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 AUTH. NAME: AUTHOR AFFILIATION
 CLARK, R.B. Orange County, CA
 RECIP. NAME: RECIPIENT AFFILIATION
 GRIMES, B. NRC - No Detailed Affiliation Given

SUBJECT: Requests that comments re facility basic capability to respond to emergency, be considered as preliminary rebuttal, in response to FEMA 810603 ltr to NRC.

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SUPERVISOR, FOURTH DISTRICT

RALPH B. CLARK

CHAIRMAN OF THE BOARD OF SUPERVISORS

ORANGE COUNTY HALL OF ADMINISTRATION

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PHONE: 834-3440 (AREA CODE 714)

June 19, 1981

Mr. Brian Grimes
U. S. Nuclear Regulatory Commission
Washington, D. C. 20472

SUBJECT: Interim Findings and Determinations Relating to the Status
of State and Local Emergency Preparedness for the San Onofre
Nuclear Generating Station (Units 2 and 3)

Dear Mr. Grimes:

The County of Orange has been provided a copy of a memorandum from John Dickey, Federal Emergency Management Agency (FEMA) addressed to you, dated June 3, 1981 regarding the above noted subject. This is to advise that we do not understand and therefore disagree with the following portion of the interim findings:

"However, until corrective actions have been taken, the offsite capabilities for implementation of the plans are not considered adequate."

Mr. Dickey's memorandum which contains summary interim findings based on the May 13 exercise and a review of jurisdictional plans is not consistent with the findings contained in the Federal Emergency Management Agency "Evaluation Findings San Onofre Nuclear Generating Station Offsite Emergency Response Plans Exercise, May 13, 1981" report.

A special meeting was conducted in the City of San Clemente subsequent to the exercise. Mr. Ken Nauman of FEMA conducted the public meeting. He presented an overview of some preliminary findings that are now for the most part contained in the aforementioned official FEMA evaluation report. County representatives attending the meeting, as well as other jurisdiction representatives concluded that based upon the FEMA representatives' critique comments, there existed an adequate basic capability for implementation of plans. Areas for further improvement were identified, but there was no indication at the meeting an interim finding of inadequate capability for implementation of plans would be forthcoming from FEMA.

Subsequent to receipt of Mr. Dickey's memorandum to you, we reviewed the official transcript of the special meeting again and found no evidence to support the possibility of an interim summary finding that offsite capability for implementation of the plans should be considered not adequate. To the contrary, the transcript supports the statements regarding the basic adequacy of the implementation system of offsite emergency response jurisdictions attending the special meeting.

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Review of the Federal Emergency Management Agency "Evaluation Findings San Onofre Nuclear Generating Station Offsite Emergency Response Plans Exercise, May 13, 1981" report in fact shows the following findings from the exercise evaluation:

1. "Orange County demonstrated an acceptable ability to execute their emergency response plans to protect the public."
2. "San Clemente demonstrated, where observed, an acceptable ability to execute emergency response plans to protect the public."
3. "There was demonstrated an ability to respond to and competently address the nature of the emergency." (Refers to San Juan Capistrano).
4. "The (San Diego) County, where observed, demonstrated an acceptable ability to execute emergency response plans to protect the public."
5. "The USMC unit generally demonstrated an ability to execute emergency response plans to protect the public."
6. "Parks and Beaches overall capability to execute its emergency response plans to protect the general public was generally demonstrated to be good."

The primary reason that we disagree with the interim finding, however, is that there appears to be a lack of understanding or experience in the following areas:

- (a) Inter-jurisdictional planning and training efforts, e.g., in January 1981 an inter-jurisdiction exercise of the San Onofre Nuclear Generating Station response plans was held, which simulated an emergency at San Onofre Nuclear Generating Station; radiological monitoring training classes are routinely held by the County for all interested jurisdictions; and the plant operator has conducted an emergency medical assistance training program for concerned jurisdictions. Additionally, there exists a County-wide, City-County Emergency Planning Task Force as well as a special San Onofre Nuclear Generating Station inter-jurisdictional working task force, which transcends County boundaries.
- (b) Inter-jurisdictional operational coordination, equipment and support efforts as these relate to an event at San Onofre Nuclear Generating Station as evidenced in the exercise, other emergencies and day-to-day operations.
- (c) Capabilities for providing backup systems; e.g., alerting the public via loud speakers which currently are installed on all law enforcement cars within Orange County. All public safety organizations are connected and coordinated from one central location in Orange County via a very sophisticated, nationally and internationally acclaimed communication system. Over 2,000 police vehicles (including those of all cities

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in Orange County) can be communicated with directly; a subsystem of the communication system provides communication with all fire vehicles; ability to communicate with such other jurisdictions as hospitals, American National Red Cross and the California Highway Patrol also exists. Implementation of mutual aid agreements insures and provides for rapid cooperative backup support, whether it be for personnel, equipment or both. The County also has two fully equipped, self sufficient mobile communication command units that can be dispatched to any location. Although slight enhancements to the offsite emergency response communication system are anticipated to strengthen the already sound network, the basic communication system exists now to provide for inter-jurisdictional communications to respond to an emergency at San Onofre Nuclear Generating Station.

- (d) The real life operational experience developed by working cooperatively among jurisdictions to mitigate real (not simulated) emergencies.
- (e) Specific administrative operationalization or interpretation of NUREG 0654; different interpretations exist between the State and Federal government and to some degree between Federal agencies in interpreting specific intent, method of implementation and adequacy of compliance with NUREG 0654. During meetings with various state and federal officials preceding the May 13, 1981 exercise, there was often observed confusion and disagreements regarding specific application of NUREG 0654 to state and local governments.

There is an implication in the interim finding that there is no basic system capability to protect life and property at this time. This is not a valid interim finding as the basic capability exists today to provide for protection of the public in an event of an emergency at San Onofre Nuclear Generating Station. These comments will be more fully detailed and addressed within the next sixty days.

We do realize that emergency response planning and implementing plans to mitigate most emergencies, including an incident at San Onofre Nuclear Generating Station should be coordinated among all offsite jurisdictions contiguous to San Onofre Nuclear Generating Station and with the plant operator. A working task force was created after NUREG 0654 was adopted, and the task force efforts will continue. We view planning as an ongoing and evolutionary process subject to continued changes and enhancements to meet new requirements and/or decrease potential margins for errors in providing emergency response services.

The ongoing inter-jurisdictional planning efforts, acquisition of additional equipment, installation of dedicated sirens, distribution of public education materials, refinement of operating procedures as well as continued training and exercising will serve to maximize the level of preparedness and provide greater margins of safety for an emergency at the San Onofre Nuclear Generating Station. We believe all jurisdictions will continue in the San Onofre Nuclear Generating Station emergency preparedness effort as is the case in preparations

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for other types of emergencies. The bottom line, however, is that based upon the inter-jurisdictional cooperation, exercise performance and written plans, the basic capability exists today to adequately respond to an emergency at the San Onofre Nuclear Generating Station. We believe the most difficult part of the San Onofre Nuclear Generating Station emergency planning and incident mitigation process is already accomplished -- that is the development of a basic operational arrangement/interface procedure which results from many years of working cooperatively to respond to real emergencies in the region.

We are involved in the process of thoroughly reviewing the FEMA Evaluation Report and will respond with written comments regarding the County of Orange section of the report. Additionally, the ongoing inter-jurisdictional working task force composed of offsite emergency response agencies and the plant operator are reviewing findings as they pertain to the emergency response system for an incident at the San Onofre Nuclear Generating Station.

We request that you consider these comments as a preliminary rebuttal to portions of the FEMA interim finding, in anticipation of our full report as you review the FEMA June 3, 1981 memorandum from Mr. Dickey.

If there are any questions concerning this correspondence, please contact Bert Turner, Manager, GSA/Emergency Management Division at (714) 834-2323 or Barbara Fox, Assistant Director, GSA/Special Services at (714) 834-5745. We appreciate your review of this matter.

Sincerely,



RALPH B. CLARK, CHAIRMAN,
BOARD OF SUPERVISORS

cc: Federal Emergency Management Agency
County of Orange, Emergency Management Council
City of San Clemente
City of San Juan Capistrano
USMC, Camp Pendleton
San Onofre State Parks & Beaches
County of San Diego
Southern California Edison Company
State Office of Emergency Services