

COPY

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

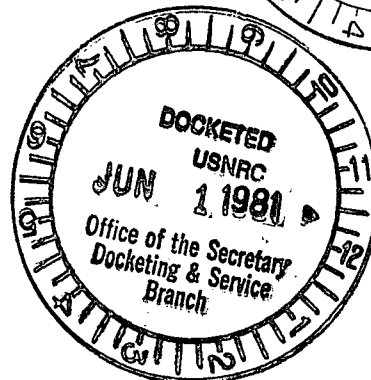
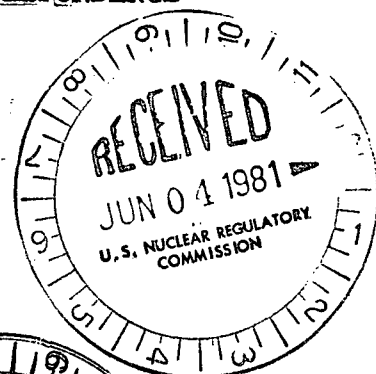
In the Matter of:

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

) Docket Nos. 50-361 OL  
) 50-362 OL  
) FURTHER 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 ATTORNEYS OF 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



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1 "INTERVENOR, FOE ET AL. SIXTH SET OF INTERROGATORIES TO  
2 SOUTHERN CALIFORNIA EDISON" which were served by mail on  
3 Applicants on February 19, 1981.

4 INSTRUCTIONS AND DEFINITIONS

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

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

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

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

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

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

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

26 ///

1                   (g) The term "EP" refers to the "SONGS 2  
2 and 3 Emergency Plan, July, 1980" provided by Applicants'  
3 counsel to Intervenor's counsel on January 20, 1981, and  
4 served on all the parties hereto on February 3, 1981; the  
5 term "Revised EP" refers to the "Emergency Plan for San  
6 Onofre Nuclear Generating Station, Units 2 and 3, April 1981"  
7 which will be served on the parties hereto on or before  
8 June 1, 1981.

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

16                   (i) The term "State Plan" refers to the  
17 "State of California, Nuclear Power Plant Emergency Response  
18 Plan", as revised August, 1978, prepared by the State Office  
19 of Emergency Services and the State Department of Health  
20 Services, which is currently effective under State law; the  
21 term "Draft State Plan" refers to the "State of California,  
22 Nuclear Power Plant Emergency Response Plan", final draft  
23 March, 1981; the term "Draft Ingestion Pathway Plan" refers  
24 to the "California of Health Services, Radiologic Health  
25 Section, Nuclear Power Plant Emergency Plan - March, 1981  
26 Draft" and related appendicies and procedures currently being

1 developed under State law for the State of California,  
2 Department of Health Services by the Envirosphere Company;  
3 the term "San Clemente Plan" refers to "City of San Clemente,  
4 Radiological Emergency Response Plan Annex to the City's  
5 Emergency Operations Plan", adopted on February 18, 1981 and  
6 served on all parties hereto on February 23, 1981; the term  
7 "Orange Plan" refers to the "Orange County Response Plan, San  
8 Onofre Nuclear Generating Station, December, 1980", adopted  
9 on December 16, 1980, as prepared and coordinated by the  
10 Orange County Emergency Services Division of the General  
11 Service Agency; the term "San Diego Plan" refers to the  
12 "Unified San Diego County, Nuclear Power Plant Emergency  
13 Response Plan, December, 1980", adpted on December 8, 1980,  
14 as prepared and coordinated by the Unified San Diego County  
15 Emergency Services Organization; the term "Parks Plan" refers  
16 to the "Nuclear Power Plant Emergency Response Plan, San  
17 Onofre, San Clemente and Doheny State Park and Beach Areas,  
18 December, 1980", as prepared and coordinated by the State  
19 Department of Parks and Recreation, Pendleton Coast Area; the  
20 term "USMC Plan" refers to the "Emergency Response Plan  
21 (Marine Corps Base, Camp Pendleton, California) 1-79", as  
22 revised by Base Order P3440.1 Ch. 1 effective January 19,  
23 1981, as prepared and coordinated by the United States Marine  
24 Corps, Camp Pendleton; the term "San Juan Capistrano Plan"  
25 refers to the "San Juan Capistrano Radiological Emergency  
26 Response Plan, San Onofre Nuclear Generating Station,

1 December, 1980", adopted January 6, 1981, as prepared and  
2 coordinated by the City of San Juan Capistrano Public Works  
3 Department; the term "IAEP" refers to the "Interagency  
4 Agreement and Evacuation Procedure for the San Onofre Plume  
5 Exposure Pathway Emergency Planning Zone, December, 1980",  
6 which is adopted and incorporated by reference in each of the  
7 radiological emergency response plans, described above, with  
8 the exception of the State Plan. Each of the emergency  
9 response plans or procedures referred to in this paragraph,  
10 with the exception of the San Clemente Plan, the Draft State  
11 Plan, and the Draft Ingestion Pathway Plan, have been  
12 provided by Applicants' counsel to Intervenors' counsel on  
13 January 20, 1981, and were served on all the parties hereto  
14 on February 3, 1981.

15 (j) The term "offsite emergency plans" refers  
16 collectively to the plans or procedures identified in  
17 Paragraph (i) above, with the exception of the Draft State  
18 Plan, and the Draft Ingestion Pathway Plan; the term "local  
19 offsite emergency plans" refers collectively to the plans or  
20 procedures identified in Paragraph (i) above, with the  
21 exception of the State Plan, the Draft State Plan, and the  
22 draft Ingestion Pathway Plan.

23 (k) The term "major earthquake" refers to an  
24 earthquake which exceeds the "Safe Shutdown Earthquake"  
25 assigned for SONGS 2 and 3 in NUREG-0712, Safety Evaluation  
26 Report, Office of Nuclear Reactor Regulation, NRC, SONGS 2

1 and 3, February 6, 1981, which Applicants believe has been  
2 served on FOE, et al. by the NRC Staff.

3 (l) The term "Prior Response" refers to the  
4 "Supplemental Response of Southern California Edison Company  
5 to Intervenor FOE, et al.'s Sixth Set of Interrogatories"  
6 filed herein on April 30, 1981.

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

14 (n) In all instances, Applicants in response  
15 to these interrogatories have provided such relevant,  
16 unprivileged, non-confidential information which is  
17 responsive to each of these interrogatories and which has  
18 either been submitted to the NRC by or on behalf of SCE or is  
19 available from SCE files and or from the personal knowledge  
20 of SCE personnel. Specifically, the information is provided  
21 by Mr. David F. Pilmer, Supervising Engineer, SCE. The  
22 response is prepared by Orrick, Herrington & Sutcliffe, A  
23 Professional Corporation, counsel for Applicants.

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1 SUPPLEMENTAL RESPONSE TO INTERROGATORIES

2 INTERROGATORY NO. 123:

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

7 RESPONSE TO INTERROGATORY NO. 123:

8 Pursuant to the Memorandum and Order filed herein  
9 on April 20, 1981, Applicants in the Prior Response stated  
10 that they would answer this interrogatory promptly upon  
11 receipt of the NRC Staff's answer to Interrogatory No. 122  
12 above.

13 At the Prehearing Conference held herein on  
14 April 29, 1981, the NRC Staff read its response to  
15 Interrogatory No. 122 into the record, as follows:

16 "MR. HOEFLING: "Interrogatory  
17 No. 122: State whether the NRC (or FEMA)  
18 will require the State and local Governments  
19 and other off-site assist agencies to  
consider the impact of a major earthquake  
upon their emergency response plans."

20 By way of a response, the Staff  
21 would note first, that FEMA does not consider  
22 itself in a position to require anything of  
23 the State and local Governments. It sees its  
24 role as an organization to assist in the  
development of response plans to provide  
guidance and counseling, and not to impose  
requirements on these State and local  
agencies in the emergency planning hearing.

25 With respect to earthquake  
26 considerations in emergency planning for San  
Onofre, on December 17th, 1980, the Staff  
directed a letter to the Applicants in this

1 case indicating its concern in this area and  
2 delineating the areas that it wished to  
examine.

3 And attached to that letter was a  
4 copy of a memorandum which the Staff prepared  
and directed to FEMA, also requesting that  
5 FEMA consider earthquake considerations in  
its review.

6 These two documents taken together  
7 define the extent to which the Staff and FEMA  
are considering earthquakes in the emergency  
8 planning review at this point.

9 FEMA has not explicitly requested  
10 State and local Governments to address  
earthquake concerns, however, FEMA is  
considering earthquake concerns in its review.

11 Copies of this letter and  
12 attachment were forwarded to the parties in  
this proceeding. The Board was not served.  
13 It is not routine for the Staff to serve the  
Board with correspondence of this nature  
14 prior to completion of its review and the  
issuance of the SER documents.

15 I have documents available which I  
16 can distribute to the Board now to assist  
them in their consideration of this question.

17 JUDGE KELLEY: Fine. Yes, this --  
18 I think the letter and memo were referenced  
in the Applicant's opposition to a Motion to  
19 Compel recently. I did want to get ahold of  
those. We had not -- I had not seen them,  
20 anyway.

21 MR. HOEFLING: That would be our  
22 response to that Interrogatory (handing  
document to Chairman Kelley)."

23 (TR. 443-444.)

24 The Applicants understand the NRC memorandum to  
25 FEMA referred to by the NRC Staff in their Response to  
26 Interrogatory No. 122 is dated November 3, 1980 and in

1     pertinent part requests FEMA to "include in its evaluation of  
2     off-site emergency plans, a qualitative evaluation of  
3     complicating factors which might be caused by earthquake for  
4     California nuclear power reactor sites. Specifically such  
5     evaluation should include the impacts on State/local  
6     emergency plans due to potential disruption of communication  
7     networks and evacuation routes." Applicants understand that  
8     the NRC Staff has requested tht FEMA's findings and  
9     determinations on State and local emergency preparedness, the  
10    joint exercise conducted May 13, 1981, and the results of the  
11    requested FEMA review of effects of earthquakes on  
12    State/local emergency plans to be provided to NRC on or about  
13    June 1, 1981.

14           Applicants have revised the EP to describe the  
15    steps being taken to protect the public health and safety in  
16    the event of an earthquake affecting SONGS 2 and 3 or the  
17    area surrounding SONGS 2 and 3. (Reference: EP, Sections  
18    5.4.1, 6.0, 6.2.7, 6.4.2, 7.5, Appendix A.) The revised EP  
19    also incorporates the EP Responses to NRC Questions. A copy  
20    of the revised EP will be served on the Atomic Safety and

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1 Licensing Board and the parties served herein on or before  
2 June 1, 1981.

3 DAVID R. PIGOTT  
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12 By SAMUEL B. CASEY  
13 Samuel B. Casey  
14 One of Counsel for Applicants  
15 SOUTHERN CALIFORNIA EDISON  
16 COMPANY and SAN DIEGO GAS  
17 & ELECTRIC COMPANY  
18  
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PROOF OF SERVICE BY MAIL

I declare that:

I am employed in the City and County of San Francisco, California.

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

On May 28, 1981, I served the attached FURTHER SUPPLEMENTAL RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY TO INTERVENOR FOE ET AL.'S SIXTH SET OF INTERROGATORIES in said cause, by placing a true copy thereof enclosed in the United States mail at San Francisco, California, addressed as follows:

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

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Administrative Judge  
c/o Bodega Marine Laboratory  
University of California  
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Mrs. Elizabeth B. Johnson  
Administrative Judge  
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