

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



In the Matter of: )  
 )  
PACIFIC GAS & ELECTRIC COMPANY )  
(Diablo Canyon Nuclear Power )  
Plant, Units 1 & 2) )

Docket Nos. 50-275 OL  
50-323 OL

ERRATA SHEET  
TO THE JOINT INTERVENORS' REQUEST  
TO REOPEN OR, IN THE ALTERNATIVE,  
REQUEST FOR DIRECTED CERTIFICATION

Listed below are corrections to the above titled request,  
filed on May 9, 1979.

<u>Page/Line</u>	<u>Reads</u>	<u>Should Read</u>
2/19	reommended	recommended
2/27	core melt	partial core melt
3/6	Rassmussen	Rasmussen
4/7	"AEC, "Protection	AEC, "Protection
4/9	Red. 39064	Reg. 39064
4/10	"NRC, "Statement	NRC, "Statement
4/12	Group Report (January	Group Report" (January
7/7	studies point up	studies point out
7/10	report to gut federal	report to guide federal
7/27	RESERVE PLANTS IN	RESERVE PLANS IN
7/28	NUREG-1396;	NUREG-0396;
7/29	(December, 1968)	(December, 1978).
8/6	Accounting Office	Accounting Office (GAO)
8/19	power-plants as	power plants as
8/25	GAO, AREAS ARROUND	GAO, AREAS AROUND

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<u>Page/Line</u>	<u>Reads</u>	<u>Should Read</u>
9/5	to determine the merits of the GAO recommendations for Diablo Canyon.	to determine the adequacy of the emergency response plans for Diablo Canyon.
9/20	in Diablo County	in Diablo Canyon
9/25	[no entry]	[Attached]

Respectfully submitted,

*David S. Fleischaker*

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Counsel For Joint Intervenors

May 10, 1979

2271 003

U.S. NUCLEAR REGULATORY  
COMMISSION

1979 MAY 5 PM 1:25

NRC BHDA  
SPL115 WAB362(1849)(4-084908E124)PD Q5/04/79 1849  
ICS IPMRNOZ CSP  
9164452843 TDRN SACRAMENTO CA 397 05-04 0649P EST TELECOM-CR-UF05  
PMS THE HONORABLE JOSEPH M HENDRIE, CHAIRMAN NUCLEAR REGULATORY  
COMMISSION, FON  
WASHINGTON DC 20555  
DEAR CHAIRMAN HENDRIE

THE ISSUANCE OF AN OPERATING LICENSE FOR THE DIABLO CANYON POWER  
PLANT IS PRESENTLY PENDING BEFORE THE ATOMIC SAFETY AND LICENSING  
BOARD OF THE NUCLEAR REGULATORY COMMISSION.

I AM CONVINCED THAT THIS LICENSING PROCESS SHOULD BE SUSPENDED  
PENDING SATISFACTORY RESOLUTION OF THE FOLLOWING: 1. COMPLETION OF  
THE SAFETY ANALYSIS INTO THE EVENT SURROUNDING THE THREE MILE ISLAND  
ACCIDENT AND THE APPLICATION OF SUCH FINDINGS AS WELL AS

IMPLEMENTATION OF NECESSARY MODIFICATIONS SUGGESTED THEREIN TO THE  
REACTOR AT DIABLO CANYON. 2. IMPLEMENTATION OF SATISFACTORY  
EMERGENCY PREPAREDNESS MEASURES NOW BEING SUBSTANTIALLY REVISED BY  
THE CALIFORNIA EMERGENCY POWER PLANT REVIEW PANEL 3. DETERMINATION  
OF CURRENT PLANT DESIGN ADEQUACY TO WITHSTAND EARTHQUAKES IN THE  
DIABLO CANYON AREA OF THE MAGNITUDE IDENTIFIED BY THE U.S.  
GEOLOGICAL SURVEY.

FINALLY I AM INFORMED THAT THE DESIGN OF NUCLEAR POWER PLANT CONTROL  
ROOMS MAY REPRESENT SIGNIFICANT SAFETY HAZARDS. IN RECENT DOCUMENTS  
DEVELOPED FOR THE NUCLEAR REGULATORY COMMISSION ON HUMAN FACTORS  
ENGINEERING, BROAD CATEGORIES OF GENERIC CONTROL ROOM DESIGN HAZARDS  
WERE IDENTIFIED. YOUR APRIL 12 1978 REPORT TO THE CONGRESS ENTITLED  
"PLAN FOR RESEARCH TO IMPROVE THE SAFETY OF LIGHT WATER NUCLEAR

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POWER PLANTS" CONFIRMED THE IMPORTANCE OF DEALING WITH THESE  
HAZARDS.

IN LIGHT OF THESE SUBSTANTIAL AND UNRESOLVED ISSUES I REQUEST A  
MORATORIUM ON THE LICENSING OF THE DIABLO CANYON NUCLEAR POWER  
PLANT. SINCERELY

EDMUND G BROWN, JR., GOVERNOR

ADDENDUM ATTACHED

ADDENDUM I REFER THE NUCLEAR REGULATORY COMMISSION TO THE FOLLOWING  
STATEMENT OF THE ATOMIC SAFETY AND LICENSING APPEALS BOARD MADE  
IN REVIEWING THE HEARING BOARD'S DENIAL OF SUBPOENAS FOR ADVISORY  
COMMITTEE ON REACTOR SAFEGUARDS CONSULTANTS: "THE ABILITY OF  
NUCLEAR POWER PLANTS TO WITHSTAND EARTHQUAKE DAMAGE IS UNDENIABLY  
CRUCIAL IN CALIFORNIA... THIS IS MORE THAN A RUN OF THE MILL

DISAGREEMENT AMONG EXPERTS. WE HAVE HERE A NUCLEAR PLANT DESIGNED  
AND LARGELY BUILT ON ONE SET OF SEISMIC ASSUMPTIONS. AN INTERVENING  
DISCOVERY THAT THOSE ASSUMPTIONS UNDERESTIMATED THE MAGNITUDE  
OF POTENTIAL EARTHQUAKES, A REANALYSIS OF THE PLANT TO TAKE  
THE NEW ESTIMATES INTO ACCOUNT, AND A POST HOC CONCLUSION THAT  
THE PLANT IS ESSENTIALLY SATISFACTORY AS IS BUT ON THEORETICAL  
BASIS PARTLY UNTESTED AND PREVIOUSLY UNUSED FOR THESE PURPOSES.  
WE DO NOT HAVE TO REACH THE MERIT OF THOSE FINDINGS TO CONCLUDE  
THAT THE CIRCUMSTANCES SURROUNDING THE NEED TO MAKE THEM ARE  
EXCEPTIONAL IN EVERY SENSE OF THAT WORD."

1. MEMORANDUM AND ORDER, ALAB 519, JANUARY 23, 1979, 2 CCH NUC.  
REG. REPORT, PARA 30, 357.

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WU TRX WSH

NRC BFOA

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STATEMENT BY  
WILLIAM H. WILCOX, ADMINISTRATOR  
FEDERAL DISASTER ASSISTANCE ADMINISTRATION  
BEFORE THE  
PRESIDENT'S COMMISSION ON THE ACCIDENT AT  
THREE MILE ISLAND

APRIL 26, 1979

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A public T.V. program on Three-Mile Island Monday night reported that there are now known to be underway nine different investigations of one aspect or another of the TMI incident. There will come from these investigations and the specialized studies to follow a mass of findings and recommendations covering sociological, scientific, legal, economic and mental and physical health aspects of TMI. Within a few years, the people of metropolitan Harrisburg, Pennsylvania, may be the most studied people in the world. No doubt they will have long since tired of it!

A Presidential Commission has an opportunity to stand above this and review the overall policy perspective. I hope you will present to President Carter no more than a half dozen clear and simple major policy findings and recommendations, supported by such extensive documentation as may be required.

In fact, the six functions assigned to the Commission by President Carter provides primarily the foundation needed for addressing the broad issues the March - April radiological incident at TMI raises. This testimony deals largely with the issue of preparedness raised by (C) in the Commission's charter.

Governor Thornberg has said he's now ready for the second guessers. Let me say that I was not present at Three Mile Island like my two companions and advisors here this morning -- Mr. Robert Adamcik, Regional Director

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of Region III, Philadelphia, Federal Disaster Assistance Administration and Mr. John McConnell of the Defense Civil Preparedness Agency of the Department of Defense. I have, however, had considerable experience with emergency management both as Secretary of Community Affairs in Pennsylvania for six and one-half years and as Administrator of the Federal Disaster Assistance Administration for the last 15 months. During the TMI crisis days I personally directed the FDAA Operation Center which, at the direction of the White House, served as a bridge between the Nuclear Regulatory Commission (NRC) and most of the other Federal agencies providing support. For 10 days we provided a daily report on Federal activities to Jack Watson. Mr. Adamcik coordinated non-scientific Federal operations in Harrisburg. Mr. McConnell provided critical technical assistance to the State and counties in planning for possible evacuation.

While we propose to avoid the invidious implications of second guessers, some preparedness lessons, perhaps also applicable to other places and times, now appear evident for the TMI emergency. I respectfully suggest the following initial findings which can be subject to later verification. I certainly would be prepared to defend them here under questioning:

1. The Nuclear Regulatory Commission lacks both the carrot (dollars) or the stick (authority) to encourage adequate state and local governmental preparedness for

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radiological accidents?

2. Many of the assurances provided by public agencies to the Metropolitan Edison as to available resources in the case of a radiological incident at TMI were so much bureaucratic boilerplate and were not always relevant to actual capability.

3. Annex E, Nuclear Incidents (Fixed Facility) of the Commonwealth of Pennsylvania Disaster Operations Plan is so vague as to be of little value.

4. The pre-emergency coordination between county civil defense organizations was weak and inadequate.

5. The area and population contemplated for evacuation was much greater in actuality than that provided for in the pre-emergency plans.

6. Responsible Federal agencies have not given sufficient priority to the prompt review of State Radiological Emergency Response Plans.

I respectfully suggest that pre-emergency planning and readiness requires coordination, cooperation and communication. The need for these 3 C's in other types of community and area planning, such as highway planning, economic development and health and hospital planning, has been demonstrated by experience decades ago and TMI may well have demonstrated the need for this type of planning and readiness structure in emergency operations, too. While the Federal Government must be sensitive to state and local laws and customs, it should, in my view, set the framework requirements for a

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'specialized, regionalized coordinated emergency response structure, designed in the detail by the state's governor or legislature. The creation and effective planning by such a governmental or quasi-governmental agency should be a prerequisite for a licensee to operate a new nuclear power plant and should be required, after a reasonable time span, of existing plants as a condition for continued operation. Among the agencies which would be represented on the policy-making body would be the NRC and/or the Federal Emergency Management Agency (FEMA), the State Bureau of Radiological Health, the State emergency officer, the county, city or town executives on governing bodies and the licensee.

With respect to either emergency planning or operations no advisory commission can compel effective plans and readiness. The Commission, however, can suggest a structure that will encourage coordination, cooperation, and communication. What I have proposed here will, in my view, do just that.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



In the Matter of: )

PACIFIC GAS & ELECTRIC COMPANY )  
(Diablo Canyon Nuclear Power )  
Plant, Units 1 & 2) )

Docket Nos. 50-275 OL  
50-323 OL

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of May, 1979 served copies of the foregoing REQUEST TO REOPEN OR, IN THE ALTERNATIVE, REQUEST FOR DIRECTED CERTIFICATION to all of the parties listed below by depositing copies thereof in the U.S. Mails, First Class, postage prepaid.

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