RELATED CORRESPONDENCE

10/18/79

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of	)	
	)	Docket Nos. 50-361-OL
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.	)	50-362-OL
	)	
(San Onofre Nuclear Generating Station, Units 2 and 3)	)	
	)	

INTERVENOR, FOE ET AL
INTERROGATORIES TO SOUTHERN CALIFORNIA EDISON

Intervenors Friends of the Earth, et al, requests that the Southern California Edison Company answer under oath, pursuant to 10 C.F.R. 2.7406, the following interrogatories within 14 days of service thereof. In answering these interrogatories, you are required to furnish such information as is available to you, including information in the possession of your attorneys and investigators for your attorneys.

1. Have you analyzed the reports concerning ground motion potentials at the Vallecitos Nuclear Center that have been published by the Nuclear Regulatory Commission, the USGS, Friends of the Earth, and licensee consultants since September 1977?

If so, would you state the results of such analysis.

2. Do you agree that the USGS and the NRC Geosciences branch have predicted ground motion in excess of 1.0g and surface off-set of 3.5 meters for a fault that is short, but structurally related to a branch of the San Andreas?

If you do not agree, set forth the basis for such disagreement.

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3. Have you analyzed the seismic and geologic reports regarding the Auburn Dam, the Humboldt Bay reactor, and the Diablo Canyon Reactors referred to by Burt Slemmons on September 13, 1979, the meeting with the NRC and USGS in Menlo Park?

If so, state the results of your analysis.

4. What was the maximum possible EQ that was predicted for the Newport Inglewood fault zone by the consultant reports prepared for Southern California Edison in regards to the Bolsa Island Floating Nuclear Reactor that was planned to be cited offshore from Newport Beach?

5. Would you agree with the statement: "Off-shore subsurface studies of the Capistrano embayment indicate that several significant faults may underly the general vicinity of the San Onofre site?"

If you do not agree with the above statement please indicate which part of the statement you disagree with and the basis for said disagreement.

6. Do you agree that there are many short faults in the Capistrano embayment and that these faults are typical of a wrench tectonic system?

If you do not agree with this statement, state that which you do not agree and the basis for your disagreement.

7. Do you agree that there is micro-siesmic activity in the Capistrano embayment and that this indicates that it is part of an active tectonic system?

If you do not agree, please state that which you do not agree and the basis for your disagreement.

8. Do you, at the present time, have an on-going microseismic survey of the Capistrano embayment?

9. Did you at any time conduct a microseismic survey of the Capistrano embayment?

If so, give a summary of the results of that survey.

10. Why did you discontinue the microseismic survey of the Capistrano embayment?

11. What ground motion measurements were recorded on the Applicants' seismic instruments during the following earthquakes:

a. The 1969 Laguna Beach Quake.
b. The earthquake which occurred on January 2, 1975.
c. The Los Angeles earthquake which occurred in February of 1971.

12. State the make and model of all instruments used at San Onofre Nuclear Generating Station to measure ground motion.

13. Are the instruments used to measure ground motion at San Onofre considered the best that the state of the art has to offer?

14. Do the instruments used to measure ground motion at San Onofre have automatic gain control?

15. Do you agree that the recently discovered unmapped faults in the area of the Cristianitos and Mission Viejo faults are part of an active wrench tectonic system?

If you do not agree to this statement please state that with which you do not agree and the basis for your disagreement.

16. Do you agree that the Mission Viejo fault could be a branch of the Cristianitos fault?

If you do not agree with this statement please state that with which you disagree and the basis for your disagreement.

17. Do you agree that the Cristianitos fault has multiple branches with subparallel and en echelon strands?

If you do not agree to this statement please state that with which you do not agree and the basis for your disagreement.

18. Do you agree that Faults E and F are branches of the Cristianitos fault?

If you do not agree with this statement please state that with which you do not agree and the basis for your disagreement.

19. Do you agree that the Cristianitos fault is part of an active wrench tectonic system?

If you do not agree with this statement please state that with which you do not agree and the basis for your disagreement.

20. Is it possible that the Cristianitos fault has other sub-parallel branches that have not yet been mapped?

21. What data do you have to disprove the hypothesis that the type A features observed in the site of excavation beneath Unit 2 are evidence of a branch of the Cristianitos fault?

22. What are the northerly and southerly points of termination of the four strands of the type A shear zones in the plant site?

23. What data do you have to disprove the hypothesis that the shear zones observed in the quarry and sea cliff approximately 1.7 miles northwest of the site are evidence of another branch of the Cristianitos fault?

24. What evidence do you have to disprove the hypothesis that because San Onofre Nuclear Generating Station are underlain by conjugate sets of fractures and shear joints, and because these features are more exposed by excavations, that the structures and ground surface may experience greater seismic shaking effects than when they were still buried?

25. Has any study been made of those fractures known as feature A, feature B, feature C and feature D which relates them to potential rupture due to seismic shaking?

If so, please give a summary of the result of that study.

26. Do you agree that the faults to the east of the Cristianitos fault, but west of the San Andreas fault are features of an active wrench tectonic system?

27. What evidence do you have to disprove the hypothesis that the Cristianitos Fault and 3 of its branches are structurally related to the Off-shore Zone of Deformation as subparallel branches or splays that branched off from the main fault zone?

28. Have any reports or analysis been prepared regarding the structural relationships between the Cristianitos and the O.Z.D. as evidenced in the map produced by Woodward-Clyde Consultants and submitted with the June 1979 report as figure D-1? If such reports or analysis have been prepared, please send a copy along with the answers to these interrogatories.

29. What evidence do you have to disprove the hypothesis that an earthquake offshore from SONGS with its epicenter several km south of the reactors and south of the point at which the Cristianitos and its branches intersect with the Offshore Zone of Deformation could cause rupture propagation directed towards the branches of the Cristianitos Fault and could cause amplification of ground motions on the shoreline where the Cristianitos goes out to sea?

30. Have you or your consultants ever analyzed the potential ground motions that would result from directivity of seismic waves from the Offshore Zone of Deformation lessor motion onto the Christianitos Fault Zone?

If so, please submit a summary of said analysis.

31. Have you or your consultants ever analyzed the ground motions that would result at the site from focusing effects (as described by

hearings) that could effect the Cristianitos Fault or its branches during an offshore event on the Off-shore Zone of Deformation?

If the answer to the above question is yes, please submit the results of such analysis.

32. What evidence do you have to disprove the hypothesis that the Cristianitos fault is a potentially active and capable fault?

33. What evidence do you have to disprove the theory that the Rose Canyon Fault Zone includes the San Ysidro Fault, and is structurally related to the Vallecitos Fault and the San Miguel Fault in Baja?

34. What evidence do you have to disprove the hypothesis that the San Miguel fault is structurally related to the Plate Boundary System or Transform Zone in the Gulf of California?

35. What research reports have you analyzed concerning the active fault systems and historic seismicity in Northern Baja California?

36. Have the applicants or their consultants analyzed any of the reports listed in the enclosed "schedule of speakers" from the recent symposium on the San Andreas Fault System sponsored jointly by the States of California and Bäja California?

37. What evidence do the applicants have to disprove the hypothesis that the Off-shore Zone of Deformation is one continuous tectonic system including the Newport-Inglewood-Rose Canyon-San Miguel segments?

38. How would the added length of this active tectonic zone increase the potential magnitude of a postulated maximum earthquake?

39. What evidence do the applicants have to disprove the hypothesis that the Newport-Inglewood-Rose Canyon-San Miguel fault zone could generate an earthquake of M8 or larger because of its structural relationship to the San Andreas System and the transform Plate Boundary tectonic of the Gulf of California?

40. Do you agree that the faulting patterns around SONGS are typical of faults in a wrench tectonics system common to the Southern California Coastal Region?

If you do not agree, state the basis for your disagreement.

41. Has the applicant analyzed the following reports on Seismic Gaps:

a. "Source of Seismic Gap--Rupture Propagation on Plate Boundary" June 1978, MIT, Proceedings of the 5th, U.S. Council on Earthquake Engineering Research, by Akai.

b. "Seismic Gaps and Plate Tectonics: Seismic Potential for Major Plate Boundaries" by McCann, Nishenko, Sykes, and Krause. Presented at the GSA Annual Conference in S.F. November 1978.

42. What evidence do the applicants have to disprove the hypothesis that the Cristianitos Fault and its branches are part of a seismic gap?

43. If either the Off-shore Zone of Deformation or the Cristianitos Fault were in a seismic gap, what do you estimate would be the recurrence interval?

44. What research have you done on the basement rocks beneath the Off-shore Zone of Deformation to determine if there is one continuous fault at that depth?

45. How deep have your refraction and reflection techniques measured the fractures?

46. What evidences of thrust faulting have been observed onshore and offshore?

47. Have you considered the possibility of thrust faulting on the Offshore Zone of Deformation?

48. What peak ground acceleration at SONGS would you predict from the maximum possible EQ due to thrust faulting on the Offshore Zone of Deformation?

49. Would you consider thrust faulting unusual or typical of active wrench tectonic systems with conjugate faulting?

50. Do you agree that microseismicity can indicate the presence of active faults?

If you disagree please state the basis for your disagreement.

51. Do you agree that accumulated stress on major faults can be transferred to secondary faults or to en echelon strands or to branches?

52. How wide do you calculate the plate boundary system to be in Southern California?

53. Do you agree that in a wrench tectonic model there is torquing on the structural blocks?

If you do not agree, state the basis of your disagreement.

54. Do you agree that wrench tectonic systems are characterized by en echelon and subparallel faulting, and plastic deformations?

55. Do you think that faulting at great depths on a plate boundary would necessarily cause surface rupture?

56. Do you have any data or evidence that would contradict the hypothesis that a single continuous fault in the basement rocks of the Newport-Inglewood Rose Canyon Fault Zone would not necessarily cause surface faulting in the ductile sedimentary deposits near the

surface?

If so, please provide us with such data and evidence.

57. Do you have any evidence that there is not one continuous fault in the basement rocks along the Newport-Inglewood-Rose Canyon Zone?

58. Do you agree with the statement, "little strong motion data is available at distances of less than 10 km from the rupture surface. Hence, estimates of ground motion at San Onofre from a major earthquake along the hypothesized zone of deformation approximately eight km offshore from the site would have significant uncertainty when based on empirical data"?

If not, state the basis for your disagreement.

59. Do you believe that you have adequate data to predict future seismicity on the Off-shore Zone of Deformation by analyzing historic records?

60. Describe all vertical offsets or scraps that have been observed offshore from SONGS within a 20 mile radius.

61. How wide do you consider the offshore continental borderlands zone of deformation to be?

62. How far would you estimate to be the extent of ground strains and land deformations associated with the San Andreas Fault System?

63. Have you researched the reports referred to by Dr. Wayne Thatcher of the USGS speaking at the opening session of the American Geophysical Union's annual meeting in December 1977.

64. What evidence do you have to disprove the hypothesis that faults parallel to the San Andreas Fault, such as the San Jacinto, Elsinore and Newport-Inglewood, absorb strain and stress from the seismic nature of the plate boundary?

65. What is the angle and dip of the Offshore Zone of Deformation near San Onofre?

66. How deep would you estimate to be the hypocenter of a postulated earthquake on the Offshore Zone of Deformation?

67. Explain your analysis of the relationships between the hypocenter, epicenter, surface ruptures, and peak ground accelerations in the San Fernando earthquake?

68. Have you or your consultants predicted ground accelerations from an earthquake on the Offshore Zone of Deformation with a magnitude of M7.0?

If so, what is said prediction?

69. Have you or your consultants predicted ground accelerations from an earthquake on the Offshore Zone of Deformation with a magnitude of M7.5?

If so, what is said prediction?

70. Have you or your consultants predicted ground accelerations from an earthquake on the Offshore Zone of Deformation with a magnitude of M8.0?

If so, what is said prediction?

71. Have you or your consultants predicted ground accelerations from an earthquake on the Offshore Zone of Deformation with a magnitude of M8.5?

If so, what is said prediction?

72. What is the maximum magnitude earthquake that you predict could occur on the Cristianitos Fault?

73. For the maximum credible earthquake on the Cristianitos Fault what would be the expected ground motion at SONGS?

74. What do you predict to be the peak ground acceleration at SONGS from the maximum credible earthquake on the Cristianitos?

75. Please supply us with your data from the microearthquake survey of the Capistrano Embayment.

76. Do you agree that it is possible that a rupture propagating on the Off-shore Zone of Deformation could be oriented so as to focus energy at the location of the Nuclear Generating Station 2 and 3?

77. Considering the maps referred to in question #28, 82 and 83 , which branch of the Off-shore Zone of Deformation do you believe connects with the Cristianitos?

78. Do you have any plans to conduct a microearthquake survey of the Cristianitos Fault Zone?

If not, why not?

79. Has the applicant done a class 9 Accident Analysis for SONGS 1?

80. How many people live within an 80 mile radius of SONGS 1, 2, and 3?

81. Has the applicant done a class 9 Accident Analysis for SONGS 2 and 3?

82. What is the projected population within 20 miles of SONGS during the predicted operating lifetime of SONGS 2 and 3?

83. Have you had any consultants do reports or analyses of the apparent structural relationships between the Cristianitos and the O.Z.D. as evidenced in the map produced by the US Department of the Interior, Bureau of Land Management, Pacific Outer Continental Shelf Office, Proposed OCS Outer Continental Shelf Sale 48 ES, Southern California Offshore Area.

84. Have you had any consultants do reports or analyses of the apparent structural relationships between the Cristianitos and the O.Z.D. as evidenced in the map produced by the CDMG (Official State Geology Map).

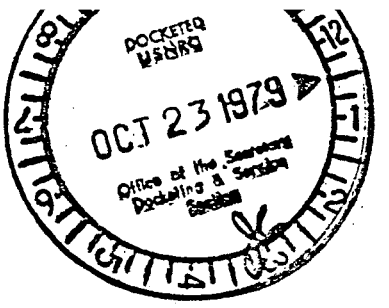
Respectfully Submitted,

Richard J. Wharton

RICHARD J. WHARTON
Attorney for Intervenors
Friends of the Earth

Dated at San Diego, California
this 18th day of October, 1979

RELATED CORRESPONDENCE



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
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SOUTHERN CALIFORNIA EDISON COMPANY, ET AL	)	Docket Nos. 50-361 OL 50-362 OL
	)	
	)	
(San Onofre Nuclear Generating Station, Units 2 and 3)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "INTERVENORS FRIENDS OF THE EARTH, ET AL INTERROGATORIES TO SOUTHERN CALIFORNIA EDISON COMPANY, ET AL" have been served on the following by deposit in the United States mail, first class, this 18th day of October, 1979:

Frederic J. Coufal, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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James F. Davis
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Division Headquarters
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Richard J. Wharton

RICHARD J. WHARTON
Attorney for Intervenors FOE ET AL

Wednesday, September 5, 1979 - Theme I: Scientific Research on the San Andreas Fault System

10:00 a.m. - Dr. Alfonso Reyes, Centro De Investigacion Cientifica y Educacion Superior De Ensenada.
"Scientific Programs in the Northern Region of Baja California"

10:30 a.m. - Dr. James F. Davis, California Division of Mines and Geology.
"Division Programs and Activities in the International Border Region."

11:00 a.m. - Dr. Francisco Suarez, Rolando Armijo, Gordon Gastil, Centro De Investigaciones Cientifica y Educacion Superior De Ensenada.
"Geological Knowledge of Seismically Active Structures in the Principal Fault Scarp Zone of the Gulf of California:

11:30 a.m. - Dr. Robert V. Sharp, U.S. Geological Survey
"Recent Geological Research on the Imperial Fault"

12:00 p.m. - Ing. Guillermo P. Salas, Consejo De Recursos Minerales
"Consequences of Faulting in Relation to the San Andreas Fault"

12:30 p.m. - Dr. Jerry Eaton, U.S. Geological Survey
"Seismic Studies on the San Andreas Fault System in Central California"

1:00 p.m. - Dr. Alfonso Reyes, J. Gonzales & J. Soares, Centro De Investigacion Cientifia y Educacion Superior De Ensenada.
"Seismic Studies in Baja California"

1:30 p.m. - Dr. James N. Brune, Scripps Institue of Oceanography
"Seismicity, Tectonics & Seismic Hazard in the International Border Region"

2:00 p.m. - Lunch Break

4:00 p.m. Dr. Bernard Colette, Instituto de Geologia, U.N.A.M.
"Damages from Quaternary Activity in the Extreme Southern Portion of the San Andreas System"

SIMPOSIUM

LOS ASENTAMIENTOS HUMANOS EN LA FALLA DE SAN ANDRES

THE HUMAN SETTLEMENTS ON THE SAN ANDREAS FAULT

INSTITUTO TECNOLOGICO REGIONAL DE TIJUANA
Calzada del Tecnológico S/N B.C.N.
Telefono: Tijuana, B.C. (903) 383-2722 ☐ Sacramento, CA (916) 322-4917 ☐ Mexico, D.F. 271-3119

4:30 p.m. - Dr. Jack Evernden, U.S. Geological Survey
"Calculation of Intensities for Southern California Earthquakes"

5:00 p.m. - Dr. Valentina Sumin, Francisco Nunez & Lutaro Ponec, Instituto de Geofisica, U.N.A.M.
"Application of the Morphostructural Analysis in Seismic Prognosis."

5:30 p.m. - Mr. John Lower, California Institute of Technology
"Seismic Instrumentation in Southern California: Present and Future."

6:00 p.m. - M. C. Carlos Duarte y Mauro Medina, Centro De Investigacion Cientifica y Education Superior De Ensenada
"Digital Seismic Network for Locating Events on Seismically Active Faults (RESNOR)"

6:30 p.m. - Mr. Ron Porcella, U.S. Geological Survey
"Strong Motion Instrumentation in the Imperial Valley, California."

7:00 p.m. - Dr. Cinna Lomintz, Instituto De Investigaciones De Matematicas Aplicadas y Sistemas, U.N.A.M.
"Seismic Alert Systems (RESMAC)"

Thursday, September 6, 1979 - Theme II: Analysis of the Risks to Human Settlements Posed by the San Andreas Fault

9:00 a.m. - Mr. Robert Olson, California Seismic Safety Commission
"Analyzing the Vulnerability of Metropolitan Areas to Earthquake Damage: The NOAA MODEL."

9:30 a.m. - Dr. Ovsei Gehlman, Ing. J. L. Rangel, Instituto de Ingenieria, U.N.A.M.
"A Systematic Analysis of Disasters: The Design of a Safeguard System."

10:00 a.m. Mr. Karl V. Steinbrugge, California Seismic Safety Commission
"Expected Earthquake Damage Based on the Southern California Experience."

10:30 a.m. Ing. Ricardo Toledo, Asociacion Mexicana De Seguros
"The Role of Insurance Institutions in the Study and Control of Risks to Human Settlements Affected by the San Andreas Fault."

11:00 a.m. - Dr. Karen McNally, California Institute of Technology
"Earthquake Studies in Southern California"

11:30 a.m. - Dr. Jose Luis Trava Manzanilla, Secretaria De Agricultura y Recursos Hidranlicos
"Hydraulic Conditions in the Baja California Area related to the San Andreas Fault System."

12:00 a.m. - Mr. Munson Dowd, Technical Council on Lifeline Earthquake Engineering:
"Council Goals and Activities."

12:30 a.m. - Ing. Luis Ramirez Ochoa, Comision Estatal de Servicios Publicos de Tijuana, B.C.
"Planning for the Safety and Operations of Public Services During Times of Emergencies."

1:00 p.m. - Mr. Donald Twogood, Imperial Irrigation District
"Historic Damage and Current Emergency Procedures."

1:30 p.m. - Ing. Guillermo A. Salas, Universidad de Sonora
"Geologic Risks to the City of Hermosillo, Sonora: Emphasis on Seismic Activity."

2:00 p.m. - Lunch Break

4:00 p.m. - Dr. Ralph Turner, University of California: Los Angeles "Earthquake Threat: The Human Response in Southern California."

4:30 p.m. - Arq. Armando Leroux, Direccion General De Prevencion y Atencion De Emergencias Urbanas - SAHOP
"The Rehabilitation of Human Settlements in the Baja California Areas of the San Andreas Fault."

5:00 p.m. - Mr. George Mader, William Spangle and Associates, Inc.
"Increasing Earthquake Safety Through Better Post-Earthquake Land Use Planning."

5:30 p.m. - Dr. Richard Olson, University of Redlands
"Public Policy Analysis and Hazards Research: Natural Complements."

6:00 p.m. - Arq. David Cymet L., Direccion General De Prevencion y Atencion De Emergencias Urbans - SAHOP
"Land Use Planning and Seismic Risk."

6:30 p.m. - Dr. Priscilla C. Grew, California Department of Conservation.
"Scientific Research Priorities in the Context of Hazard Mitigation."

7:00 p.m. - Mr. Stanley Scott, University of California, Berkeley
"Goals and Policies for Seismic Safety.

Mr. Peter Stromberg, California Seismic Safety Commission
"Impact of Hollister - Gilroy Earthquake of August 6, 1979"

Friday, September 7, 1979 - Theme III: Planning for Safety of Human Settlements on the San Andreas Fault

9:00 a.m. - Arq. Roberto Diaz, Secretaria De Asentamientos Humanos y Obras Publicas Del Estado De Baja California
"The State Plan for Urban Development in Baja California From a Seismic Safety Perspective."

9:30 a.m. - Arq. Salvador Hinojosa, Direccion De Planeccion Del Estado de Baja California Sur
"The State Plan for Urban Development in Baja California Sur From A Seismic Safety Perspective."

10:00 a.m. - Mr. Stuart R. Shaffer, Comprehensive Planning Organization - San Diego Region
"Planning for the Mitigation of Earthquake Hazards."

10:30 a.m. - Arq. Pablo Kimura, Estado De Baja California
"Earthquake Safety Regulations in the State of Baja California"

11:00 a.m. - Mr. Loring A Wyllie, Jr., H. J. Degenkolb & Associates
"Good Seismic Codes Do Not Always Mean Good Buildings"

11:30 a.m. - Dr. Robert Meli, Instituto de Ingenieria, UNAM
"The Safety of Low Income Housing in Seismic Zones."

12:00 p.m. - Ing. Miguel Angel Gamiz, Instituto Politecnico Nacional
"Professional Preparation for Post-Graduate Studies in Earthquake Mitigation"

12:30 p.m. - Mr. Alex Cunningham, California Office of Emergency Services
"State Programs for Disaster Planning & Response"

1:00 p.m. - Mr. Charles Mattingly, San Diego County Office of Disaster Preparedness
"Disaster Plans for San Diego County"

1:30 p.m. - Dr. Juan Medrano Padilla, Servicios Coordinados De Salud Publica Del Estado De Baja California

2:00 p.m. - Lunch Break

4:00 p.m. - Arq. Carlos Garcia, Secretaria De Assentamientos Humanos Obras Publicas Del Estado De Baja California
"Urban Emergencies Element of the Municipal Plan for the Urban Development of Tijuana"

4:30 p.m. - Sr. Heliodoro Flores D., Radio Comunicaciones y Emergencias Del Estado De Baja California
"Alert & Communication System in the State of Baja California"

Southern California Edison Company

P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

J. H. DRAKE
VICE PRESIDENT

TELEPHONE
213-572-2258

September 4, 1979

RELATED CORRESPONDENCE

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

My letter of August 16, 1979, transmitted a report entitled, "Evaluation and Action Plan for San Onofre Nuclear Generating Station Units 2&3 Relative to the Three Mile Island Incident." The report is the result of an extensive study of regulatory and industry-wide consensus of lessons learned from the Three Mile Island incident, and provides commitments to proceed with engineering and physical modifications deemed appropriate to provide an upgraded level of nuclear safety for San Onofre Units 2 and 3. As indicated in my letter, we have initiated engineering and procurement for the items in the report.

Also, on August 16, 1979, a meeting was held with members of your staff to review our report, to discuss the status of open items, and to reaffirm our request that licensing activities for San Onofre Unit 2 be placed back on a schedule consistent with issuance of an operating license by November, 1980. During this meeting, we also discussed with your staff additional steps we have taken to complete plant construction by November, 1980.

Regarding the status of open items, the majority of information requested by your staff has been provided, and all the information requested on the following four key issues in our license review has been submitted:

1. Geology-Seismology
2. Seismic Qualification Review
3. Dewatering Well Cavities
4. Structural Audit Results

We believe your staff generally agreed that expeditious disposition of these items is required for timely issuance of the Safety Evaluation Report.

At our meeting of August 29, 1979, I reiterated our requests that San Onofre licensing activities be placed back on a schedule consistent with issuance of an operating license in November, 1980, and that special attention be given to the four key areas noted above. Towards this end, Mr. Baskin will be requesting a meeting with Mr. Vasallo the week of September 24, to discuss the status within the NRC staff of each of the above items.

As noted in my letter of August 16, 1979, and as discussed in the above-noted meetings, it is extremely critical that San Onofre Units 2&3, remain on schedule. In addition to a monthly reduction in consumption of one million barrels of oil and resultant savings each month of $21 million to our customers from the operation of Unit 2, the capacity and energy from San Onofre are critical to reliably serve southern California customers in the summer of 1981 and beyond.

We have been responsive to your staff to address outstanding non-TMI licensing items. In addition, it is our view that we have made an unparalleled evaluation of TMI, coupled with the commitment to resolve safety questions prior to fuel load. Because of this, we believe that the NRC must at this time realistically face up to the schedular needs of the intermediate-term plants. Accordingly, San Diego Gas & Electric Company, and Southern California Edison Company again respectfully request that you take steps to provide the required effort to resolve the San Onofre Unit 2 open items in a timely manner consistent with a November, 1980, issuance of an operating license.

Sincerely,

J. H. Drake

cc: Joseph M. Hendrie