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U.S. NUCLEAR REGULATORY COMMISSION

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

4/27/81

In the Matter of	Docket Nos. 50-361 OL 50-362 OL
SOUTHERN CALIFORNIA EDISON COMPANY, et al. (San Onofre Nuclear Generating Station, Units 2 and 3).	SUPPLEMENTAL RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY TO INTERVENOR FOE, ET AL.'S SIXTH SET OF INTERROGATORIES

TO: INTERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST CARSTENS, MR. AND MRS. LLOYD VON HADEN, MR. DONALD MAY, MRS. DONIS DAVEY, AND THEIR ATTORNEY OR RECORD:

Pursuant to 10 C.F.R. § 2.740b and the Memorandum and Order filed herein on April 20, 1981, Applicant Southern California Edison Company hereby further responds to "INTERVENOR, FOE ET AL. SIXTH SET OF INTERROGATORIES TO SOUTHERN CALIFORNIA

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EDISON" which were served by mail on Applicants on February 19, 1981.

INSTRUCTIONS AND DEFINITIONS

For purposes of the responses contained herein the following definitions and instructions shall apply:

(a) The term "these Interrogatories" generally refers to "INTERVENOR, FOE ET AL. SIXTH SET OF INTERROGATORIES TO SOUTHERN CALIFORNIA EDISON" which were served by mail on Applicants on February 19, 1981.

(b) The terms "FOE, et al.," "you," or "your" refers jointly to the intervenors propounding these Interrogatories: namely, Friends of the Earth, Mr. and Mrs. August Carstens, Mr. and Mrs. Lloyd Von Haden, Mr. Donald May, and Mrs. Donis Davey.

(c) The term "SONGS 2 and 3" refers to the San Onofre Nuclear Generating Station, Units 2 and 3.

(d) The term "SCE" refers to the Southern California Edison Company, the entity to whom to these Interrogatories were propounded.

(e) The term "Applicants" refers jointly to the co-owners of SONGS 2 and 3, SCE and San Diego Gas & Electric Company.

(f) The term "NRC" refers to the United States Nuclear Regulatory Commission.

(g) The term "EP" refers to the "SONGS 2 and 3 Emergency Plan, July, 1980" provided by Applicants' counsel to Intervenors' counsel on January 20, 1981, and served on all the parties hereto on February 3, 1981.

(h) The term "EP Responses to NRC Questions" refers to Applicants' submittals to the Director, Office of Nuclear Reactor Regulation, dated January 9, 1981, December 5, 1980, and November 26, 1980, pertaining to the EP, which responses were provided by Applicants' counsel to Intervenors' counsel on January 20, 1981, and were served on all the parties hereto on February 3, 1981.

(i) The term "State Plan" refers to the "State of California, Nuclear Power Plant Emergency Response Plan", as revised August, 1978, prepared by the State Office of Emergency Services and the State Department of Health Services, which is currently effective under State law; the term "Draft State Plan" refers to the "State of California, Nuclear Power Plant Emergency Response Plan", final draft March, 1981; the term "Draft Ingestion Pathway Plan" refers to the "California of Health Services, Radiologic Health Section, Nuclear Power Plant Emergency Plan - March, 1981 Draft" and related appendicies and procedures currently being developed under State law for the State of California, Department of Health Services by the Envirosphere Company; the term "San Clemente Plan" refers to "City of San Clemente, Radiological Emergency Response Plan Annex to the City's Emergency Operations Plan", adopted on February 18, 1981 and served on all parties hereto on February 23, 1981; the term "Orange Plan" refers to the "Orange County Response Plan, San Onofre Nuclear Generating Station, December, 1980", adopted on December 16, 1980, as prepared and coordinated by the Orange County Emergency Services Division of the General Service Agency; the term "San Diego Plan" refers to the "Unified San Diego

County, Nuclear Power Plant Emergency Response Plan, December, 1980", adopted on December 8, 1980, as prepared and coordinated by the Unified San Diego County Emergency Services Organization; the term "Parks Plan" refers to to the "Nuclear Power Plant Emergency Response Plan, San Onofre, San Clemente and Doheny State Park and Beach Areas, December, 1980", as prepared and coordinated by the State Department of Parks and Recreation, Pendleton Coast Area; the term "USMC Plan" refers to the "Emergency Response Plan (Marine Corps Base, Camp Pendleton, California) 1-79", as revised by Base Order P3440.1 Ch. 1 effective January 19, 1981, as prepared and coordinated by the United States Marine Corps, Camp Pendleton; the term "San Juan Capistrano Plan" refers to the "San Juan Capistrano Radiological Emergency Response Plan, San Onofre Nuclear Generating Station, December, 1980", adopted January 6, 1981, as prepared and coordinated by the City of San Juan Capistrano Public Works Department; the term "IAEP" refers to the "Interagency Agreement and Evacuation Procedure for the San Onofre Plume Exposure Pathway Emergency Planning Zone, December, 1980", which is adopted and incorporated by reference in each of the radiological emergency response plans, described above, with the exception of the State Plan. Each of the emergency response plans or procedures referred to in this paragraph, with the exception of the San Clemente Plan, the Draft State Plan, and the Draft Ingestion Pathway Plan, have been provided by Applicants' counsel to Intervenors' counsel on January 20, 1981, and were served on all the parties hereto on February 3, 1981.

(j) The term "offsite assistance agencies" refers

generally to all federal, State, and local governmental agencies with jurisdiction to respond in any manner in the event of a radiological emergency at SONGS 2 and 3; the term "local offsite assistance agencies" refers collectively to the agencies referred to in Paragraph (i) above, except the State Office of Emergency Services and the State Department of Health Services.

(k) The term "offsite emergency plans" refers collectively to the plans or procedures identified in Paragraph (i) above, with the exception of the Draft State Plan, and the Draft Ingestion Pathway Plan; the term "local offsite emergency plans" refers collectively to the plans or procedures identified in Paragraph (i) above, with the exception of the State Plan, the Draft State Plan, and the draft Ingestion Pathway Plan.

(l) The term "Federal Requirements" refers to the current NRC emergency planning regulation set forth in 10 C.F.R. §§ 50.33, 50.47, 50.54(q)(r)(s)(t) and (u); and 10 C.F.R., Part 50, Appendix E; the term "NUREG-0654" refers to NUREG-0654/FEMA-REP-1 (Rev. 1), "Criteria for the Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of the Nuclear Power Plants, November 1980".

(m) The term "major earthquake" refers to an earthquake which exceeds the "Safe Shutdown Earthquake" assigned for SONGS 2 and 3 in NUREG-0712, Safety Evaluation Report, Office of Nuclear Reactor Regulation, NRC, SONGS 2 and 3, February 6, 1981, which Applicants believe has been served on FOE, et al. by the NRC Staff.

(n) The term "Prior Response" refers to the "Response and Objections of Southern California Edison Company to

Intervenor FOE, et al.'s Sixth Set of Interrogatories" filed herein on March 11, 1981.

(o) The term "SER" refers to "NUREG-0712, Safety Evaluation Report, Office of Nuclear Reactor Regulation, NRC, Related to the Operation of San Onofre Nuclear Generating Station, Units 2 and 3, February 6, 1981."

(p) To enhance the completeness and responsiveness of its answers to these interrogatories, Applicants in response to some of these interrogatories have provided references to those portions of the documents, identified in Paragraphs (g) (h) (i) and (l) above, which Applicants believe to contain some or all of the information requested.

(q) In all instances, Applicants in response to these interrogatories have provided such relevant, unprivileged, non-confidential information which is responsive to each of these interrogatories and which has either been submitted to the NRC by or on behalf of SCE or is available from SCE files and or from the personal knowledge of SCE personnel. Specifically, the information is provided by Mr. David F. Pilmer, Supervising Engineer, SCE. The objections are asserted by Chickering & Gregory, counsel for Applicants.

RESPONSE TO INTERROGTORIES

INTERROGATORY NO. 1:

State whether any studies or investigations have been performed to determine if the facility's emergency plans are capable of functioning under conditions caused by a major earthquake.

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RESPONSE TO INTERROGATORY NO. 1:

Applicants assume the "plans" referred to in this interrogatory is the EP, and that the "studies or investigations" referred to are studies or investigations performed by or on behalf of Applicants. Based on these assumptions, Applicants answer that aside from the information contained or referenced in the EP and the EP Responses to NRC Questions and the SER, no specific studies or investigations have been performed by or on behalf of Applicant to determine if the EP is capable of functioning under conditions caused by a major earthquake. However, in response to the NRC Staff's request for information on this general topic, Applicants have undertaken an assessment of this question which has not yet been completed. Applicants further respond that arrangements are currently being developed, for implementation at the time of SONGS 2 fuel load, to assure that if, for any reason, necessary communication networks or transportation routes are disrupted during the course of a radiological emergency at SONGS 2 and 3, Applicants will be able to maintain their capability to augment onsite staff with required offsite resources and personnel, transit to and among emergency response facilities, and maintain communications with offsite assistance agencies. Specifically, these arrangements will include, but will not necessarily be limited to, the 24-hour per day dedication of two helicopters, controlled and operated by SCE, to ferry all required offsite SCE personnel and telecommunication equipment to SONGS 2 and 3, as well as to and from the offsite Emergency Operations Facility.

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INTERROGATORY NO. 2:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such investigation or study;

(b) the date or dates of such investigations and studies;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 2:

Not applicable.

INTERROGATORY NO. 3:

State whether any studies or investigations have been performed to determine the impact of a major earthquake upon the communication networks, primary and back-up, employed in applicant's emergency plan.

RESPONSE TO INTERROGATORY NO. 3:

Applicants answer that no specific studies or investigations have been performed by or on behalf of Applicants to determine the impact of a major earthquake upon the communication networks, primary and back-up, employed in the

EP. However, in response to the NRC Staff's request for information on this general topic, Applicants have undertaken an assessment of this question which has not yet been completed. Applicants further reiterate and incorporate herein the Response to Interrogatory No. 1. Applicants believe that there is reasonable assurance that the communication networks, primary and back-up, described in Section 7.4 of the EP and the figures and tables referenced therein, will not be significantly impacted by a major earthquake insofar as this system is redundant and utilizes well-designed microwave and radio facilities which are not subject to significant disruption for critical periods of time by any one major earthquake. Moreover, mobile telecommunication equipment to provide vital off-site communication capability will be available via helicopter transport or ground transportation.

INTERROGATORY NO. 4:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a

formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 4:

Not applicable.

INTERROGATORY NO. 5:

State whether any studies or investigations have been performed to determine the impact of a major earthquake upon the transportation routes employed in applicant's emergency plan.

RESPONSE TO INTERROGATORY NO. 5:

Applicants answer that no specific studies or investigations by or on behalf of Applicants have been performed to determine the impact of a major earthquake upon the transportation routes employed in the EP. However, in response to the NRC Staff's request for information on this general topic, Applicants have undertaken an assessment of this question which has not yet been completed. Applicants further reiterate and incorporate herein the Response to Interrogatory No. 1.

INTERROGATORY NO. 6:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports

presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 6:

Not applicable.

INTERROGATORY NO. 7:

State whether any studies or investigations have been performed to determine the impact of a major earthquake on the medical facilities relied on in applicant's emergency plan.

RESPONSE TO INTERROGATORY NO. 7:

Applicants answer that no specific studies or investigations by or on behalf of Applicants have been performed to determine the impact of a major earthquake on the medical facilities described in the EP.

INTERROGATORY NO. 8:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 8:

Not applicable.

INTERROGATORY NO. 9:

State whether any studies or investigations have been performed to determine evacuation time estimates incorporating consideration of local transportation disruption to [sic] earthquakes.

RESPONSE TO INTERROGATORY NO. 9:

Applicants answer that no specific studies or investigations have been performed to determine evacuation time estimates incorporating consideration of local transportation disruption due to earthquakes. However, in response to the NRC Staff's request for information on this general topic, Applicants have undertaken an assessment of this question which has not yet been completed. Applicants further respond that the evacuation time estimates study contained in Appendix E of the EP does assume various degrees of traffic impediment such as the disruption for use of either the Pacific Coast Highway or Interstate Route 5. The cause of such assumed impediments are not specified in the study, but the cause could be earthquake-related damage. (Reference: EP, Appendix E, pp. 11,23,32.)

INTERROGATORY NO. 10:

If the answer to the foregoing interrogatory is in the

affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 10:

Not applicable. See Response to Interrogatory No. 9.

INTERROGATORY NO. 11:

State whether any studies or investigations have been performed to determine the availability of resources and personnel to augment onsite staff under earthquake conditions.

RESPONSE TO INTERROGATORY NO. 11:

Applicants answer that, aside from the information in the EP and EP Responses to NRC questions, no specific studies or investigations have been performed by or on behalf of Applicants to determine the availability of resources and personnel to augment onsite staff under earthquake conditions. However, in response to the NRC Staff's request for information on this general topic, Applicants have undertaken an assessment of this

question which has not yet been completed. Applicants further reiterate and incorporate herein by this reference the Response to Interrogatory No. 1.

INTERROGATORY NO. 12:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 12:

Not applicable.

INTERROGATORY NO. 13:

State whether arrangements have been made to assure that emergency equipment (such as helicopters, bulldozers, off-road vehicles, etc.) will be dedicated for use by the plant even under competing emergency needs created by earthquakes.

RESPONSE TO INTERROGATORY NO. 13:

Applicants answer affirmatively by reiterating and

incorporating herein by this reference the Response to Interrogatory No. 1.

INTERROGATORY NO. 14:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) name and address of any person or organization with whom any such arrangement have been made;

(b) date or dates of such arrangements;

(c) whether the arrangements have been reduced to writing;

(d) in whose possession such document presently repose;

(e) whether applicants will make such documents available to intervenors to inspect and copy without the necessity of a formal motion to produce.

RESPONSE TO INTERROGATORY NO. 14:

(a) M.V. Riley, Manager, Administrative Services, SCE;

(b) January 28, 1981;

(c) Yes;

(d) SCE;

(e) No.

INTERROGATORY NO. 15:

State whether your representatives, agents, or employees have prepared any letters, telegrams, interoffice memoranda, photographs, videotape, diagrams, maps, or charts pertaining to the effect of earthquakes on emergency responses at SONGS 2 and 3.

RESPONSE TO INTERROGATORY NO. 15:

Applicants answer that SCE employees and SCE attorneys have prepared letters and interoffice memoranda pertaining to the development of a response to the letter, dated December 17, 1980, from R.L. Tedesco, NRC, to R. Dietch, SCE, on the effect of earthquakes on emergency responses at SONGS 2 and 3.

INTERROGATORY NO. 16:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) when and by whom the above-described documents were prepared, taken, produced, or drawn;

(b) where said documents, or negatives of such photographs or videotape, are now located;

(c) whether any of the said documents or negatives are presently in the possession of your attorney; and

(d) a summary of the contents of said documents and negatives.

RESPONSE TO INTERROGATORY NO. 16:

(a)

Person/Organization Preparing Document		Date
(1)	D. Cox	10/28/80
(2)	M.O. Medford/SCE	1/2/81
(3)	D.R. Pigott/Chickering & Gregory	2/13/81
(4)	H.L. Ottoson/SCE	1/8/81
(5)	H.L. Ottoson/SCE	1/12/81
(6)	D.F. Pilmer/SCE	1/13/81
(7)	M.V. Riley/SCE	1/28/81
(8)	R. M. King/SCE	2/24/81

(9)	D.F. Pilmer/SCE	no date
(10)	D.F. Pilmer/SCE	3/12/81
(11)	J.J. Wambold/SCE	3/35/81
(12)	D. Cox/SCE	4/1/81
(13)	W.C. Moody	4/1/81
(14)	D.F. Pilmer/SCE	4/22/81

(b) SCE

(c) Yes (copies)

(d) These documents generally describe the various steps being taken by SCE to respond to the above-described NRC letter, dated December 17, 1980.

INTERROGATORY NO. 17:

State whether any studies or investigations have been performed to determine the effects of a "simultaneous release" of radioactive material, as a result of damage of both units (SONGS 2 and 3) caused by a major earthquake, upon the facility's emergency plan.

RESPONSE TO INTERROGATORY NO. 17:

Applicants answer that no specific studies or investigations have been performed by or on behalf of Applicants to determine the effects upon the EP of a "simultaneous release" of radioactive material, as a result of damage to SONGS 2 and 3 caused by a major earthquake.

INTERROGATORY NO. 18:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 18:

Not applicable.

INTERROGATORY NO. 19:

State whether your representatives, agents, or employees have prepared any letters, telegrams, interoffice memoranda, data, photographs, videotape, diagrams, maps, or charts pertaining to the effects of a "simultaneous release" upon the emergency response plans of SONGS 2 and 3.

RESPONSE TO INTERROGATORY NO. 19:

No.

INTERROGATORY NO. 20:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) when and by whom the above-described documents were prepared, taken, produced, or drawn;

(b) where said documents, or negatives of such photographs or videotape, are now located;

(c) whether any of the said documents or negatives are presently in the possession of your attorney; and

(d) a summary of the contents of said documents and negatives.

RESPONSE TO INTERROGATORY NO. 20:

Not applicable.

INTERROGATORY NO. 21:

State whether any of the following jurisdictions have performed any studies or investigations to determine the impact of a major earthquake upon their emergency response plans:

(a) Orange County Department of Health

(b) San Diego County Office of Disaster Preparedness

(c) California State Office of Emergency Services

(d) City of San Clemente

(e) City of San Juan Capistrano

(f) California State Parks and Recreation Department

(g) U.S. Marine Corps, Camp Pendleton

(h) City of Oceanside

RESPONSE TO INTERROGATORY NO. 21:

Applicants are informed and believe and, on that basis, state that no specific studies or investigations to determine the impact of a major earthquake upon the radiological emergency response plans of the above-listed jurisdictions have been performed by said jurisdictions. Applicants are further informed and believe and, on that basis, state that the Federal Emergency Management Agency has been requested by NRC to review the

adequacy of State and local capabilities with respect to a radiological emergency response compromised or complicated by an earthquake.

INTERROGATORY NO. 22:

As to each of the above-named jurisdictions, if the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 22:

Not applicable.

INTERROGATORY NO. 23:

State whether any site specific studies or investigations have been performed to determine what size the plume exposure EPZ radius at SONGS 2 and 3 should be.

RESPONSE TO INTERROGATORY NO. 23:

Applicants reiterate and incorporate herein by this

reference the response to this interrogatory contained in the Prior Response. Applicants further respond that they have performed specific studies and investigations, or are in receipt of studies or investigations, which form the bases for Applicants' belief that the "extended" emergency planning zone (EPZ) and those portions of the "basic" EPZ beyond a ten mile radius of SONGS 2 and 3 which have been designated in the Draft State Plan are overly conservative and are without adequate technical, economic or social justification. These studies and investigations, among other things, demonstrate that the differences in size between the plume exposure pathway emergency planning zone (EPZ) required under the Federal Requirement and the analogous EPZ recommended by the State OES are not attributable to the study by Science Applications, Inc. (SAI), upon which FOE, et al purports to rely. In comparison with the Reactor Safety Study (Wash-1400) upon which the Federal Requirements are principally based, the SAI study generally indicates both a lower probability of occurrence of severe accidents and lower consequences for site-specific cases in California, including SONGS 2 and 3. Thus, the SAI study just indicates the conservation of the Federal Requirements for SONGS 2 and 3.

These studies and investigations also show that the criteria used by State OES for development of their EPZ recommendations were not based on the SAI study, but rather on independent subjective judgments without adequate technical, economic or social justification.

These studies and investigations finally show that

appropriate application of the data generated by SAI and their subcontractors to the criteria contained in the State OES report entitled "Emergency Planning Zones for Serious Nuclear Power Plant Accidents (November, 1980)" demonstrates these criteria are satisfied at SONGS 2 and 3 within ten miles of the site.

INTERROGATORY NO. 24:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 24:

(a)

(1) Bryce Johnson, Project Manager
Science Applications, Inc.
Mountain View, California
Consultants to State OES.

(2) Keith Woodard
Denis Bley
Richard, Lowe & Garrick
Irvine California.

Consulting Engineers for probability, accident sequence and accident consequence analyses.

(3) David Pilmer, Supervising Engineer SCE.

(4) B.T. Brothers, Project Manager Wilbur Smith Associates Evacuation Time Estimate Analysis.

(b) (1)(i) May 26, 1980
(2)(i) August 25, 1980
(ii) October 20, 1980

(3)(i) October 17, 1980
(ii) November 21, 1980
(iii) February 27, 1980

(4)(i) October 17, 1980;

(c) Yes;

(d) SCE;

(e) No.

(f) These studies and investigations, taken together, generally support the adequacy of the ten-mile plume exposure pathway EPZ established for SONGS 2 and 3 under the Federal Requirements and refute the technical justification for the criteria used by State OES to establish "basic" and "extended" emergency planning zones, as well as the particular zones recommended by State OES for SONGS 2 and 3 in the Draft State Plan.

RESPONSE TO INTERROGATORY NO. 25:

See response to this interrogatory in the Prior Response.

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INTERROGATORY NO. 26:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 26:

(a) John H. Robinson
Dames & Moore
Consultant in Environmental and
Earth Sciences

(b) February 26, 1981

(c) Yes

(d) SCE

(e) No

(f) The Dames and Moore study identifies the radionuclide ingestion pathways present within a fifty mile radius of SONGS, the likely access point to these pathways for

radionuclides, the types of radionuclides likely to be released during different types of accidents, the likely downwind dispersion and deposition of these radionuclides, and the potential doses or dose equivalents to humans as a result of the potential contamination of food supplies. All of these data, taken together, provide Applicants with a means for defining the extent to which potential radiological contamination could occur in the event of an accident, and the basis for recommending countermeasures to offsite assistance agencies in order to prevent or mitigate health effects to the population at risk.

INTERROGATORY NO. 27:

State whether any of the following jurisdictions have performed any studies or investigations to determine the size of the plume exposure EPZ radius employed in their emergency plan:

(a) Orange County Department of Health

(b) San Diego County Office of Disaster Preparedness

(c) California State Office of Emergency Services

(d) City of San Clemente

(e) City of San Juan Capistrano

(f) California State Parks and Recreation Department

(g) U.S. Marine Corps, Camp Pendleton

RESPONSE TO INTERROGATORY NO. 27:

Applicants are informed and believe and, on that basis, state that aside from the information contained in the local offsite emergency plans, the local offsite assistance agencies listed in this interrogatory have not performed any specific

studies or investigations to determine the size of the plume exposure EPZ radius employed in said plans. Applicants are further informed and believe and, on that basis, state that the plume exposure pathway EPZ of about ten miles, which is established for SONGS 2 and 3 in the local offsite emergency plans pursuant to the Federal Requirements, was decided by the involved local emergency planning officials after they had taken into consideration the specific conditions at the SONGS 2 and 3 site, including local emergency response needs and capabilities as they are affected by such conditions as demography, topography, land characteristics, access routes, and jurisdictional boundaries. With respect to section (c), Applicants respond that the State of California, Office of Emergency Services, in the Draft State Plan, relies on "A Study of Postulated Accidents at California Nuclear Power Plants, Science Applications, Inc., July, 1980." (Reference: Draft State Plan, p.6.)

INTERROGATORY NO. 28:

As to each of the above-named jurisdictions, if the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports

presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 28:

Applicants respond with respect to the State of California, Office of Emergency Services, as follows:

(a) Science Applications, Inc.;

(b) May 26, 1980 (SAI Report No. 1380-381-LJ);

(c) Yes;

(d) State of California, Office of Emergency Services;

(e) No;

(f) Applicants are informed and believe and, on that basis, state that a summary of the Science Applications, Inc. report entitled "A Study of Postulated Accidents at California Nuclear Power Plants, Final Report, Executive Summary, June 23, 1980" was prepared by Science Applications, Inc. for the State of California, Office of Emergency Services, and is currently in the possession of FOE, et al.

INTERROGATORY NO. 29:

State whether any of the following jurisdictions have performed any studies or investigations to determine the size of the ingestion exposure EPZ radius employed in their emergency plan:

(a) Orange County Department of Health

(b) San Diego County Office of Disaster Preparedness

(c) California State Office of Emergency Services

(d) City of San Clemente

(e) City of San Juan Capistrano

(f) California State Parks and Recreation Department

(g) U.S. Marine Corps, Camp Pendleton

RESPONSE TO INTERROGATORY NO. 29:

Applicants are informed and believe and, on that basis, state that aside from the information contained in the local offsite emergency plans, the local offsite assistance agencies listed in this interrogatory have not performed any specific studies or investigations to determine the size of the ingestion exposure EPZ radius employed in said plans. Applicants are further informed and believe and on that basis state the ingestion pathway EPZ of about 50 miles, which is established for SONGS 2 and 3 in the Draft Ingestion Pathway Plan, was decided by the involved state officials after they had taken into consideration the specific conditions at the SONGS 2 and 3 site, including local emergency response needs and capabilities as they are affected by such conditions as demography, topography, land characteristics, access routes, and jurisdictional boundaries.

With respect to section (c) of this interrogatory, Applicants respond that the State of California, Office of Emergency Services, has published a document entitled "Emergency Planning Zones for Serious Nuclear Power Plant Accidents, November, 1980." Section 4.3 of this document generally

describes the methodology for determining the size of the SONGS 2 and 3 ingestion pathway EPZ designated in the Draft Ingestion Pathway Plan. (Reference: Draft State Plan, p.6.)

INTERROGATORY NO. 30:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 30:

Applicants respond with respect to the State of California, Office of Emergency Services, as follows:

(a) State of California, Office of Emergency Services;

(b) November, 1980;

(c) Yes;

(d) State of California, Office of Emergency Services;

(e) No;

(f) Applicants believe that the report entitled State of California, Office of Emergency Services, "Emergency Planning Zones for Serious Nuclear Power Plant Accidents, November, 1980", Section 4.3, is currently in the possession of counsel for FOE, et al.

RESPONSES TO INTERROGATORY NOS. 31 THROUGH 63:

See responses to these interrogatories in the Prior Response.

INTERROGATORY NO. 64:

State whether any studies or investigations have been performed to determine the availability of using Radio Amateur Communications Emergency Services (HAMS) as an alternate emergency communications system.

RESPONSE TO INTERROGATORIES NO. 64:

Applicants interpret the reference in this iterrogatory to "Radio Amateur Communications Emerency Services (HAMS)" to be a reference to the Amateur Radio Emergency Service (ARES). Applicants are informed and believe and, on that basis, state that no studies on investigations have been performed to determine the availability of ARES as an alternate emergency communications system. Applicants believe that the communication systems generally described in the EP, EP Response to NRC questions, and the offsite emergency plans provide a more secure and reliable backup emergency communications capability than ARES. However, reference is made to the use of ARES to augment San Clemente radio communication at Section VI. B.6 of the San Clemente plan.

INTERROGATORY NO. 65:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and investigation and the basis for such findings.

RESPONSE TO INTERROGATORIES NO. 65:

Not applicable.

INTERROGATORY NO. 66:

State whether any studies or investigations have been performed to determine the capability and resources for field monitoring within the plume exposure EPZ.

RESPONSE TO INTERROGATORIES NO. 66:

Applicants interpret this interrogatory to refer to offsite radiation monitoring. Applicants are informed and believe and, on that basis, state that aside from the information in the EP, EP Responses to NRC Questions, and the offsite emergency plans, no specific studies or investigations have been performed to determine the capability and resources for offsite

radiation monitoring in the event of a radiological emergency at SONGS 2 and 3. Applicants are currently engineering an offsite radiation monitoring system to meet the criteria set forth in NUREG-0654, II.H.6 and II.H.7. In the interim, the offsite radiation monitoring to be conducted by Applicants is as described in Sections 6.2 and 7.2 of the EP and the Emergency Procedures referenced in Appendix C. to the EP. (Reference: EP Response to NRC Questions Nos. 432.38 and 432.47.) The offsite emergency plans also describe offsite radiation monitoring capabilities and resources. (Reference: e.g., State Plan, V.B.2.b.(1) and V.D.; Orange Plan, IV.A.2.(a)(3) and IVA.4.(b); and San Diego Plan, V.D.) Additionally, Applicants are informed and believe and, on that basis, state that federal offsite radiation monitoring assistance is available from the U.S. Department of Energy, upon State or local request, under the "National Radiological Emergency Preparedness/Response Plan for Commercial Nuclear Power Plan Accidents." (References: State Plan V.D.; 44 C.F.R. § 351.24 (45 Fed. Reg. 69907, October 22, 1980), and 45 Fed. Reg. 84910, 84915 (December 23, 1980). Applicants anticipate that the exercise now scheduled to take place on May 13, 1981 will demonstrate the existence of capability and resources to conduct offsite radiation monitoring around SONGS 2 and 3 in emergency conditions.

INTERROGATORY NO. 67:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons wre reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and investigation and the basis for such findings.

RESPONSE TO INTERROGATORIES NO. 67:

No applicable. Refer to the Response to Interrogatory No. 66.

INTERROGATORY NO. 68:

State whether any studies or investigations have been performed to determine the capability and resources for field monitoring within the ingestion exposure EPZ.

RESPONSE TO INTERROGATORY NO. 68:

Applicants are informed and believe and, on that basis, state that aside from the information in the EP, EP Responses to NRC Questions, the offsite emergency plans, and the Draft Ingestion Pathway Plan, no specific studies or investigations have been performed to determine the capability and resources for offsite radiation monitoring within the ingestion exposure EPZ established for SONGS 2 and 3 under the Federal Requirements. Applicants anticipate that the exercise now scheduled to take place on May 13, 1981 will demonstrate the existence of the capability and resources to do the type of offsite sampling and

analysis necessary to monitor the ingestion exposure EPZ established for SONGS 2 and 3 under the Federal Requirements. Applicants otherwise reiterate and incorporate herein by this reference the Response to Interrogatory Nos. 25, 26 and 66.

INTERROGATORY NO. 69:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presentely response;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and investigation and the basis for such findings.

RESPONSE TO INTERROGATORIES NO. 69:

Not applicable. Refer to the Response to Interrogatory Nos. 25 and 66. Applicants are informed and believe that all the documents referred to in the Response to Interrogatory No. 68 are in the possession of counsel for FOE, et al.

INTERROGATORY NO. 72:

State whether any studies or investigations have been performed to determine the relationship between effluent monitor

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readings and on-site and off-site exposures and contamination for various meterological conditions.

RESPONSE TO INTERROGATORIES NO. 72:

Yes.

INTERROGATORY NO. 73:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such resports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of eac study and investigation and the basis for such findings.

RESPONSE TO INTERROGATORIES NO. 73:

Applicants primarily rely on the following NRC regulatory guides and reports to determine the relationship between effluent monitor readings and on-site and off-site exposures and contamination for various meteorological conditions:

(a)(b)(c)

(i) Reg. Guide 1.109(Rev.1)

"Calculation of Annual Doses to Man from Routine

Releses of Reactor Effluents for the Purpose of Evaluating Compliance with 10 C.F.R., Part 50, Appendix 1, October, 1977."

(ii) Reg. Guide 1.111 (Rev.1)

"Methods for Estimating Atmospheric Transport and Dispersion of Gaseus Effluents in Routine Releases from Light Water Cooled Reactors, July, 1977."

(iii) NUREG-0133,

"Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants: A Guidance Manual for Users of Standard Technical Specifications, October, 1978."

(iv) Meteorology and Atomic Energy 1968, published by the U.S. Atomic Energy Commission, prepared by Air Resources Laboratories, Research Laboratories, Environmental Science Services Administration, and U.S. Department of Commerce.

(v) Reactor Safety Study - An Assessment of Accident Risks in U.S. Commercial Nuclear Power Plants (WASH-1400, NUREG-75/014).

(d) Applicants are informed and believe and on that basis state the foregoing studies are available from the National Technical Information Service or from NRC.

(e) No.

(f) These documents generally provide the technical basis and mathematical techniques for determining the relationships which are the subject of this interrogatory.

RESPONSE TO INTERROGATORIES NOs. 74 THROUGH 76:

See responses to these interrogatories in the Prior Response.

INTERROGATORY NO. 77:

State whether any of the following jurisdictions have performed studies or investigations to determine:

(a) evacuation time estimates;

(b) the impact of a major earthquake upon the evacuation plans.

1. Orange County Department of Health
2. San Diego County Office of Disaster Preparedness
3. California State Office of Emergency Services
4. City of San Clemente
5. City of San Juan Capistrano
6. California State Parks and Recreation Department
7. U.S. Marine Corps, Camp Pendleton
8. City of Oceanside

RESPONSE TO INTERROGATORIES NO. 77:

(a) Applicants are informed and believe and, on that basis state that no studies or investigations to determine evacuation time estimates have been performed by the jurisdictions listed in Sections 1, 2, 4, 5, 6, 7 or 8 of this interrogatory. It is Applicants' understanding that each of these jurisdictions rely on the evacuation time estimates in

Appendix E to the EP and the IAEP in the event of a radiological emergency requiring evacuation action. With respect to Section 3 of this interrogatory, Applicants respond affirmatively.

(b) Applicants are informed and believe and, on that basis, state that none of the jurisdictions listed in this interrogatory have performed studies or investigations to determine the impact of a major earthquake upon offsite emergency plans for evacuation of the plume exposure pathway EPZ around SONGS 2 and 3.

INTERROGATORY NO. 78:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such resports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of eac study and investigation and the basis for such findings.

RESPONSE TO INTERROGATORIES NO. 78:

Not applicable, except with respect to the Response to Interrogatory No. 77(a)(3). With respect to the Response to

Interrogatory No. 77(a)(3), Applicants are informed and believe and on that basis state:

(a) Mr. Charles Rainey, Center for Planning and Research, Palo Alto, California; under subcontract with Science Applications, Inc., La Jolla, California; prepared for State of California, Office of Emergency Services

(b) May 26, 1980.

(c) Yes.

(d) State of California, Office of Emergency Services.

(e) No.

(f) The findings of this study are reported in Section 8.4.3 of Science Applicants Inc.'s Final Report entitled "A Study of Postulated Acidents at California Power Plants, May 26, 1980", a copy of which Applicants are informed and believe is in the possession of FOE, et al.

RESPONSE TO INTERROGATORIES NOS. 79 AND 80:

See responses to these interrogatories in the Prior Response.

INTERROGATORY NO. 81:

State whether any studies or investigations have been performed to evaluate the potential for airlift evacuation.

RESPONSE TO INTERROGATORIES NO. 81:

Applicants are informed and believe and, on that basis, state that no studies or investigations have been performed to evaluate the potential for airlift evacuation of persons at risk in the event of a radiological emergency at SONGS 2 and 3 requiring evacuation action.

INTERROGATORY NO. 82:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such resports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of eac study and investigation and the basis for such findings.

RESPONSE TO INTERROGATORIES NO. 82:

Not applicable.

RESPONSES TO INTERROGATORIES NOS. 83 AND 84:

See responses to these interrogatories in the Prior Response.

INTERROGATORY NO. 85:

State:

(a) who is responsible for providing emergency workers with protective clothing, masks, and radiological monitoring equipment;

(b) how this emergency equipment is distributed to emergency workers;

(c) where this emergency equipment is stored.

RESPONSE TO INTERROGATORY NO. 85:

Applicants interpret this interrogatory to refer to both on-site and offsite emergency workers.

On-site:

(a) Applicants.

(b) By radiation protection technicians on duty.

(c) SONGS 2 and 3 Radiation Protection Office.

(Reference: EP Responses to NRC Questions, No. 432.50.)

Offsite:

(a) Each involved jurisdiction is responsible for providing its emergency wokers with protective clothing, masks, and radiological monitoring equipment, as needed. Applicants do not believe protective clothing and masks will be required by any jurisdiction except in the most extreme circumstances and only when rendering on-site support. (References: Orange Plan, IV.F; San Diego Plan, XVIII.D; San Clemente Plan, VIII.A; USMC Plan, K-3-D.)

(b) By directions of the Emergency Coordinator or his delegate for each involved jurisdiction, as required.

(c) Applicants do not know the exact location of storage for the emergency equipment available to each involved jurisdiction responding to a radiological emergency at SONGS 2 and 3. Applicants are informed and believe and on this basis state that the responsible officials in each involved jurisdiction know where such equipment is stored.

INTERROGATORY NO. 86:

State whether any exercises or drills have been performed to test the distribution of such emergency equipment.

RESPONSE TO INTERROGATORY NO. 86:

With respect to offsite assistance agencies, Applicants do not know whether any exercises or drills have been conducted to test the distribution of protective clothing, masks, and radiation monitoring equipment available for use in responding to a radiologial emergency at SONGS 2 and 3. Applicants are informed and believe and, on that basis, state that drills and exercises testing such distribution will be periodically conducted in the future as required under Federal Requirements or specified in the offsite emergency plans. (References: State Plan, VI.J.39; Orange Plan, Attachment 1; San Diego Plan, XVIII.D and E, pp. XVII-2 -- XVII-4; State Parks Plan, IX; San Clemente Plan, V.B.5.) With respect to onsite emergency equipment, Applicants check location and operability of such such equipment on a quarterly basis. Applicants otherwise reiterate and incorporate herein the Response to Interrogatory Nos. 35 and 45 contained in the Prior Response.

INTERROGATORY NO. 87:

State:

(a) who participated in such drills and exercises;

(b) when such drills and exercises have been performed;

(c) whether the results of such drills and exercises have been reduced to writing;

(d) whether these results would be made available to the intervenors for inspection and copying without a formal motion to produce; and

(e) a summary of the results of such drills and exercices.

RESPONSE TO INTERROGATORY NO. 87:

With respect to offsite assistance agencies, not applicable. An exercise involving the use of emergency equipment by the local offsite assistance agencies is scheduled to take place on May 13, 1981. With respect to Applicants, refer to the Response to Interrogatory No. 86.

RESPONSES TO INTERROGATORIES NOS. 88 THROUGH 92:

See responses to these interrogatories in the Prior Response.

INTERROGATORY NO. 93:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) the name, address, and capacity and occupation of each person making such study or investigation;

(b) the date or dates of such study and investigation;

(c) whether any reports of such person or persons were reduced to writing;

(d) in whose possession or custody such reports presently repose;

(e) whether you will make such reports available to intervenors to inspect and copy without the necessity of a formal motion to produce; and

(f) a summary of the findings of each study and investigation and the basis for such findings.

RESPONSE TO INTERROGATORY NO. 93:

Applicants will rely on the regulations and guidance described in the Response to Interrogatory No. 92 in determining maximum radiation exposure time limits for emergency workers. In addition, Applicants rely upon the work published by the National Council on Radiation Protection and Measurements in its publication entitled "NRCP Report No. 39, Basic Radiation Protection Criteria (January 15, 1971)."

RESPONSES TO INTERROGATORIES NOS. 94 THROUGH 102

See responses to these interrogatories in the Prior Response.

INTERROGATORY NO. 103:

State whether any exercises or drills have been performed to test the coordination and integration of the applicant's Public Information and Education plan with the Public Information and Education plans of the off-site agencies.

RESPONSE TO INTERROGATORY NO. 103:

Applicants are informed and believe and, on that basis, state that no exercises or drills have as yet been performed to test the coordination and integration of the Applicants' Public Information and Education program with the public information and education programs of the offsite assistance agencies. Applicants do not believe such drills or exercises are necessary given Applicants' commitment to integrate their program as much as possible with the public information and education programs of the offsite assistance agencies.

INTERROGATORY NO. 104:

If the answer to the foregoing interrogatory is in the affirmative, state:

(a) who participated in such exercises and/or drills;

(b) when such exercises and drills have been performed;

(c) whether the results of such exercises and drills have been reduced to writing;

(d) whether these results will be made available to the intervenors for inspection and copying without a formal motion to produce; and

(e) a summary of the results of such drills and exercises.

RESPONSE TO INTERROGATORY NO. 104:

Not applicable. Refer to the Response to Interrogatory No. 103.

RESPONSES TO INTERROGATORIES NOS. 105 THROUGH 121

See responses to these interrogatories in the Prior

INTERROGATORY NO. 122:

State whether the NRC (or FEMA) will require the state and local governments, and other off-site assist agencies, to consider the impacts of a major earthquake upon their emergency response plans.

RESPONSE TO INTERROGATORY NO. 122:

By Memorandum and Order filed herein on April 20, 1981, the Board shifted to the NRC Staff the burden of answering this interrogatory.

INTERROGATORY NO. 123:

If the answer to the foregoing interrogatory is in the negative, state how these emergency plans will be adequately coordinated in order to protect the public health and safety in the event of a major earthquake.

RESPONSE TO INTERROGATORY NO. 123:

Pursuant to the Memorandum and Order filed herein on April 20, 1981, Applicants will answer this interrogatory promptly upon receipt of the NRC Staff's answer to Interrogatory No. 122 above.

DAVID R. PIGOTT
SAMUEL B. CASEY
JOHN A. MENDEZ
CHICKERING & GREGORY

CHARLES R. KOCHER
JAMES A. BEOLETTO
SOUTHERN CALIFORNIA EDISON COMPANY

By _____
Samuel B. Casey
One of Counsel for Applicants
SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY

VERIFICATION

SAMUEL B. CASEY, being first duly sworn, deposes and says:

1. That he is an associate of the law firm of Chickering & Gregory, San Francisco, California.

2. The he is one of Counsel for Applicants Southern California Edison Company and San Diego Gas & Electric Company (hereafter "Applicants") in this proceeding.

3. That he is authorized by Applicants to execute and verify the foregoing "SUPPLEMENTAL RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY TO INTERVENOR'S SIXTH SET OF INTERROGATORIES" (hereinafter the "Supplemental Response").

4. That he is informed and believes and upon such information and belief affirms that the foregoing Supplemental Response is true and correct.

DATED: April 27, 1981

Samuel B. Casey

Samuel B. Casey

Subscribed and sworn to before me
this 27th day of April, 1981.

Marion M.N. Fong

Notary Public
In and for the City and County of
San Francisco, State of California.

OFFICIAL SEAL
MARION M.N. FONG
NOTARY PUBLIC — CALIFORNIA
San Francisco County
My Commission Expires Nov. 30, 1984

My Commission expires: 11/30/84

CERTIFICATE OF SERVICE

I hereby certify pursuant to 10 C.F.R. § 2.712(e)(2) that on the 27th day of April, 1981, a copy of the "SUPPLEMENTAL RESPONSE AND OBJECTIONS OF SOUTHERN CALIFORNIA EDISON COMPANY TO INTERVENOR FOE, ET AL.'S SIXTH SET OF INTERROGATORIES" was served upon each of the following by depositing in the United States mail, first-class, postage prepaid, addressed as follows:

James L. Kelley, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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SAMUEL B. CASEY
One of Counsel for Applicants
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