

JAN 13 1976

Docket Nos. 50-361  
and 50-362

Mr. Al Dowden  
2206 Alta Vista Drive  
Vista, California 92083

Distribution

Docket File  
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TIC

Dear Mr. Dowden:

Your letter of November 25, 1975, to the Nuclear Regulatory Commission has been referred to me for reply. I am pleased to provide the following information regarding the San Onofre Nuclear Generating Station.

As you know, the first nuclear plant at San Onofre was constructed in the mid 1960's and began commercial operation in 1968. In 1970, the Southern California Edison Company applied to the Atomic Energy Commission (now the NRC) for licenses to construct the second and third nuclear power plants (Units 2 and 3) at San Onofre. After a thorough review and a lengthy public hearing, in 1973 we issued construction permits for Units 2 and 3, and construction is currently underway. Units 2 and 3 are scheduled to become operational in 1980 and 1981, respectively.

In your letter you express concern that the surfing areas in the vicinity of the San Onofre Nuclear Generating Station may be closed as a result of the establishment of a "new protective zone" around the station. You specifically mention the lease area known as Parcel 2.

While it is true that an "exclusion area" will be established around the new units at San Onofre as a result of NRC regulations (10 CFR Part 100), the exclusion area will be limited to a prescribed area encircling the station site. The lease area known as Parcel 2, which adjoins the station site, will not be included in the exclusion area. Public access to, and use of, Parcel 2 will not be restricted as a result of NRC regulations.

I hope that this letter has been responsive to your concerns.

Sincerely,

Original Signed By  
R. A. Birkel

*for*

Olan D. Parr, Chief  
Light Water Reactors  
Project Branch 1-3  
Division of Reactor Licensing

OFFICE ➤	RL:LWR 1-3	OELD	RL:LWR 1-3			
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Nuclear Regulatory Commission  
Washington, D. C. 20555

November 25, 1975

Dear Sirs:

The State of California through the State Park and Recreation Department has leases from the Federal Government on what is known as Camp Pendleton. One of these lease areas is called parcel 2, or better known as the San Onofre Surfing Beach. For over four decades surfers under private ownership, military authority and now under state jurisdiction have worked to avail themselves of the unique surf conditions that the littoral and sub-littoral areas of San Onofre can produce.

In the early years surfboards were so heavy that it was strictly a man's sport with such a difficult learning period surfers were regarded as somewhat odd, for being addicted to a Pacific Island native sport. During World War II and immediately afterward surfers worked continually at introducing Marine Officers to the sport of surfing and other proselytisms, so they could be allowed to continue at San Onofre. A big factor here was that military activities very rarely ranged to this then isolated Northwesterly corner of Camp Pendleton, which is large.

After World War II, surfers were able to obtain more formal access to San Onofre, first through a series of letters from the Commanding General of Camp Pendleton and later through leases from the Navy Department. Surfing in the meantime experienced almost Malthusian growth as surfboards evolved to about ten percent of their weight in the immediate post-World War II era, and surfing became a family sport at San Onofre and part of the teen-age culture elsewhere. In fact, when the Surf Beat is up now, there is an almost Lemming like migration to the sea, which makes some of us quite nostalgic for the "good old days" when one almost knew every surfer in Southern California, and some beaches were considered crowded when five surfers were present.

In the early sixties, there were many changes in the San Onofre area. The small country school which had been abandoned, disappeared, the church whose bell you could occasionally hear on Sunday when you were out in the water surfing, was stilled, the San Onofre Railroad station was idled and the Haven's who had farmed the San Onofre creek alluvium for decades, left the land. The Poinsettias were no longer growing on the hilly slopes, and their color was replaced by that of fallowness. Access to a remaining section of the old Pacific Coast Highway was finally cut off as over-passes and under-passes were constructed to abandon a large section of Highway 101 to implement what is now Interstate 5.

About this time, as President of the San Onofre Surfing Club, I was indirectly urged by sympathetic Navy Department Personnel to write and make a brief appearance before the San Diego Regional Water Pollution Control Board, and indicate in effect that Surfers would not thrust their bare bodies in the way of the then proposed nuclear electric generating plant. Up until this time, the proposed installation had been kept in very low profile and in fact some were disturbed, that surfers knew about it. Well, ingrained with long years of constructive co-operation and with the numerous public assurances that it would be no hazard to us, I responded with alacrity. Besides, the club had other problems, it had developed opposition because of its uniqueness, a surfing club on a military base, and some discussions relative to development of other surfing areas concomitant with a longer term license for surfing in the San Onofre area were also underway. The nuclear power plant was built, and they disposed of thousands of tons of spoil on the colorfully eroded bluffs back of the surfing beach. I guess they thought they had improved the bluff, but to us, it looked like a giant condominium was being erected next door to our home.

Now we hear that for reasons of safety, part or all of the beach may be closed. Presumably, some kind of a radiation safety zone now needs to be established.

Surfers originally acquiesced to the public nuclear power installation as the public need was there for power and the risks, described were what some now call trans-scientific as explained in the following:

A past director of the Oak Ridge National Laboratory, in a recent editorial in Science suggested that the effects of low dose radiation should be included among the "questions that can be stated in scientific terms, but that are in principle beyond the proficiency of science to answer." In a recent paper he wrote, "I proposed the term 'trans-scientific' for such questions. For example, the biological effect on humans of very low level radiation . . . . will probably never be fully ascertained, simply because of the huge number of animals required to demonstrate an unequivocal effect. Estimates of extremely unlikely events (such as a serious reactor accident) can never be made with scientific validity that one can apply to estimates of events for which there are abundant statistics. In the current attempts to weigh the benefits of technology against its risks, the protagonist often ask for the impossible: scientific answers to questions that are 'trans-scientific'."

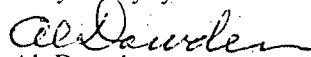
If a new protective zone around the San Onofre Nuclear Power Plant now needs to be established, it appears that a design error has been discovered, new knowledge indicates the need for such a zone, or Surfers and the public were deliberately misled as to the risks at the inception.

In any event, enough is enough. I urge the design error be corrected if that is the case, or changes be made to keep the plant in the 'trans-scientific' area of safety or shut it down and forget it. Surfers at San Onofre have never used their organization to appose what for a long time was called progress, even though dismayed by it. Surfers look to the Commission to see that assurances of safety given over a decade ago are kept.

Surfers strongly appose any suggestion that Radiation is their problem. Radiation is the Electric Utilities problem. If they can't handle it, they shouldn't be in the business.

We ask that the Commission behave accordingly.

Very truly yours

  
Al Dowden  
2206 Alta Vista Drive  
Vista, California 92083