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 AUTH. NAME: BASKIN, K. P. AUTHOR AFFILIATION: Southern California Edison Co.
 RECIP. NAME: KNIGHTON, G. W. RECIPIENT AFFILIATION: Licensing Branch 3

SUBJECT: Repts status of emergency preparedness conditions per
 License Condition 2.C. Primary & backup meteorological towers
 & health physics computer sys fully operational. Spanish
 brochure in emergency planning zone not warranted.

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Southern California Edison Company



P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

February 4, 1983

TELEPHONE
(213) 572-1401

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

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

- References:
- A. Letter from K. P. Baskin (SCE) to F. A. Miraglia (NRC), dated July 8, 1982
 - B. Letter from K. P. Baskin (SCE) to Janis D. Kerrigan (NRC), dated September 27, 1982
 - C. Letter from Robert Dietch (SCE) to H. R. Denton (NRC), dated January 6, 1983
 - D. Letter from Robert Dietch (SCE) to H. R. Denton (NRC), dated January 14, 1983
 - E. Letter from K. P. Baskin (SCE) to George W. Knighton (NRC), dated December 15, 1982
 - F. NRC Facility Operating License No. NPF-10, Condition 2.C(23)
 - G. NRC Facility Operating License No. NPF-15, Condition 2.C(18)

The purpose of this letter is to report to the Nuclear Regulatory Commission (NRC) on the status of Emergency Preparedness Conditions noted in References F and G for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3). The reference license conditions are conditions of the Atomic Safety and Licensing Board (ASLB) Initial Decision of May 14, 1982.

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February 4, 1983

The NRC licenses (NPF-10 and NPF-15) for SONGS 2 and 3 require that these conditions be completed by February 17, 1983. Each license contains the same four conditions, identified as conditions 2.C(23)a.i-iv in License NPF-10 and 2.C(18)a.1-4 in License NPF-15. The status of the four conditions is identified by corresponding number as follows:

1. The meteorological towers, primary and backup, and the Health Physics Computer System are fully installed and operational. Reference E reported on the completion of the emergency response facilities at SONGS. The Health Physics Computer System and the data input from the meteorological towers are integrated parts of the emergency response capability at SONGS and were operational at the time Reference E was submitted to the NRC. In accordance with the remainder of these conditions, SCE continues to maintain offsite assessment and monitoring capabilities, as described in the ASLB hearing, at no less than that level of readiness, pending development of satisfactory capability of offsite response. For your information, the Federal Emergency Management Agency's (FEMA) critique of the 1982 emergency plan exercise indicated a satisfactory capability of offsite agencies in this regard. SCE considers this condition satisfactorily met.
2. SCE has completed an investigation into the need for a public education brochure/pamphlet in Spanish. Based on data collected from the Registrar of Voters and the Capistrano School District, along with cost estimates, SCE has concluded that there is no justification for implementing such a program. In summary, the results are as follows:
 - a. Approximately 80,000 people reside in the SONGS Emergency Planning Zone (EPZ), including about 17,000 on Camp Pendleton in San Diego County.
 - b. As few as 400 people (approximately 0.5%) in the EPZ are Spanish/non-English speaking.
 - c. Based on historical experience with bill enclosures, as few as 12-48 persons might ask for material on such an educational program.
 - d. The incremental cost to undertake a Spanish brochure is estimated to be as high as \$100,000 per year. This would more than double SCE's current costs.

Based on information from the Orange County Registrar of Voters and the Capistrano Unified School District, less than 2 percent (and more likely closer to 0.5 percent) of the population in the EPZ is Spanish-speaking and non-English or limited-English proficient. Because this Spanish-speaking population is difficult to locate, either SONGS public information both in Spanish and English would have to be mailed to all EPZ households and businesses or postcards or bill inserts would need to be sent to the entire EPZ population. In either case, the cost (as high as \$100,000) of producing and mailing this information is not warranted by the small audience in question (see Table IV enclosed).

February 4, 1983

Three tables are enclosed which use data from various sources to determine what percent of the population in the EPZ is primarily Spanish-speaking. Table III is probably the most accurate indicator of this information.

In addition, the Dymally Alatorre Bilingual Services Act provides guidance to California State agencies and requires non-English speaking materials and use of bilingual employees where there is 5 percent or more of a non-English speaking group. This bill, and the Federal Elections Act, which requires foreign language ballots for a non-English speaking group that amount to 5 percent or more of the population, support SCE's position that a Spanish brochure in the EPZ is not warranted. SCE considers that no further action on this condition is required.

3. Reference D submitted license amendment applications requesting the NRC to authorize operation of SONGS 2 and 3 beyond February 17, 1983. The original assumptions on which the timing for this condition was based are no longer valid. In order that the action requested of the NRC not conflict with the ASLB's position on this medical services issue, a motion to modify License Condition was also filed with the ASLB. Action on the motion and the amendment applications is pending.
4. References A, B and C discuss the status of condition 4. All reference to the "extended" Emergency Planning Zone (EPZ) concept has been deleted from the SONGS onsite and offsite plans and the Plume Exposure Pathway EPZ boundary has been extended, along with siren coverage, to Dana Point and all of San Juan Capistrano. SCE considers that this condition has been met.

If you have any questions, or if I can be of any assistance to you concerning the enclosed information, please contact me.

Very truly yours,

VP Bushan

Enclosures

cc: Mr. H. Rood, Project Manager
Licensing Branch No. 3

TABLE 1

SPANISH-SPEAKING POPULATION¹
SONGS EPZ

<u>Area</u>	<u>Total # of Registered Voters</u>	<u>Requested Voter Materials in Spanish</u>	<u>As a % of Registered Voters</u>
Capistrano Beach	3,241	4	.1%
Dana Point	6,357	10	.2
San Clemente	15,431	16	.1
San Juan Capistrano	<u>11,037</u>	<u>10</u>	<u>.1</u>
Totals	36,066	40	.1%

Assumptions:

The number of registered voters in the EPZ is approximately 50% of the total population. Therefore, double the % who require information in Spanish to include non-registered and ineligible voters (under 18 years of age) = .2%

Footnotes:

1. Persons who indicated on their voter registration affidavit form a preference for election materials in Spanish. Information provided by the Orange County Registrar of Voters, who said that most of these people do not have Spanish surnames. He suggested that many of them may be Spanish language students or teachers.
2. Data current as of August 1982.

TABLE II

SPANISH-SPEAKING POPULATION¹
SONGS EPZ

<u>Grade Level</u>	<u>Total # of Students</u>	<u>Spanish- Speaking Students¹</u>	<u>As a % of total # of Students</u>
Elementary	11,970	246	2%
Junior High		23	
High School	<u>5,362</u>	<u>33</u>	<u>1</u>
Totals	17,332	302	1.7%

Footnotes:

1. Students in the Capistrano Unified School District (CUSD) designated "Limited English Proficient" or "Non-English Proficient" (LEPNEP). These students attend a daily English language class in addition to all the regular classes. The fact that many of these Spanish-speaking students are brothers and sisters makes the 1.7% figure artificially high.
2. Information provided by Office of the Director of ESL (English as a Second Language) programs.
3. Data current as of April 1982.

TABLE III

SPANISH-SPEAKING POPULATION¹
SONGS EPZ

<u>Approximate Population in 10-Mile EPZ</u>	<u>Total CUSD/ ESL Enrollment</u>	<u>Spanish Enrollment</u>	<u>Spanish Enrollment As a Percent of Population in EPZ</u>
82,500	600	400	.5%

1. Adults whose primary language is Spanish and who are enrolled in the Capistrano Unified School District's (CUSD) "English as a Second Language" (ESL) classes.
2. Information provided by CUSD/ESL Coordinator.
3. Data current as of April 1982.

TABLE IV

ESTIMATED COST OF PRODUCING SPANISH
LANGUAGE EMERGENCY PLANNING PUBLIC INFORMATION
SONGS EPZ

CASE 1:

Mail SONGS emergency planning information in both Spanish and English to all households and businesses in the EPZ.

Assumptions:

Produce a one year's supply, including copies for new residents (700/month), agencies and jurisdictions, and public education programs.

Costs:

Translation Service	\$10,000
85,000 Emergency Information Handbooks	\$33,000
70,000 Residential Pamphlets	\$24,000
140,000 "Special Needs" postcards (2 per package)	\$ 2,000
15,000 Business pamphlets	\$15,000
30,000 Business posters (2 per package)	\$ 6,000
30,000 Sets District Stickers (2 per package)	\$ 1,500
Ads (pre and post mailing)	<u>\$ 5,000</u>
TOTAL	<u>\$96,500</u>

CASE 2:

Mail postcards in English and Spanish to all households and businesses in EPZ asking who requires SONGS emergency planning information in Spanish; then fulfill requests.

Assumptions:

It costs significantly less per unit to print 10,000 during the same run than to have 1,000 printed at ten different runs. These 10,000 would be used for new residents, agencies and jurisdictions and public education programs.

Costs:

Translation Services	\$10,000
33,000 postcards at 3¢	\$ 1,000
33,000 postage (1st class presort) @ 10¢	\$ 3,300
10,000 Emergency Information Handbooks	\$17,000
10,000 Residential Pamphlets	\$12,000
20,000 "Special needs" postcards (2 per package)	\$ 1,000
10,000 Business pamphlets	\$ 8,000
20,000 Business posters (2 per package)	\$ 3,000
20,000 Sets District Stickers (2 per package)	\$ 1,000
Ads (pre and post mailing)	\$ 5,000
TOTAL	<u>\$61,300</u>

CASE 3:

Mail bill enclosure in English and Spanish to all households and businesses in EPZ requesting a response from those needing SONGS emergency planning information in Spanish. This method would save the additional cost of postage (\$3,300) required for the separate postcard required in Case 2.

Assumption:

The chief drawback of this method is that the historical response to bill enclosures is only 1% compared to 2% to 3% for direct mail postcards as in Case 2.

Costs:

33,000 Bill Inserts @ 3¢	\$ 1,000
Other costs would be the same as for Case 2, minus postcard and mailing costs	<u>\$57,000</u>
TOTAL	<u>\$58,000</u>