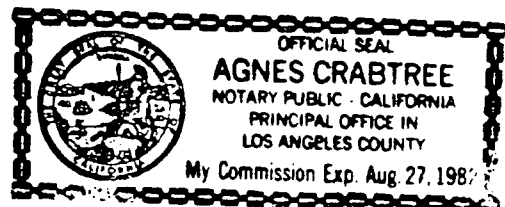
1 personnel will be completed on or before mid-December, 1981
2 depending on the scheduling of personnel to attend the
3 courses.

4 9. I have previously directed an assessment of the
5 estimated costs for each month of delay in the scheduled
6 operation of SONGS, Unit 2, based on the additional cost of
7 capital and differential fuel costs. SCE's current
8 assessment of these additional costs are over fifty (50)
9 million dollars per month. Given these extraordinary costs,
10 and SCE's commitment, in active cooperation with involved
11 offsite jurisdictions, to provide the necessary improvements
12 to offsite response capability recommended by FEMA prior to
13 fuel load of SONGS, Unit 2, in the manner described above,
14 there are compelling reasons to commence hearings on
15 emergency planning contentions shortly after conclusion of
16 seismic hearings to avoid any additional delay in the
17 scheduled operational dates of SONGS, Unit 2.

18
19 
20 Robert Dietch

21
22 Sworn to and subscribed to before
me this 29th day of June, 1981

23 
24 Notary Public, State of California,
25 County of Los Angeles.
26



CORRECTIVE ACTIONS REQUIRED TO ADDRESS FEMA DETERMINATIONS OF JUNE 3, 1981*

FEMA CONCERNS

FEMA RECOMMENDATION

RESPONSE**

FEMA Region IX Evaluation of Plans and Capabilities

"Most Critical Concern"

1. The assessment and monitoring of actual offsite radiological consequences of a radiological emergency condition through methods, systems and equipment is considered to be weak and in need of improvement to meet minimum criteria.

Develop a multi jurisdictional response capability to assure adequate coverage of plume pathway and standardized procedures which allow flexibility in response.

Continue to install the Health Physics Computer which will provide a prompt conservative assessment of the actual radiological consequences of an accident. This will be operational to a limited degree by fuel load with full operation expected by July, 1982. Further develop standard radiological monitoring procedures (SOP's) for the local jurisdictions and the Offsite Dose Assessment Center (ODAC) by August, 1981. SCE additionally will assess the local jurisdictions' current equipment against their needs and identify any deficiencies noted. SCE will provide staffing to assume a role of leadership in this function. SCE will provide training programs for personnel involved in use of the SOP's.

"Serious Concern"

2. The interim - EOF shows a lack of clear operating procedures, fragmentation of the facility, lack of management direction communications, size of the facility, and is a significant impedance to the San Clemente EOC operation.

Until the permanent EOF is completed, the interim EOF should be relocated to a single location separate from the San Clemente EOC and staffed with management, communicators and other support personnel necessary for EOF operations.

SCE will develop SOP's to make current EOF operations clearer and more manageable along the lines of the current planning arrangements. Limited physical improvements of the present facilities will be identified and accomplished.

*The schedule for these actions is identified in ENCLOSURE (2)

**As a result of a meeting between FEMA and SCE on June 15, 1981, it is SCE's understanding that the significant concerns addressed in the FEMA Region IX Evaluation of the May 13, 1981 Exercise are covered in these planned actions.

FEMA CONCERNS

"Major Concerns"

3. A need to clarify monitoring and assessment duties for both plume and ingestion pathways as they pertain to State OES, State Radiological Health and local jurisdiction.
4. Means to provide early notification and clear instructions to the public within the plume exposure pathway EPZ have not been installed or tested.
5. Adequate emergency facilities and equipment to support the emergency response have not been provided.
6. Radiological emergency response training has essentially not been provided to those who may be called upon to assist in an emergency.

FEMA RECOMMENDATION

Develop a joint standardized multi-jurisdictional response team.

Install sirens and provide warning dissemination capacity to remote areas where public address systems from surface or airborne vehicle is required.

SCE provide response equipment which was promised to the local jurisdictions, including sirens and additional communications equipment.

SCE, in conjunction with the State of California, should develop the necessary training to meet the identified needs in the local jurisdictions.

RESPONSES

(See item [1] above). SCE will develop standardized procedures for the five involved counties to obtain samples, conduct analyses, and take necessary protective actions for the ingestion pathway emergency planning zone consistent with the State Radiological Health proposed ingestion pathway procedures. Develop an integrated radiological response team to be directed by the Offsite Dose Assessment Center (ODAC) to conduct field monitoring.

SCE will proceed with current plans for siren installation. SCE will develop SOP's for public notification via the Emergency Broadcast System (EBS) and local stations identified in the plans. SCE will develop SOP's for coordination and decision making in use of sirens.

Agreements have been made between SCE and local agencies that specific equipment will be ordered by the local jurisdictions and billed to SCE. Equipment procurement has begun and is continuing. SCE will follow up with report on status of equipment received or on order. SCE will review equipment needs and status of equipment procurement activities.

(See items [1] and [3] above). SCE will develop and implement a program of training in the critical areas of radiation monitoring and assessment, communications, decision-making and coordination regarding protective actions, etc.

FEMA CONCERNS

"Sufficient Concern to Remain a Major Issue"

7. SCE has not made information available about how the public would be notified or what the public's initial actions should be in an emergency.

FEMA RECOMMENDATION

Disseminate advance public information.

RESPONSES

SCE will proceed with the public education program that includes an emergency response brochure and radiation information brochure mailer, preparation and distribution of flyers and posters, new ads, community meetings, etc.

SUMMARY OF PLANNED ACTION

SCHEDULE

Items (a) through (h):

1. Develop SOP's covering the following topics:
 - a. Operation of the Offsite Dose Assessment Center (ODAC)
 - b. Radiation surveys by field monitoring teams
 - c. Emergency Communications
 - d. Use of the siren alerting system and public notification
 - e. Coordination relating to protective actions
 - f. Acquisition, display and use of meteorological data
 - g. Operation of the EOF
 - h. Ingestion pathway monitoring
 - i. Existing SOP's covering other plan elements

1st draft - 7/15/81
Final draft - 9/1/81
Implement - 10/1/81

Item (i):

1st draft - 9/15/81
Final draft - 11/1/81
Implement - 12/1/81

2. Obtain equipment required to carry out radiation monitoring functions

- a. Survey types and quantities of equipment actually in place 7/15/81
- b. Initiate procurement of equipment shortages 8/1/81

3. Develop additional communications capability

- a. Expand interagency phone network to include CHP 7/15/81
- b. Provide speaker monitors at EOC's 7/15/81
- c. Provide teletype message system network between all principal centers 10/15/81
- d. Provide additional communication circuits 10/15/81

4. Make physical improvements to the EOF

- a. Identify possible improvements 9/1/81
- b. Obtain agreements to make improvements 9/1/81
- c. Construct improvements 10/15/81

5. Install Sirens

50% by 7/1/81
90% by 9/1/81
100% by 10/15/81

SCHEDULE

6. Accomplish training in use of new and existing procedures, facilities, and equipment.
 - a. Develop training program (long and short term) 7/15/81
 - b. Develop training material (short term program) 9/1/81
 - c. Conduct training and drills (short term program) 9/1/81 through 10/15/81
 - d. Implement long term training program 11/1/81 through 2/1/82
7. Public Information Program Ongoing,
Initial program
complete 9/1/81

1 PROOF OF SERVICE BY MAIL

2 I certify that:

3 I am employed in the City and County of San
4 Francisco, California, as one of counsel appearing for
5 Applicants Southern California Edison Company and San Diego
6 Gas & Electric Company herein.

7 I am over the age of eighteen years and not a party
8 to the within-entitled action; my business address is 600
9 Montgomery Street, 11th Floor, San Francisco, California
10 94111.

11 On June 30, 1981, I served the attached
12 "APPLICANTS' MEMORANDUM SUPPORTING COMMENCEMENT OF EMERGENCY
13 PLANNING HEARINGS SHORTLY AFTER CONCLUSION OF SEISMIC
14 HEARINGS", as well as the accompanying affidavit of Robert
15 Dietch in support thereof, in said cause, by placing a true
16 copy thereof enclosed in the United States mail, first class,
17 or where indicated by an asterisk by Express Mail, at San
18 Francisco, California, addressed as follows:

19 James L. Kelley, Chairman
20 Administrative Judge
21 Atomic Safety and Licensing
22 Board
23 U.S. Nuclear Regulatory
24 Commission
25 Washington, D.C. 20555

26 Dr. Cadet H. Hand, Jr.
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 c/o Bodega Marine Laboratory
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