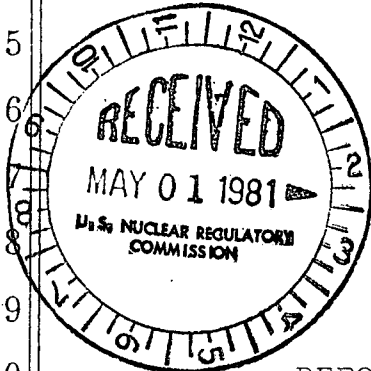
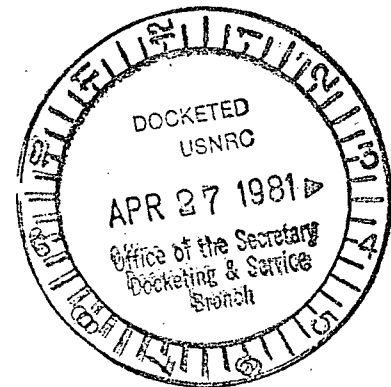


RELATED CORRESPONDENCE

4/17/81

PHYLLIS M. GALLAGHER  
1695 West Crescent Avenue  
Suite 222  
Anaheim, Ca. 92801  
Telephone: (714) 776-3834  
Attorney for Intervenor 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 Generating Station,  
Units 2 and 3).

Docket Nos. 50-361 OL  
50-362 OL

PROPOSED AGENDA ITEMS  
FOR SPECIAL PRE-HEARING  
CONFERENCE, April 29, 1981

TO THE ATOMIC SAFETY AND LICENSING BOARD AND TO ALL PARTIES:

Intervenor GUARD proposes the following matters for consideration at the Special Pre-hearing Conference to be held in San Diego on Wednesday, April 29, 1981 at 9:00 a.m. pursuant to 10 CFR 2.751a regarding Emergency Planning:

1. Discussion of further discovery, including but not limited to discovery on the drills and testing of the plans.

2. Discussion of the Proposed Rule change for expediting licensing proceedings, and its impact on the licensing hearings, if adopted.

3. The refinement of GUARD'S Contentions. GUARD

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proposes the following language:

Contention 1. Applicants have not complied with 10 C.F.R. Part 50 Appendix E and 10 C.F.R. § 50.47 regarding emergency plans because there is no reasonable assurance that the plans can be implemented, since they fail to meet the required standards for staffing response organizations, notification of response organizations and the public, communications among response organizations and between response organizations and the public, and dissemination of information to the public, all of which are necessary to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

Contention 2. Applicants have not complied with 10 C.F.R. Part 50 Appendix E and 10 C.F.R. § 50.47 regarding emergency plans since the plans fail to adequately address the problems of providing and maintaining adequate emergency facilities and equipment, developing a range of protective actions for the plume exposure pathway EPZ including measures to be taken in an accident complicated by an earthquake, arranging adequate medical services for injured contaminated individuals, and timely evacuation of various populations from the EPZ.

Respectfully submitted,

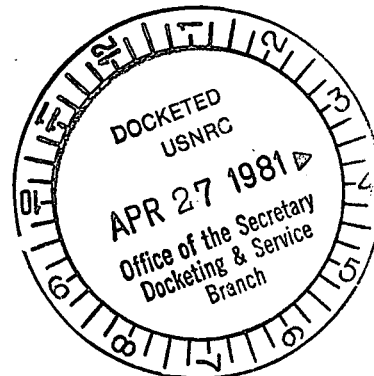
Dated April 17, 1981

*Phyllis M. Gallagher*

PHYLLIS M. GALLAGHER, Attorney  
for GUARD

1 CHARLES E. McCLUNG, JR.  
2 Attorney at Law  
3 23521 Paseo de Valencia  
Suite 308  
4 Laguna Hills, California 92653  
Telephone: (714) 768-3601

5 Attorney for Intervenor GUARD



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7  
8 UNITED STATES OF AMERICA  
9 NUCLEAR REGULATORY COMMISSION  
10 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
11

12 In the Matter of ) Docket Nos. 50-361 OL  
13 SOUTHERN CALIFORNIA EDISON ) 50-362 OL  
14 COMPANY, et. al., ) NOTICE OF APPEARANCE  
15 (San Onofre Nuclear Generating )  
16 Station, Units 2 and 3) )

17 PLEASE TAKE NOTICE that I, Charles E. McClung, Jr., will  
18 appear on behalf of GUARD, c/o Lynn Harris Hicks, 3908 Calle  
19 Ariana, San Clemente, California 92672, in the above-entitled  
20 matter.

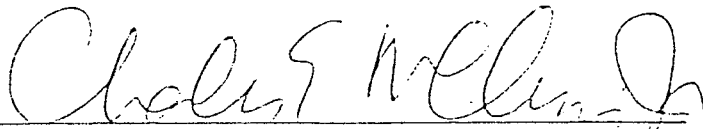
21 I am admitted to practice by the Supreme Court of California  
22 and my address and telephone number are as follows:

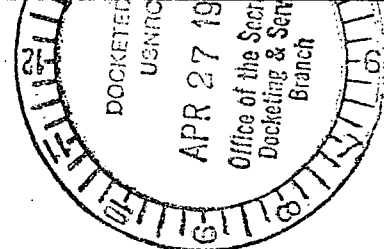
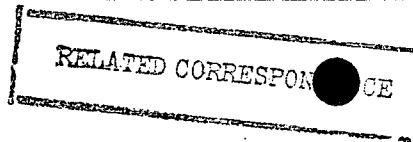
23 23521 Paseo de Valencia, Suite 308

24 Laguna Hills, California 92653

25 Telephone: (714) 768-3601

26  
27 Dated: April 16, 1981

28   
CHARLES E. McCLUNG, JR.  
Attorney for Intervenor, GUARD



CERTIFICATE OF SERVICE

1 I hereby certify that on the 17th day of April, 1981,  
2 copies of the foregoing NOTICE OF APPEARANCE of Charles E. McClung  
3 Jr., Attorney for GUARD, and of GUARD's PROPOSED AGENDA ITEMS FOR  
4 SPECIAL PRE-HEARING CONFERENCE, April 29, 1981 were served upon  
5 each of the following by depositing in the United States mail,  
6 first class postage prepaid, at Anaheim, California, addressed  
7 as follows:

8 James Kelly, Esq., Chairman	Dr. Cadet H. Hand, Member
9 Atomic Safety and Licensing Board	Atomic Safety and Licensing Board
10 U.S. Nuclear Regulatory Commission	Director, Bodega Marine Laboratory
Washington, D.C. 20555	University of California
	P.O. Box 247
11 Richard J. Wharton, Esq.	Bodega Bay, CA 94923
12 University of San Diego	
13 School of Law	Alan R. Watts, Esq.
Alcala Park	Rourke & Woodruff
14 San Diego, CA 92110	California First National Bank
	Building Suite 1020
15 David R. Piggot, Esq.	1055 North Main St.
16 Chickering & Gregory	Santa Ana, CA 92701
17 Counsel for San Diego Gas & Electric Co.,	
and Southern California Edison Company	John R. Bury, General Counsel
18 Three Embarcadero Center, 23rd Floor	Charles R. Kocher, Esq.
San Francisco, CA 92112	James A. Beoletto, Esq.
	Southern California Edison Co.
19 Docketing and Service Section	P.O. Box 800
Office of the Secretary	2244 Walnut Grove Ave.
U.S. Nuclear Regulatory Commission	Rosemead, CA 92770
Washington, D.C. 20555	
	James H. Drake, Vice President
20 Atomic Safety and Licensing Board Panel	Southern California Edison
U.S. Nuclear Regulatory Co-mission	P.O. Box 800
21 Washington, D.C. 20555	2244 Walnut Grove Avenue
	Rosemead, CA 92770
22 Mr. Lloyd von Haden	
2089 Foothill Drive	David W. Gilman
23 Vista, CA 92803	Robert G. Lacy
	San Diego Gas & Electric Company
24 Mrs. Lyn Harris Hicks	P.O. Box 1831
GUARD	San Diego, CA 92112
25 3908 Calle Ariana	
San Clemente, CA 92672	Lawrence J. Chandler, Esq.
	Office of the Executive Legal
26 Dr. Elizabeth Johnson	Director, U.S. Nuclear Regulatory
Atomic Safety and Licensing Board Panel	Commission
U.S. Nuclear Regulatory Commission	Washington, D.C. 20555
28 Washington, D.C. 20555	

1 Janice E. Kerr, Esq.  
2 J. Calvin Simpson, Esq.  
3 Lawrence Q. Garcia, Esq.  
4 California Public Utilities Commission  
5 5066 State Building  
6 San Francisco, CA 94102  
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Dated April 17, 1981

Phyllis M. Gallagher  
PHYLLIS M. GALLAGHER