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and SAN DIEGO GAS & ELECTRIC COMPANY
11

12 UNITED STATES OF AMERICA

13 NUCLEAR REGULATORY COMMISSION

14 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

15 In the Matter of:) Docket Nos. 50-361 OL
) 50-362 OL
16 SOUTHERN CALIFORNIA EDISON)
COMPANY, et al., (San Onofre) PROOF OF SERVICE
17 Nuclear Generating Station,)
18 Units 2 and 3).)
19 _____)

20 I, SAMUEL B. CASEY, declare that:

21 I am employed in the City and County of San Francisco,
22 California.

23 I am over the age of eighteen years and not a party
24 to the above entitled action; my business address is
25 600 Montgomery St., 10th Fl., San Francisco, California 94111.
26

On June 2, 1981 I served the following documents:

1. FEMA, Region IX, R. H. Sandwina, Chairman
FEMA/Regional Assistance Committee, letter
dated April 27, 1981 to California Office of
Emergency Service, A. R. Cunningham, Director,
enclosing the informal Regional Assistance Com-
mittee review of San Onofre Nuclear Generating
Station Offsite emergency response plans;
2. Transcript of Hearing before FEMA, critique of
San Onofre Nuclear Generating Station Offsite
Emergency Response Plan Exercise conducted on
May 13, 1981, dated May 14, 1981;
3. Transcript of Public Meeting before FEMA on
San Onofre Nuclear Generating Station Offsite
Emergency Response Plan, dated May 18, 1981.

Said documents were served on the parties in said
cause by placing a true copy thereof enclosed in the United
States mail at San Francisco, California, addressed as follows:

James L. Kelley, Chairman
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Cadet H. Hand, Jr.
Administrative Judge
c/o Bodega Marine Laboratory
University of California
P.O. Box 247
Bodega Bay, CA 94923

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San Diego, CA 92111

Mrs. Elizabeth B. Johnson
Administrative Judge
Oak Ridge National Laboratory
P.O. Box X, Bldg. 3500
Oak Ridge, Tennessee 37830

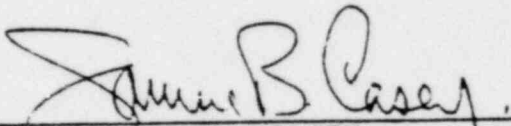
Lawrence J. Chandler, Esq.
Richard K. Hoefling, Esq.
Edward G. Ketchen, Esq.
Office of the Ex. Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Docketing and Service Station
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

1 Dated this 2nd day of June, 1981 at San Francisco,
2 California.

3 I declare under penalty of perjury that the fore-
4 going is true and correct.

5
6 By 
7 SAMUEL B. CASEY
8 One of counsel for Applicants
9 Southern California Edison Co.
10 and San Diego Gas & Electric Co.
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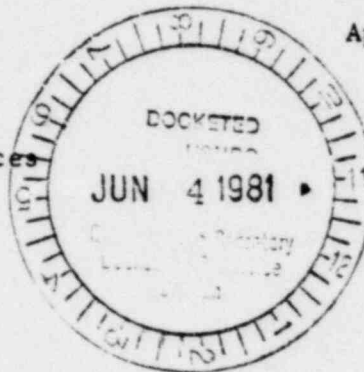
SOUTHERN CALIFORNIA EDISON

FEDERAL EMERGENCY MANAGEMENT AGENCY

Region IX 211 Main Street, Room 220 San Francisco, CA 94105

April 27, 1981

Mr. Alex R. Cunningham
Director, Office of Emergency Services
State of California
Post Office Box 9577
Sacramento, California 95823



Dear Mr. Cunningham:

The Federal Emergency Management Agency Region IX (FEMA RIX) and its Regional Assistance Committee (RAC) have conducted an informal review of the San Onofre offsite emergency response plans. The criteria used for this review are detailed in NUREG 0654/FEMA REP-1, Revision 1, dated November 1980.

The review format reflects that all parts of the plan should be considered acceptable unless they have been identified with a comment or question.

This review is dated and shall become a part of the total and ongoing review process. Changes or corrective actions to meet the review criteria will be entered into the plan review record and will, therefore, reflect the current dynamic status of the plans and the plan review upon receipt of officially documented correspondence from the originator. Questions or clarification regarding the review should be forwarded to FEMA RIX, attention Mr. Kenneth W. Nauman, Jr.

As indicated in NUREG 0654/FEMA REP-1, the RAC strongly suggests that multi-jurisdictional plans coordination meetings be established to both review in detail the various issues identified by this review, and to develop a joint interjurisdictional plan. The resultant outcome should aid in the reduction of the total time commitment of all jurisdictions involved in support of San Onofre.

A copy of this correspondence and appropriate plan(s) have been sent directly to the jurisdictions in the interest of time.

Sincerely yours,

Ronald H. Sandwina
Ronald H. Sandwina, Chairman
Regional Assistance Committee

Enclosures 7

Review of: Orange County Emergency Response Plan
San Diego County Emergency Response Plan
San Clemente Emergency Response Plan
San Juan Capistrano Emergency Response Plan
U.S. Marine Corps, Camp Pendleton Emergency Response Plan
State Parks and Beaches Emergency Response Plan

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APR 1981

INFORMAL REVIEW

ORANGE COUNTY EMERGENCY RESPONSE PLAN

December 1980

NUREG 0654/FEMA REP-1
EVAL. CRITERIA ELEMENT

COMMENT

- A.1b The plan reflects both general and detailed concepts of operation; however, no concurrence is evident of the tasking or coordination of organizations outside Orange County. No designation exists regarding the composition, operation, or manpower of the "mobile monitoring teams."
- A.2a It is not clearly indicated in the plan which agency or individual controls the siren system and who has the authority to activate it; the radiological monitoring teams, and radio and television announcements on the emergency broadcast system.
- A.3 The plan does not provide for written agreements with other agencies. Other than generalized planning identified in State and Federal planning, no specific tasking has been concurred in.
- C.3 No identification of radiological laboratories and their capability. This criteria (C.3) applies to local jurisdictions in light of assumed monitoring duties.
- C.4 U.C. Irvine was mentioned as an organization which could be relied upon in an emergency to provide assistance, but there was no indication if a letter of agreement had been accomplished. Such assistance should be identified and supported by appropriate letter of agreement.
- D.4 Further description is recommended regarding other protection actions for emergency and protective actions in outlying areas.

ORANGE COUNTY (INFORMAL REVIEW)

NUREG 0654/FEMA REP-1
EVAL. CRITERIA ELEMENT

COMMENT

- E.6 The Warning Plan was not included for review. There was no information on siren coverage or control except that the sirens will not cover Dana Point. Some reference to that issue should be addressed. Further address of coordinated public information action is recommended.
- E.7 It was not clear in the plan when and how the prepared messages will be aired; e.g., during "Alert?" Also, there was no sheltering information relating to potassium iodide (KI).
- F.1b The plan does not contain provision for communications with contiguous State/local governments within the Emergency Planning Zones. A Communications Annex should be included in the plan.
- F.1c Other than normal telephone land lines, no reference is made to communications links to Federal emergency response organizations, including organization titles and alternates.
- G.4b The licensee should provide space for and identify news media (pool) at nearsite emergency operations facility.
- There was no specific reference in the plan relating to a coordinated exchange of information.
- It is suggested that each sample press release be titled or numbered to prevent the issuance of the wrong release and assure sequential organization.
- G.4c The rumor control telephone number should be available and specifically identified as rumor control.

ORANGE COUNTY (INFORMAL REVIEW)

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COMMENT

- H.7 Reference is made in the plan to provision of monitoring equipment, but there is no specific identification of equipment.
- H.11 There is no identification of emergency kits made in the plan.
- I.7 Although reference is made to the development of an offsite monitoring capability, resources for such field monitoring within the plume exposure zone are not identified.
- I.8 The plan does not provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways.
- I.11 Although this criteria element in NUREG 0654/FEMA REP-1 is not listed as applicable to the local level, either California or the county must ask for Federal assistance. The plan does not identify whose responsibility it is to request Federal assistance, where necessary.
- J.2 No reference is found that addresses this criteria.
- J.9 Although the plan mentions in general terms conceptual events, no specific, definitive, clear and comprehensive address of these items is present.
- J.10a Maps in the plan show evacuation routes, evacuation areas, reception centers, but the radiological sampling and monitoring points are not identified or depicted.

ORANGE COUNTY (INFORMAL REVIEW)

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EVAL. CRITERIA ELEMENT

COMMENT

- J.10b Maps were not shown with population distribution around the nuclear facility.
- J.10d Although the plan assigns the HSA EMS Division the responsibility of identifying handicapped individuals, the responsibility for the transfer of handicapped is unclear. Further, no capability or plans for execution are identified.
- J.10e Although provisions for the use of radio-protective drugs has been identified for emergency workers, no provisions have been identified for institutionalized persons within the plume exposure EPZ. No indication of stockpile or dissemination/accountability is made.
- J.10f Suggest method of coordination with State and other local jurisdictions be identified.
- J.10g While maps are to be provided to the public, suggest more detail be included on how non-car owning individuals are to be transported. Relocation problems/conditions are identified but no specific concept of operations or sequential address of specific functional assignments is made.
- J.10i Traffic capacities are reflected in a general fashion where more specific identification regarding actual evacuation routes is recommended.
- J.10k The plan does not reflect provisions for decision-making factors to carry out the evacuation successfully such as earthquake problems or seasonal impediments.

ORANGE COUNTY (INFORMAL REVIEW)

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COMMENT

- J.10L A minority opinion reflected that the same time estimates are given for San Diego County and the Interagency Agreement and Evacuation Procedures. The terrain, roadways, etc., are identical. CALTRANS and the California Highway Patrol have some concern regarding the estimates.
- J.10m This element, as listed in NUREG 0654/FEMA REP-1, is not listed as an action for "locals," but the California State Plan indicates it is the local's responsibility; therefore, Orange County may wish to clarify or address this element in their plan.
- J.11 It is noted that a specific annex on Ingestion Pathway Zone will be added to the plan. Request this annex be forwarded to the RAC as soon as it is published.
- J.12 While the means for registering and monitoring evacuees is indicated, the tasking of State and Federal agencies to support reflects a requirement for further detail as to specific requirements.
- K.3a Suggest an individual be designated in the EOF or EOC to be responsible for maintaining personal dose assessments and assure readings are recorded and maintained for protection of all involved personnel. No reflection of whether the contract has been effected was indicated.
- K.4 The ALARA concept was stated for emergency workers (page V-35). Since the ALARA philosophy is an attempt to equate radiation exposure to economic gains in routine planned uses of radiation, the application of ALARA in an emergency situation is not proper. It is recommended that V3a(2) be changed to read "Radiation exposures to emergency personnel should be commensurate with the significance of the objectives and should be held to the to the lowest practicable levels that the

ORANGE COUNTY (INFORMAL REVIEW)

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COMMENT

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| K.5a | Criteria are established, but definition as to procedure and reference figures is confusing and further elaboration is suggested. |
| L.4 | Arrangements for transporting victims of radiological accidents to medical support facilities was not observed in the plan. |
| N.2a | Reference Attachment 1, page 1-1, item 7-- Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested "quarterly," not "annually" as indicated in the plan. |
| N.2d | Radiological monitoring drills were not found to be addressed in the plan. |
| N.2e(1) | The State of California Plan reflects this responsibility has been delegated to the County level. No mention of the health physics drills was observed in the plan. |
| O.1 | The plan reflected a requirement that all agencies insure proper training is attained. Suggest further address as to how this is to be done. |
| O.1b | The plan reflects each agency is responsible for training appropriate personnel to respond as required. Further elaboration is necessary in the County EMS plan to assess the quantity and quality of the training. |
| O.4 | Further elaboration regarding training in each area is recommended. |

ORANGE COUNTY (INFORMAL REVIEW)

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COMMENT

- 0.5 The quantity and quality of the retraining was not assessable. Suggest further elaboration regarding this issues.
- P.5 Plan does not reflect a distribution list nor are the plans issued under a form of control. This may preclude adequate coverage of all plan holders when changes are made.

ORANGE COUNTY (INFORMAL REVIEW)GENERAL COMMENTS

1. Sheltering is also an alternative countermeasure that should be more adequately discussed. No agency responsibility was found to cover this issue.
2. There is no address made to support, identification, or handling of critical industry, agriculture, or business in case of evacuation. These systems cannot be simply shut down in an instant.
3. Reference page I-3, ID1b. The "specific planning objectives provided" (in detail) were not observed in the plan.
4. It is felt that too much dependence is reflected on "other" agencies such as utility and Federal government without explicitly detailed agreements and reference to detail. Suggest a more coordinated response by all agencies to reduce the total workload.
5. The direct line from the Technical Support Center (TSC) is not recommended for use for anything other than initial alerting. Confusion may be created if the Emergency Operating Facility (EOF) and TSC lines are both active to the EOC's during the course of the crisis.
6. Further work is felt necessary regarding detailed supporting plans that specifically identify tasked individuals and procedures for execution of a response capability. Without this the plan does not show a clear concise ability to respond to the crisis.
7. The Interagency Agreement and Evacuation Procedures (IAEP) Plan was not reflected as having concurred in in this plan. No clarify exists regarding inter-communications among jurisdictions, nor handling of any joint analysis of dose accumulations, dose assessment, information releases, or other activities.
8. No methodology of general alert warning is identified for Dana Point, although they are stated to be omitted from the EPC (reference page V-6, paragraph B2a(1)). Their proximity to the site reflects a need for clarification regarding warning and handling of emergency response.

ORANGE COUNTY (INFORMAL REVIEW)

9. No identification has been made regarding the specific personnel and quantities to be provided by the utility to do the various tasked functions identified in the plan.

10. No reflection was made to the make-up, requirements, procedures, sources, or equipment of the mobile monitoring teams was found. Who is controlling their activities? (Reference page III-3, paragraph C.)

11. Who is the "proper authority" referred to in line one? (Reference page V-6, paragraph B1c(9)). The statement appears to be unclear.

12. The plan appears to be well written and organized; however, there are some major weaknesses due to the need for more specifics. For instance, the statement is made that the Orange County Office of Emergency Services will provide radiological monitoring instruments, maintain calibration on a quarterly basis, and service the instruments. However, the number available, location, or type are not stated. Another example is an immediate request is to be made for Federal monitors to staff relocation centers. This request has not been coordinated and must then be considered inappropriate. The most urgent resource being for environmental monitoring and assessment. Yet a "highly trained radiation monitor" is reflected for personal checking at a relocation center. Clarification of titles, duties, training and operations is needed to eliminate these problems.

13. The ability to prevent unacceptable exposure and provide effective, proper actions will be dependent on the ability to obtain valid radiological measurements. Yet, in this plan, one of the most, if not the most, important activities--radiological monitoring--seems to have the least degree of address. There are no guidelines for population or worker exposure; KI is provided only for Orange County workers; dosimetry records are to be monitored but there is no reference as to when. It is unclear who decides an emergency worker can get 25 rem or 100 rem. There appears to be a need for professional health physics input to the plan. A perspective of what radiation exposures mean appears to be useful. No environmental sampling information is evident such as location of dairy, crops, water supplies, etc.

14. Agreements for operations between the counties and the cities are necessary and must be addressed. In addition, an operating agreement between Orange and San Diego Counties must be addressed. Actions within the low population zone and the EPZ will involve both counties. Neither county should take independent action, nor should any of the cities take independent action in the course of the crisis. Coordinated and cooperative (supportive) actions must be planned and executed.

ORANGE COUNTY (INFORMAL REVIEW)GENERAL COMMENTS (contd)

15. Further reference is necessary regarding the address of weather conditions and other potential impediments. Additional study and address of significant recurring anomalies (e.g., Santa Ana winds and fog) is suggested.

16. Further address of notification techniques should include consideration of use of TV crawls, maps for the hearing impaired, or closed captioning.

17. A clarification of the State and county functions throughout the emergency response effort is required. Monitoring and sampling, media coordination, and protective response support and decision-making are not considered to be adequately addressed.

18. Although each plan did contain a table of contents, a cross-reference to the criteria contained in NUREG 0654/FEMA REP-1 was not included. (Reference page 29, J.)

19. Annexes or SOP's listed in the table of contents and/or referred to in the plans were not attached or included with the plans for review.

20. There was no reflection of agreement regarding the IAEP, nor of any consideration of other jurisdictional cooperative planning or assistance in the plans.

21. Procedures for acquisition of potassium iodide (KI) must be addressed in the plans. Only mention of quantities for emergency worker use was made without explanation of source or distribution techniques.

22. Statements were found in all the plans reflecting some other agency being tasked for support while there was no evidence that written agreements were made or concurred in.

23. All of the RAC members felt that the IAEP should be turned into a cooperative agreement. It is suggested it be used as a foundation to development of a single integrated operations plan. This would be similar to the "operational area" concept and would be much more cost effective.

ORANGE COUNTY (INFORMAL REVIEWGENERAL COMMENTS (contd)

24. SOP's were missing from all plans.

25. The complex interagency meteorological observations and assignments should be clearly identified. One meteorological voice should support the whole response. The almost complete lack of meteorological understanding in the plans raises grave concern since evacuation hinges so completely on it. The meteorological information sheet (included in all plans) does not clearly spell out where the observations are being taken, at what level, and at what time(s). What about nearby observations? Also, evacuation routes and times are apparently based on some "normal" weather condition. But by definition "normal" is simply the combined effects of variations from normal. So evacuation routes as shown may prove to be unusable in the event of an incident.

26. NOAA Weather Radio (NWR) is a secondary warning dissemination device. However, assuming the planning zones extend over water, NWR is a very viable part of marine warning dissemination and should be considered in all plans.

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SAN DIEGO COUNTY

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EVAL. CRITERIA ELEMENT

COMMENT

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| C.3 | No identification of radiological laboratories and their capabilities. This criteria (C.3) applies to local jurisdictions in light of assumed monitoring duties. |
| C.4 | The plan describes what others are to do, but does not address letters of agreements; no nuclear facilities, private or educational, are identified. |
| D.4 | Suggest further identification of tasking be reflected here or in support plans. |
| E.5 | The system for disseminating emergency information identification of media team needs further clarification. On page XV-2, reference is made to the "media team." This team should be better identified concerning the specific responsibility of a team leader (or PIO) and what constitutes the team, its duties, location, etc. |
| E.7 | There were no public instructions on ad hoc respiratory protection; e.g., handkerchief over mouth, thyroid blocking or evacuation. |
| F.1c | No reflection was made regarding a back-up communications system, other than telephone, to the Federal Emergency Response Team (DOE, NRC ??). |
| F.1e | It did not appear clear as to whom ODP should notify after the receipt of SONGS' alert. |
| G.1 | Public and emergency information does not provide for the special needs of the handicapped. |

SAN DIEGO COUNTY (INFORMAL REVIEW)

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| G.2 | Public information material should be distributed annually. |
| G.3a | See E.5 comments. |
| H.11 | Appendix for emergency kits does not appear to be completed; i.e., communication equipment, radiological monitoring field team equipment, etc., are not addressed. |
| I.8 | The plan designated State and Federal as responsible for this element, but there are no agreements shown. A capability for making rapid assessments is not shown to exist. Clarification is needed to allow county decision-making to occur effectively, and to identify county Radmon team's function, source, procedure, requirements, etc. |
| I.11 | Although this criteria element in NUREG 0654/FEMA REP 1 is not listed as applicable to local level, either California or the County must ask for Federal assistance. The plan does not identify whose responsibility it is to request Federal assistance, where necessary. |
| J.2 | Some identification of provisions is needed. |
| J.10a | Maps in the plan show evacuation routes, evacuation areas, reception centers, but the radiological sampling and monitoring parts are not shown. |
| J.10f | The plan does not reflect the required specific information. |
| J.10i | The plan does not show projected traffic capacities. |

SAN DIEGO COUNTY (INFORMAL REVIEW)

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- J.10k The plan makes no provisions for decision-making factors to carry out the evacuation successfully.
- J.10l A minority opinion reflected that the same time estimates are given for Orange County and the Interagency Agreement and Evacuation Procedures. The terrain, roadways, etc., are identical. CALTRANS and the California Highway Patrol have some concern regarding the estimates.
- J.10m This element, as listed in NUREG 0654/FEMA REP 1, is not listed as an action for "locals," but the California State Plan indicates it is the local's responsibility; therefore, San Diego County may wish to address this element in its plan.
- J.12 Table of Contents for Section VI does not agree with document contents.
- K.3a Suggest an individual be designated the radiation protection officer and be responsible for maintaining personal dose assessment records and assure readings are recorded and maintained.
- K.4 Some added detail is suggested regarding the decision chain for excess exposures to emergency workers.
- L.1 The plan appears to have been written without determining how many contaminated individuals might be involved. One hospital has been designated to be a base hospital and four others are back-up, but their capabilities are not listed. There is an annex (5) to the plan that addresses EMS, but it was not available for review. No information appears regarding training provided; suggest further elaboration in this area. The plan should reflect greater detail regarding the number of patients to be handled and the associated capabilities.

SAN DIEGO COUNTY (INFORMAL REVIEW)

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EVAL. CRITERIA ELEMENT

COMMENT

N.2a	No indication is made to communications relating to field assessment teams.
O.1	The plan broadly covers training--further address is needed to review the EMS SOP. Clarify specific functions and responsibilities.
O.1b	The plan makes training available, but is not specific to each organization. Further address is needed to clarify specific functions and responsibilities.
O.4f & h	Further clarification is needed.
O.5	Further clarification is needed.
P.10	It was not identified who the responsible party is that assures the updating of telephone numbers is accomplished quarterly.

GENERAL COMMENTS

1. Title 17, CAC, Section 30268 was used as supporting 0.5 rem whole body exposure to any individual in any one year (Section 11f1). CAC Title 17 established the administration of radiation protection standards for licensed or registered radiological operations in the State of California. This emergency radiological condition, generated from an NRC licensed facility and as discussed in this plan, might not be in accordance with the intent of Title 17 CAC. Further specification of this and clarification is suggested.
2. "Federal Interagency Radiological Assistance Plan" applies only within the Federal agency community. Federal radiological assistance to State/local governments is provided under the "Radiological Assistance Plan." (Page I-4)
3. Change Section II G4 to read: "Radiological Assistance Plan" for Region 7 of the Department of Energy.
4. Section XI 1B5 (Page XI-2) requires clarification and a reference justifying the statement.
5. Monitoring of evacuees on page XI-2 is provided by the Department of Public Welfare. On page V-2 this responsibility was assigned to the Department of Health. Clarification is necessary.
6. Each sample press release in Attachment B should be labeled or numbered for ease of handling.
7. Some sections of the plan assume an automatic response from the State and Federal governments, other statements indicate the State has primary responsibilities for monitoring, and that the State will request Federal assistance. If assistance is needed, the County Response Official should contact the Department of Energy. In addition, the resources that will be requested should be detailed in the plan; i.e., plume tracking aircraft, radiation monitors, mobile laboratories, etc. Suggest study and clarification of requirements and proper lines of communication.

GENERAL COMMENTS (contd)

8. In the discussion regarding protective actions, the statement is made that coordination of the various jurisdictions will be done before taking any action, but if time does not permit, then the actions will be taken based on the County's authority. These actions should be detailed now in the plan after coordinating with the other jurisdictions so that the actions are discussed and the appropriate action determined. In this way, if time does not allow the various jurisdictions will know the action that will be taken, and that the actions have been considered and the best ones chosen. A letter of agreement would further cooperative decision-making in a timely manner.

9. It is noted that none of the SONGS plans indicate that the Santa Fe railroad is notified. This notification should be provided, perhaps in the same manner as notification to the Coast Guard is provided.

10. Numerous references are made to documents, SOP's, plans, checklists, etc., that are to be developed. No specific dates are identified and much of the critical and decision-making material falls within this set of documents.

11. Page titles, pages, and numerical references are omitted in a number of places (Page XI-7; XIV-3; XI4-4; Attachment A).

12. The general arrangement of the document and its organization reflects redundancy and an inability to address one specific issue in one specific place. Reference to other areas of the plan should be made if the organization of the plan is left the same.

13. There is no coordination of the document with other jurisdictions and little or no reference to joint/cooperative decision-making between major parties; i.e., Counties, City of San Clemente, etc. No coordination of EBS and public information releases is evident.

14. Training management is not reflected and, therefore, offers a potential for redundancy and omissions of continuity of general scope of training.

15. The potential for too great a dependency upon State and Federal response exists. Cooperative response would reduce individual requirements and limit need for support.

GENERAL COMMENTS (contd)

16. References on page V-11, paragraph A1d, refer to "scene" and "on-scene"--- those references being confusing and nonstandard. Further, the "assignments" should be determined in advance of the crisis and equipment issued in an operational state to preclude delays.
17. Activation of the EOC should not be delayed until an "offsite release" as is represented on page V-11, paragraph A1d(3).
18. More specific criteria for actions need to be outlined in the plan. Where appropriate, "mays" should be changed to "will" to reflect development of preplanned actions.
19. Page V-15, paragraph D1 appears to be confusing and needs clarification.
20. Slang terms such as "pulls" in lieu of "performs" should be corrected.
21. Page V-22, paragraph 3, appears to be confusing and does not identify what "support" is to be provided. Suggest clarification.
22. Page VI-2, paragraph D(1), references implementation of the "county emergency warning system." This requires elaboration as to what warning system and whether or not activation is without consideration of other circumstances which might justify not activating the system.
23. Referencing Page VII-1, paragraph B, should be reviewed for clarity, consistency with related paragraphs in the plan, and actions directed without flexibility. Clarification is needed as to the development of other protective action guidelines.
24. Referencing Page XI-1, paragraph A, the pencil type dosimeters should be limited to the CDV-138 (low reading) to be effective. Reference to use of TLD's should also be made.
25. Page V-1--Was consideration given to use of the NOAA Weather Radio for marine notification?

SAN DIEGO COUNTY (INFORMAL REVIEW)

April 1981

GENERAL COMMENTS (Contd)

26. Referencing Page XIII-6--Suggest further elaboration regarding impediments such as Santa Ana winds, fires, and smoke could be impediments to evacuation too. The fog scenario requires elaboration.

27. Reference Figure XIII-4. An alternative routing (east to Arizona border, if necessary) or road closure should be addressed should wind flow so require.

28. Significant concern exists regarding unilateral planning and the lack of cooperative response and coordinated decision-making, both general and specifically regarding public information and dose assessment. Suggest an effort be made by all jurisdictional governments to effect such an effort.

29. Further detail is generally not found to provide confidence that the county has met the requirements of NUREG 0654. Letters of agreement and detailed support of volunteer and/or private, non-governmental agencies (Red Cross, etc.) is not evident.

30. A detailed and preferably cooperative training effort has not been identified to assure a capability to respond effectively to the problem. Further planning and identification of system is suggested.

31. Although each plan did contain a table of contents, a cross-reference to the criteria contained in NUREG 0654/FEMA REP-1 was not included. (Reference Page 29, J.)

32. Annexes or SOP's listed in the table of contents and/or referred to in the plans were not attached or included with the plans for review.

33. There was no reflection of agreement regarding the IAEP, nor of any consideration of other jurisdictional cooperative planning or assistance in the plans.

34. Procedures for acquisition of potassium iodide (KI) must be addressed as well as capability for distribution.

GENERAL COMMENTS (contd)

35. Statements were found in all the plans reflecting some other agency being tasked for support while there was no evidence that written agreements were made or concurred in.

36. All of the RAC members felt that the IAEP should be turned into a cooperative agreement. It is suggested that it be used as a foundation to development of a single integrated operations plan. This would be similar to the "operational area" concept and would be much more cost effective.

37. SOP's were missing from all plans.

38. The complex interagency meteorological observations and assignments should be clearly identified. One meteorological voice should support the whole response. The almost complete lack of meteorological understanding in the plans raises grave concern since evacuation hinges so completely on it. The meteorological information sheet (included in all plans) does not clearly spell out where the observations are being taken, at what level, and at what time(s). What about nearby observations? Also, evacuation routes and times are apparently based on some "normal" weather condition. But by definition "normal" is simply the combined effects of variations from normal. So evacuation routes as shown may prove to be unusable in the event of an incident.

39. NOAA Weather Radio (NWR) is a secondary warning dissemination device. However, assuming the planning zones extend over water, NWR is a very viable part of marine warning dissemination and should be considered in all plans.

APRIL 1981

INFORMAL REVIEW
CITY OF SAN CLEMENTE

NUREG 0654/FEMA REP 1
EVAL. CRITERIA ELEMENT

COMMENT

- | | |
|---------|---|
| A 1e | There does not appear to be any mention throughout the plan of volunteer agencies with disaster responsibilities, i.e., Red Cross. |
| C 1c | There should be more specific identification of support requests to State and Federal governments. Tasking of other jurisdictions to provide support is not recommended unless joint agreements are existent. |
| C 4 | No letters of agreement are included; no nuclear facilities, private or educational, are identified in the plan. |
| D 4 | No procedures have been addressed for other protective actions. |
| E 3 & 6 | No clear definition of tasking and responsibility is evident apparently due to support by Orange County in terms of notification procedures. |
| E 7 | Written messages for all protective actions were not found in the plan. |
| F 1c | The plan did not appear to address communications with Federal response organizations either directly or through the county and state lines of communication. |
| F 2 | Communications with mobile medical support facilities is not clearly described. |

NUREG 0654/FEMA REP 1
EVAL. CRITERIA ELEMENT

COMMENT

- F 3 No indication of periodic testing of entire communications system is indicated--paragraph C5, page VI-5, does not reflect testing of the "entire" system.
- G 1 thru Not observed in the plan. Needs to be developed.
G 4
- G 5 An address of this is suggested and terms of coordination identified if it is to be handled by the County.
- H 3 Organization of the EOC is indicated, however no address of an alternate EOC is made relative to early evacuation and increased radiation levels. The stated exposure level is in conflict with other radiation levels as stated in other areas for emergency workers.
- H 7 There is no radioiodine capability indicated. Air samplers have no mobile power generation capability reflected.
- H 10 Provisions to inspect, inventory, and operationally check emergency equipment instruments at least once each calendar quarter and after each use is not shown in the plan.
- H 11 There is no capability reflected for air sampling. The plan does not reflect a capability for radioiodine sampling.

NUREG 0654/FEMA REP 1
EVAL. CRITERIA ELEMENT

COMMENT

- H 12 Central point for the receipt and analysis of all field monitoring data and coordination of sample media was not evident in the plan.
- I 7 While indirectly addressed, no specific reference to field monitoring description or capability exists.
- I 8 The plan did not provide methods, equipment, and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways.
- J 2 There is no evidence of coordination found in the plan regarding this criteria element.
- J 9 It does not appear that this criteria element is consistent with the Environmental Protection Agency and County criteria.
- J 10a Maps in the plan show evacuation routes, evacuation areas, reception centers, but the radiological sampling and monitoring parts are not shown.
- J 10d No procedures were observed to address volunteers' evacuation or shelter option.
- J 10e The plan indicates that a thyroid blocking agent may be distributed but there is no information on how, why, etc. Suggest further elaboration as to procedures.

NUREG 0654/FEMA REP 1
EVAL. CRITERIA ELEMENT

COMMENT

- J 10f The plan did not reflect inclusion of the method by which decisions by the State Health Department for administering radio-protective drugs to the general population are made during an emergency and the predetermined conditions under which such drugs may be used by offsite emergency workers.
- J 10i Projected traffic "capacities" of evacuation routes under emergency conditions were not shown in the plan.
- J 10k The plan makes no provisions for decision-making regarding potential impediments so as to carry out the evacuation successfully.
- J 10l Not shown.
- J 12 Not shown. A reference to or description of support capability is necessary.
- K 3a Not shown.
- K 3b Not shown.
- K 4 Some question arises regarding the use of extremity dose limits for emergency.
- K 5a Action levels for determining the need for decontamination were not addressed.
- K 5b The plan did not appear to establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments, and equipment, and for waste disposal.

NUREG 0654/FEMA REP 1
EVAL. CRITERIA ELEMENT

COMMENT

- L 4 Arrangements for transporting victims of radiological accidents to medical support facilities were not shown in the plan.
- M 1 No general plan and procedures exist other than a brief address that the need for recovery and reentry planning is to be accomplished. NEST was named as the Federal radiological assistance team in various places. NEST is not necessarily the team the Department of Energy will provide to support local/State governments in the case of a nuclear power plant emergency. All references to NEST should be deleted in this plan and reference made to DOE.
- N 1a and b Exercises and Drills criteria were not shown in the plan.
2a - c
3a - f
4
5
- O Radiological Emergency Response Training criteria were not shown in the plan.
- P Planning Effort criteria was not shown in the plan.

GENERAL COMMENTS

1. This plan, along with Orange County and other jurisdictional plans, reflects a serious shortfall in coordination regarding cooperative response. Because the City does not have the resources to carry out action it might decide to undertake, it must depend on County, State, and Federal resources. If an emergency should occur at SONGS, the necessary requested resources would also be required and requested by others. Thus, a decision made by the City could adversely affect unincorporated areas of the County and possibly another city, San Juan Capistrano. Rather than effect separate isolated planning efforts, a cooperative approach to plans and response is suggested. This should be reflected by an agreed upon and mutually supportive (concurred in) plan.

It is recommended that the City obtain written agreement with Orange County that in the event of an emergency no protective action other than those actions planned and supported by the County plan will be taken, i.e., alerting and sheltering but that no evacuation would be announced until ordered by the authorized County official.

This plan should be considered as possibly becoming a Standing Operating Procedure (SOP) for the City which details the resources available to the County for assistance, coordination, and control of certain activities (in the City).

2. The California Administrative Code Title 17 was used as reference for exposure guidelines. Since Title 17 applies to routine, licensed operations, it is questionable whether Title 17 applies in an emergency.
3. Notwithstanding that stated purpose in criteria element A 2, the caveat (3) in the February 17, 1981 Letter of Transmittal from Mr. Carvalho, questions the plan's effectiveness, nothing can "guarantee" an evacuation under all circumstances, nor does current guidance so limit protective action decision making. Equal review and consideration should be given to all protective actions.

GENERAL COMMENTS (CONTINUED)

4. Some specific reflection should be made on the status of the resources referred to in the plan and the Letter of Transmittal.
5. Considerable concern exists as to the advisability of using the EOC as an EOF (interim or permanent). Priorities, staffing, jurisdictional competition and physical conditions are placed in jeopardy. A re-review of this action is recommended, keeping in mind the need for all jurisdiction priorities and any historical precedent that might be appropriate.
6. A clarification of source, make-up, requirements and equipment for mobile monitoring teams is recommended. Also, an address of the specific relationships of state and utility teams and operating responsibilities is needed.
7. Letters of Agreement with any and all parties outside City authority are necessary.
8. Public Information issues need further address, especially regarding joint/cooperative coordination of releases amongst jurisdiction.
9. Although each plan did contain a table of contents, a cross-reference to the criteria contained in NUREG-0654/FEMA REP-1 was not included. (Reference page 29, J.)
10. Annexes or SOP's listed in the table of contents and/or referred to in the plans were not attached or included with the plans for review.
11. There was no reflection of agreement regarding the IAEP, nor of any consideration of other jurisdictional cooperative planning or assistance in the plans.
12. Procedures for acquisition of potassium iodide (KI) must be addressed as well as distribution.

GENERAL COMMENTS (CONTINUED)

13. Statements were found in all the plans reflecting some other agency being tasked for support while there was no evidence that written agreements were made or concurred in.
14. All of the RAC members felt that the IAEP should be turned into a cooperative agreement. It is suggested it be used as a foundation to development of a single integrated operations plan. This would be similar to the "Operational Area" concept and would be much more cost effective.
15. SOP's were missing from all plans.
16. The complex interagency meteorological observations and assignments should be clearly identified. One meteorological voice should support the whole response. The almost complete lack of meteorological understanding in the plans raises grave concern since evacuation hinges so completely on it. The meteorological information sheet (included in all plans) does not clearly spell out where the observations are being taken, at what level, and at what time(s). What about nearby observations? Also, evacuation routes and times are apparently based on some "normal" weather condition. But by definition "normal" is simply the combined effects of variations from normal. So evacuation routes as shown may prove to be unusable in the event of an incident.
17. NOAA Weather Radio (NWR) is a secondary warning dissemination device. However, assuming the planning zones extend over water, NWR is a very viable part of marine warning dissemination and should be considered in all plans.

APR 1981

SAN JUAN CAPISTRANO

The RAC has conducted an informal review of the San Juan Capistrano Plan.

Its findings reflected that 0654 criteria were inappropriate to review the plan. Consequently, the RAC reviewed the plan on a general basis and its findings are reflected in that manner. The principle tenets of 0654 criteria were applied where appropriate.

The RAC considerations and resultant conclusions reflected one primary concern, that of the need for cooperative planning and response amongst all the related jurisdictions around SONGS. San Juan Capistrano's capability to support 0654 criteria reflected the very obvious need for cooperation, as lack of staff support and capability inherent to its primary mission precludes identification as a separate entity capable of full 0654 criteria response. The RAC strongly suggests the city planning effort be integrated into the Orange County Response Plan as a sub-part. The County should, in turn, assume responsibility for support of the city jurisdiction, and a cooperative planning effort conducted to provide the response/protection called for in the planning requirement. Further coordination, prior to future planning efforts, should be effected between the State of California OES, the City, and Orange County to attempt to reach a more efficient and cooperative solution to this planning effort.

The above planning effort notwithstanding, the RAC review did reflect the findings addressed, as attached.

APRIL 1981

INFORMAL REVIEW

SAN JUAN CAPISTRANO

Following are some general comments by the RAC:

1. The plan required extensive expansion of subject and details. Where authority or responsibility is delegated there is no explanation of duties, transfer of authority, or assumption of same.
2. The plan does not address State, Federal, and private organizations that are part of the response organization.
3. The plan does not clearly define the concept of operations nor its relationship to the total effort, i.e., what city will do versus county, State and Federal.
4. There is no reference made of the availability or use of an alert notification system.
5. The plan does not identify clearly what the method, procedure, or physical means are for providing instructions to the public. There is a need to describe who, what, how of these issues. Who are the liaison personnel and where do they function (EOF, EOC)? Is the City Manager an RDO? Will he "assess information" or direct others? Where are the offsite monitors identified in the plan?
6. The plan should state what the system and procedures are for notifying the public.
7. The following criteria elements of NUREG 0654/FEMA REP 1 were not shown or addressed in the plan:
 - F - Emergency Communications
 - K - Radiological Exposure Control
 - N - Exercises and Drills
 - O - Radiological Emergency Response Training
 - P - Planning Effort

INFORMAL REVIEW (CONTINUED)

8. If appropriate, the plan should identify that the Orange County Emergency Response Plan's Information Annex applies to the jurisdiction and at least once a year a coordination meeting between PIO's will be held to discuss, review, and update information plans.
9. Child thyroid exposure limit was stated as 25 mrem. This number appears to be below other accepted quantities. It is suggested a review of these figures be made and that they be in accord with EPA, Orange County, and State of California guidance.
10. Although the plan did contain a table of contents, a cross-reference to the criteria contained in NUREG-0654/FEMA REP-1 was not included. (Reference page 29, J.)
11. Annexes or SOP's were needed but were not attached or included with the plans for review.
12. There was a lack of reflection of agreement regarding the LAEP in the plans, although it was addressed as being a county document. There was no consideration of other jurisdictional cooperative planning or assistance.
13. Procedures for acquisition of Potassium Iodide (KI), must be addressed as well as the capability for distribution to both emergency workers and general public. No discussion was evident.
14. Statements were found in all the plans reflecting some other agency being tasked for support while there was no evidence that written agreements were made or concurred in.
15. All of the RAC members felt that the LAEP should be turned into a cooperative agreement. It is suggested it be used as a foundation to development of a single integrated operations plan. This would be similar to the "Operational Area" concept and would be much more cost effective.

INFORMAL REVIEW (CONTINUED)

16. SOP's were missing from all plans.
17. The complex interagency meteorological observations and assignments should be clearly identified. One meteorological voice should support the whole response. The almost complete lack of meteorological understanding in the plans raises grave concern since evacuation hinges so completely on it. The meteorological information sheet (included in all plans) does not clearly spell out where the observations are being taken, at what level, and at what time(s). What about nearby observations? Also, evacuation routes and times are apparently based on some "normal" weather condition. But by definition, "normal" is simply the combined effects of variations from normal. So evacuation routes as shown may prove to be unusable in the event of an incident.
18. NOAA Weather Radio (NWR) is a secondary warning dissemination device. However, assuming the planning zones extend over water, NWR is a very viable part of marine warning dissemination and should be considered in all plans.

APR 1980

INFORMAL REVIEW
U. S. MARINES CORPS

NUREG 0654/FEMA REP-1
EVAL. CRITERIA ELEMENT

COMMENT

- | | |
|------|--|
| A 2a | Annexes G, H, I, J, were not included in the plan and therefore could not be addressed. This jeopardized the review regarding a number of criteria items. Also Public Health, Sanitation, and Law Enforcement were not addressed. |
| C 4 | Since the annex to this element was not attached to the plan there was insufficient information to evaluate. |
| D 4 | Actions did not appear to be consistent with the emergency actions recommended by the nuclear facility licensee. |
| E 6 | Reference Note 1, page K-3-B-2--There is no information herein referencing siren coverage or control except that it won't cover Dana Point. Siren signal appears to be different from other plans and requires a coordinated agreement and public information so as to preclude confusion. |
| E 7 | Annex H not submitted for review. |
| F 1c | Annex J not submitted for review. |
| F 2 | Medical teams do not appear to have telecommunications. |
| F 3 | Annex J not submitted for review. |
| H 10 | Schedule is not shown for inspecting, inventoring, and operationally checking emergency equipment/instruments. |
| H 11 | Air sampling capability is not described in detail. |
| I | Spot sample and continuous sample are identically defined. The basis of the 30 minute sample was not discussed. (Page K-3-D-(2)-1). Since no portable electric generator is listed as equipment, concern exists as to how the staplex will be energized in the field. (Page B-2-9.) Filter medium, Whatman #41, is good for particulate sampling but will not be adequate for gaseous radioiodine. |

NUREG 0654/FEMA REP-1
EVAL. CRITERIA ELEMENT

COMMENT

I 7	Assignment is made but the number of monitors is not clear.
I 8	No iodine sampling capability nor analytical or assessment capability were reflected in the plan.
J 10a	Maps in the plan show evacuation routes, evacuation areas, reception centers, but the radiological sampling and monitoring parts are not specifically reflected.
J 10b	Maps showing population areas around the nuclear facility are not shown.
J 10e	Some questions arose on 5 rem exposure and potassium iodine use. These should be addressed as a peacetime action as opposed to standards appropriate to a military conflict.
J 10f	Use of KI should be addressed. If KI is to be applied, procedures for acquisition must be evident. NRMC should replace State Health Department as the point of reference.
J 10i	Projected traffic capacities were not shown.
J 10m	Suggest this issued be addressed in light of unique authority of military installation.
K 3b	Element addressed but not correct for frequency.
K 5b	No waste disposal or procedure is indicated.
L 1	Annex I not submitted for review.
M 1	There was no plan or procedure for reentry and recovery; no decision maker identified for reentry; no basis for relaxing protective measures.
N 2a	Annex J not submitted for review.
O	Annex D not submitted for review.

U. S. MARINE CORPS (INFORMAL REVIEW)

GENERAL COMMENTS

1. Reference Page B-1, Section 1a--Clarification is needed as to what is "emergency operations?"
2. Reference Page B-4-3, Section 4, Appendix 4--"Site Emergency" initiates evacuation and it is to be completed by the declaration of a General Emergency. What if there is no recommendation for evacuation, based on monitoring results? This presents serious concern in light of hazards created to public if evacuation is inappropriate.
3. Reference Page K-3-2, Section 3-3d--What is the basis for directing that reoccupation will be 24-72 hours?
4. Reference Page K-3-2 Section Appendix 3g--Releases from SONGS may be for days, not a "short period of plume passage."
5. Reference Page K-3-A, Enclosure 4-3g--What is the basis for 5 RAD/hr? This dose rate appeared excessive.
6. Reference Page K-3-D-10-1--In the discussion under "Caution" 5 rad/hr required withdrawal from the gate. Withdrawal should begin at 100 rad/hr. or preferably at even a lower dose rate.
7. Reference Page K-3-D-(2)-1--Spot sample and continuous sample was not discussed.
8. Reference Page K-3-D-20-1--The basis of the 30 minute sample was not discussed.
9. A significant concern exists in the lack of written agreements between the local governments, State governmental agencies, and the U. S. Marine Corps. There should be a definite commitment of cooperative team response necessary to carry out assignments such as evacuation of beach areas, roadblock manning, and monitoring. Additional resources that would be available upon request should be listed.
10. The plan lacks maps that are satisfactory to determine location and distances from SONGS. There is no map of the Marine Corp facility showing housing, headquarters, field training areas, etc.
11. EOC operations are mentioned but there is no mention of input to the near-site EOF. All monitoring information must go to the EOF. If it must first go to the Marine Corps Commander, the purposes of monitoring are not being met and the "public" is not being served. A coordinated and cooperative effort is needed to reduce total requirements and effectively handle the problem.

12. There appears to be some clarification needed regarding the meaning of the four classifications: the relationship between military and local government public affairs officers; the relationship between Camp Pendleton and off-base protective action guides; and the persons (title) actually making the various decisions. For instance (Page K-3-A-(4)-1), all personnel...in the evacuated area...radiation exposure does not exceed three REM. Order the evacuation of all personnel...evacuate... 5 RAD/hr. Who issued this order and who can countermand it? On page K-3-C-12, 4a, b, and c are all higher exposures. Item 5c says 3 REM can be exceeded if justified. Who justifies?

13. There is some concern as to actual U. S. Marine Corps commitments and showing that those resources can be committed regardless of the status of the Marine Base. Camp Pendleton has a very specific mission and the fulfillment of that mission may dictate a response that differs from the population in the surrounding area. Agreements with local governments provide a means of documenting these differences. They should be identified and developed.

14. The stated EPA's PAG's are considered correct PAG's for the U. S. Marines use; however, it is not clear that it is understood that the EPA PAG's are not used by the State or the utility. Thus, a conflict in decision making could result in confusion if coordination and understanding do not exist. Who decides the action to be taken and is the necessary information provided, (i.e., projected exposures) in a coordinated fashion.

15. The U. S. Marine Corps PIO should interface with the joint public affairs officer when planning radio and TV releases. All public information is to be controlled by local or State (radio and TV). Base released would require coordination which is not reflected.

16. It is suggested that the EOC Liaison Officer be identified.

17. Reference Page K-3-B-2--Sirens--Four short blasts for 30 minutes is in conflict with otherwise standard use of the civil defense siren (steady tone). That siren's sole purpose is notification regardless of the crisis. Suggest this be changed to agree with other offsite jurisdictional use.

18. Some concern exists regarding the six hour evacuation time stated. For the numbers involved it would appear that may be excessive.

19. Reference Page K-3-C-2, paragraph 5d--Question exists as to the rationale of these figures. Clarification is suggested.

20. Reference Page K-3-D-1--While the capability of radiation detection instruments (range) were given, the capability of air samplers or the AN/PDR-27J were not detailed, i.e., what filters are used, etc. Some question exists that the O-200 MR instrument will measure small increases in background.

21. Reference Page K-3-D-1. Not consistent with classification terminology. "Plant Emergency" is not a classification. Also, the "Alert" notification is supposed to activate an EOC and require assembly of personnel.

22. The number of trained monitors was not identified nor their training standards or frequency. Some elaboration is suggested.
23. Reference Page K-3-D-(2)-1, paragraph 3--Question arises as to the air sample analysis done and to what degree can air filter analysis determine the hazard?
24. Suggest review of call signs to eliminate confusion that might arise in similar call signs, (e.g., Faulty Device Red and Faulty Device Red 500).
25. Reference Pages K-3-B-1 to 3--Evacuation routes appear to be fixed regardless of wind direction and do not reflect clearly without a map.
26. Although each plan did contain a table of contents, a cross-reference to the criteria contained in NUREG-0654/FEMA REP-1 was not included. (Reference page 29, J.)
27. Annexes or SOP's listed in the table of contents and/or referred to in the plans were not attached or included with the plans for review.
28. There was no reflection of agreement regarding the LAEP, nor of any consideration of other jurisdictional cooperative planning or assistance.
29. Procedures for acquisition of Potassium Iodine (KI) must be addressed as well as the capability for distribution to both emergency workers and general public. A detailed discussion was not evident.
30. Statements were found in all the plans reflecting some other agency being tasked for support while there was no evidence that written agreements were made or concurred in.
31. All of the RAC members felt that the LAEP should be turned into a cooperative agreement. It is suggested it be a foundation to development of a single integrated operations plan. This would be similar to the "Operational Area" concept and would be much more cost effective.
32. SOP's were missing from all plans.
33. The complex interagency meteorological observations and assignments should be clearly identified. One meteorological voice should support the whole response. The almost complete lack of meteorological understanding in the plans raises grave concern since evacuation hinges so completely on it. The meteorological information sheet (included in all plans) does not clearly spell out where the observations are being taken, at what level, and at what time(s). What about nearby observations? Also, evacuation routes and times are apparently based on some "normal" weather condition. But by definition "normal" is simply the combined effects of variations from normal. So evacuation routes as shown may prove to be unusable in the event of an incident.

34. NOAA Weather Radio (NWR) is a secondary warning dissemination device. However, assuming the planning zones extend over water, NWR is a very viable part of marine warning dissemination and should be considered in all plans.

APR 1981

INFORMAL REVIEW
SAN ONOFRE, SAN CLEMENTE AND
DOHENY STATE PARK AND BEACH AREAS

The RAC has conducted an informal review of the State Parks and Beaches Plan. Its findings reflected that NUREG 0654 criteria were inappropriate to review the plan. Consequently, the RAC reviewed the plan on a general basis and its findings are reflected in that manner. The NUREG 0654 criteria were applied where appropriate.

The RAC considerations and resultant conclusions reflected one primary concern, that of the need for cooperative planning and response amongst all the related jurisdictions around SONGS. State Parks capability to support 0654 criteria reflected the very obvious need for cooperation, as lack of staff support and capability inherent to its primary mission precludes identification as a separate entity capable of full 0654 criteria response. The RAC strongly suggests the State Parks planning effort be integrated into the State response Plan as a sub-part, and/or that its response capability be further integrated into the Orange County response effort. The county should, in turn, assume responsibility for support of State Parks jurisdictions, and a cooperative planning effort conducted to provide the response/protection called for in the planning requirement. Further coordination, prior to future planning efforts, should be effected between the State of California OES, State Parks and Beaches, and Orange County to attempt to reach a more efficient and cooperative solution to this planning effort.

The above planning effort notwithstanding, the RAC review did reflect the findings addressed below:

1. Attachment C, page VIII-E--The system for notifying public does not identify time required. It is recommended that they relay information to County PIO to include evacuation information to media so as to cover occupants or State beaches.
2. Information should be coordinated annually. More information on protective measures and bilingual information as well as information for handicapped should be posted. (Page VIII-E-1.)

3. Pages III-C, VI-B, VIII-E-2-- The Spokesperson was not identified. Is it the regular director, and if so where is he/she located?
4. Page IV, Attachment C--No map of reception centers is included in Attachment D as indicated in V-4.
5. Page V-A,B,C, & D--No map was found, rather a written instruction on evacuation route information. No provisions for vehicles to transport people were identified.
6. Page V-3, Attachmend D--No maps and no mileage distances were shown.
7. No detailed method of obtaining medical and transportation assistance.
8. The alert of supporting maintenance services was not described. Call-up and telephone numbers of primary Park Services personnel was not shown.
9. The purpose of the plan is to clear and secure the beach areas and park during and following an accident at San Onofre. It does not or should not contain Emergency Medical Service activity planning due to the limited capability and nature of operations.
10. Page VIII-1--NOAA Weather Radio alerting or special radio alerting would probably be superior to telephone notification.
11. Page VIII-8--Preprinted handbills distributed just before an evacuation seems impractical. Use of loudspeakers and sweep procedures would be better or use of NOAA Weather Radio as a dissemination vehicle (especially for mariners).
12. Pages B-23 and B-24--Will local officials understand this sheet? For example, what does wind direction persistence or stability class mean? At what level(s) are these observations taken? What about nearby sites?
13. No maps were found showing evacuation routes.
14. Significant work is needed to bring the plan up to 0654 criteria. Alternative cooperative planning is recommended as a more cost effective and judicious resolution to reaching emergency protective measures.
15. Although each plan did contain a table of contents, a cross-reference to the criteria contained in NUREG-0654/FEMA REP-1 was not included. (Reference Page 29, J).
16. Annexes or SOP's listed in the table of contents and/or referenced to in the plans were not attached or included with the plans for review.
17. There was no reflection of agreement regarding the IAEP, nor of any consideration of other jurisdictional cooperative planning or assistance in the plans.
18. Statements were found in all the plans reflecting some other agency being tasked for support while there was no evidence that written agreements were made or concurred in.

19. All of the RAC members felt that the IAEP should be turned into a cooperative agreement. It is suggested it be foundation to development of a singled integrated operations plan. This would be similar to the "Operational Area" concept and would be much more cost effective.
20. SOP's were missing from all plans.
21. The complex interagency meteorological observations and assignments should be clearly identified. One meteorological voice should support the whole response. The almost complete lack of meteorological understanding in the plans raises grave concern since evacuation hinges so completely on it. The meteorological information sheet (included in all plans) does not clearly spell out where the observations are being taken, at what level, and at what time(s). What about nearby observations? Also, evacuation routes and time are apparently based on some "normal" weather condition. But by definition "normal" is simply the combined effects of variations from normal. So evacuation routes as shown may prove to be unusable in the event of an accident.
22. NOAA Weahter Radio (NWR) is a secondary warning dissemination device. However, assuming the planning zones extend over water, NWR is a very viable part of marine warning dissemination and should be considered in all plans.

INFORMAL REVIEW

INTERAGENCY AGREEMENT AND EVACUATION PROCEDURES (IAEP)

December 1980

The FEMA Region IX Regional Assistance Committee (RAC) has conducted an informal review of the IAEP plan. Its findings reflected the NUREG 0654/FEMA REP-1 criteria were inappropriate to review the plan. Consequently, the RAC reviewed the plan on a general basis and its findings are reflected in that manner. The principle tenets of NUREG 0654/FEMA REP-1 criteria were applied where appropriate.

The RAC considerations and resultant conclusions reflected one primary concern, that of the need for cooperative planning and response amongst all the related jurisdictions around the San Onofre Nuclear Generating Station (SONGS). The RAC strongly suggests the planning effort be integrated into one Response Plan using the IAEP as a basis for work and development into a single integrated plan for all-jurisdiction use.

Further coordination, prior to future planning efforts, should be effected between the State of California Office of Emergency Services (OES), FEMA Region IX, and the local jurisdictions to attempt to reach a more efficient and cooperative solution to this planning effort.

The above planning effort notwithstanding, the RAC review did reflect the findings addressed below:

1. Page I-1--numerous objectives are specified, but actual procedures need to be included in the Operating Plan. Item 12...evacuation assessment offers an example. What will determine evacuation? What route(s) will be used? What happens if there is an accident or other reason for a road closure? These need to be determined beforehand as opposed to during the event.
2. Page III-6, Item 12--what is the "public notification system"? Items 12, 13, and 14...How will people know to listen to their radio and television? Sirens may be okay in some areas, but NOAA Weather Radio could be utilized as well. Will all media outlets have evacuation maps at their disposal? Will television stations have maps suitable for broadcast? What about the hearing impaired? Will there be crawls or closed captioning?
3. The plan did not identify time required for notification to the public.
4. The plan did not identify that dissemination of information was to be accomplished annually.
5. Identical evacuation time estimates for Orange and San Diego Counties as reflected have caused concern to CALTRANS and the California Highway Patrol. A coordinated planning effort to get all parties involved is needed to resolve criteria element J 10 1, page V-1, in the plan.

6. In all the local/county radiological response plans to nuclear emergencies from SONGS, there are two areas which were not developed and, perhaps, may be addressed in an interagency agreement. These areas are:

a. After the evacuation of the concerned public, an administrative approval system should be established for emergency personnel to enter or be in secured and radiation or contaminated areas. This will minimize the delay to emergency workers at roadblocks and from roving security patrols.

b. Each agency or group of agencies with the requirement to enter the radiation/contamination area should establish a Radiation Protection Officer (RPO). The responsibility of the RPO is to administer proper radiation control for his personnel. Among his functions will be knowing the task of each member of his team sent into the radiation area, designating the safest route for the team to travel and return, the location of the task, the time for the team to return and the projected exposure to the team, and after the task, assuring by dosimetry that personnel were exposed not beyond the established administrative limit. Also, the RPO might have to recall the team if radiological conditions become more hazardous or institute rescue efforts if the team does not respond to the return time. The RPO might be given the function of evaluating and processing approval to individuals to receive up to 25 rem for life-saving purposes.

7. Reference Page IV 9 and 10--unless agreements have been initiated with the U.S. Coast Guard, U.S. Immigration Service Border Patrol, and Federal Marshall Service, the actions described might not evolve.

8. Reference Page I 1, Section I-A--it is suggested the plan be changed to read "...from threatened or contaminated areas to limit radiation exposure and...."

9. Reference Page VII 21, Section VII-C 1--the area monitoring should be coordinated and dispatched from a central point, preferably from the EOF. It appeared that the monitoring teams from various groups would be surveying areas without coordinated instructions on the type and location of contamination. After the survey, the communication lines could be flooded with monitoring results which may or may not be useful, and if relayed through the EOF's could slow down transmission to the EOF for consideration and use.

10. Reference Page VII 22, Section VII-D--an authorized reentry procedure for personnel should be established, as discussed in paragraph 6 above.

11. Reference Table 14--there was a question as to the statement "Radiation Exposure of 0.25 as 1 inch." Suggest review and clarification.

12. In Section VIII the plan addresses "bedridden" persons. Ambulance companies (plan does not identify which or how many) will relocate a minimum of 364 institutionalized patients to four area hospitals. The plan says nothing about people who may be bedridden, but are not in institutions. Not all patients in rest homes or convalescent hospitals will require ambulance transportation. While preparation may be being provided, it should be reflected in the plans. A number of questions remain, such as:

- a. How many ambulances would the task require?
- b. Where will required manpower support come from to move patients?
- c. What are the alternatives to patient transfer, i.e., protection, KI, etc.?

13. Emergency medical care responsibility is assigned to the Orange County Paramedic Units and the Orange County Health Department. Paramedic Units do not have and/or carry such responsibility. It should be simply stated that the responsibility for Emergency Medical Service is Orange County's as written in the Orange County plan.

14. Reference Page IV 9--NOAA Weather Radio can be a useful supplement for marine notification.

15. Reference Page V 1--the times noted are subject to wind speed and direction at the time of the incident. Evacuation routes are dependent upon weather factors and should not be treated as absolute.

16. Reference Page IX 3--pre-emergency education does not cover transients. Newspapers could play a major role in pre-disaster reduction. Suggest reference to this source be made.

17. Although each plan did contain a table of contents, a cross-reference to the criteria contained in NUREG 0654/FEMA REP-1 was not included. (Reference page 29, paragraph J.)

18. Annexes or SOP's listed in the table of contents and/or referred to in the plans were not attached or included with the plans for review.

19. There was no reflection of agreement regarding the IAEP, nor of any consideration of other jurisdictional cooperative planning or assistance. The plan should have a page of authority lines/signature blocks attesting to acceptance and concurrence in the document. Only San Juan Capistrano reflected formal adoption of the IAEP.

20. Statements were found in all the plans reflecting some other agency being tasked for support while there was no evidence that written agreements were made or concurred in.

21. All of the RAC members felt that the IAEP should be turned into a cooperative agreement. It is suggested it be used as a foundation to development of a single integrated operations plan. This would be similar to the "Operational Area" concept and would be much more cost effective.

22. The RAC was concerned over the statement of numerous parties incident to the planning effort that this was an evacuation plan, yet there exists rather brief but definite address of Monitoring Procedures, Alerting, Public Information, etc. If this is to be an evacuation procedure, it should be limited only to evacuation actions, and in the degree of detail and specificity of an operating procedure rather than a plan.

23. The complex interagency meteorological observations and assignments should be clearly identified. One meteorological voice should support the whole response. The almost complete lack of meteorological understanding in the plans raises grave concern since evacuation hinges so completely on it. The meteorological information sheet (included in all plans) does not clearly spell out where the observations are being taken, at what level, and at what time(s). What about nearby observations? Also, evacuation routes and times are apparently based on some "normal" weather condition. But by definition "normal" is simply the combined effects of variations from normal. So evacuation routes as shown may prove to be unusable in the event of an incident.

24. NOAA Weather Radio (NWR) is a secondary warning dissemination device. However, assuming the planning zones extend over water, NWR is a very viable part of marine warning dissemination and should be considered in all plans.

RELATED CORRESPONDENCE

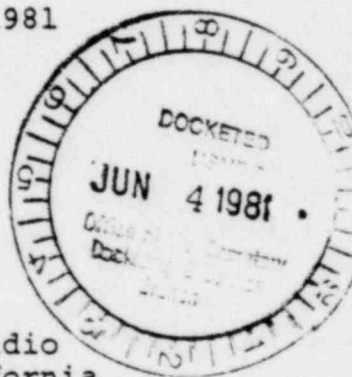
PUBLIC MEETING BEFORE
FEDERAL EMERGENCY MANAGEMENT AGENCY

SAN ONOFRE NUCLEAR GENERATING STATION
OFFSITE EMERGENCY RESPONSE PLAN

Monday, May 18, 1981
7:00 P.M.

Held at

City Hall
100 Avenida Presidio
San Clemente, California



Reporter: Martha Loggins, CSR #5145

8106080362

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MACAULEY, BARRETT, CRAM, DAWSON & MELMAN

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1 MR. MANDA: Ladies and gentlemen, on behalf of the
2 Federal Emergency Management Agency, I want to welcome you
3 to this public meeting. My name is Frank Manda. I am the
4 Acting Director of the Federal Emergency Management Agency.

5 To make things a little simpler for you this
6 evening, we will refer to the Agency as FEMA from now on.

7 The purpose of this meeting is to acquaint
8 the public with the state and local offsite response plans,
9 to answer your questions about the FEMA review process and
10 to receive comments from the public on the plans and
11 preparedness of the state and local governments.

12 I want to introduce you to the players before
13 we get started. The chief players are sitting in the front
14 row. Jack Kearns, representing the Office of Emergency
15 Services. Jack is the Deputy Director of OES.

16 For the City of San Clemente, Ron Coleman.
17 Representing Orange County, Burt Turner;
18 San Diego County, Jim Hunt; City of San Juan Capistrano,
19 Cynthia Ferguson; U.S. Marine Corps from Camp Pendleton,
20 Colonel Phillip Dooley.

21 Representing State Parks and Beaches, Harold
22 Doerksen.

23 We also have representatives from Southern
24 California Edison who are available to answer questions.

25 I'd like to invite your attention to the
26 agenda that has been passed out and request that we do get

1 your cooperation in sticking to the agenda tonight. We have
2 quite a heavy program here, and if we can stick to the
3 agenda, I think we'll accomplish the business at hand.

4 Sitting here with me at the table on my right
5 I have Ron Sandwina who is the Director of Plans and
6 Preparedness Division in FEMA in San Francisco.

7 On my left I have -- I can't even think of
8 his name. I have only known him for several years -- Ken
9 Nauman, who is the Chief Evaluator for the exercises that
10 we have just conducted here at San Onofre.

11 Ron Sandwina will be the moderator for the
12 program this evening; and, of course, he and Ken will be
13 available to answer all of your technical questions.

14 So, I will turn it over to Ron Sandwina.

15 MR. SANDWINA: Thank you, Frank. Good evening,
16 ladies and gentlemen.

17 I would like to outline for you, I think, a
18 process that we will use this evening. There are quite a
19 few people that I am sure want to provide input; and in order
20 to accommodate as many different inputs as possible during
21 the public comment section of this meeting, I'd like to ask
22 that you limit your input to three minutes, and we will have
23 an opportunity then for one or two clarifying comments from
24 any others from the audience that might wish to respond to
25 questions and so forth.

26 Now, to start out, we will have a presentation

1 of several different things: The FEMA review process as we
2 see it, the status of plans and the recently-completed
3 exercise that was conducted here. We will have an FEMA
4 official, the Project Officer, Ken Nauman, address you on
5 those things. Then, that would be followed by the individual
6 presentations of the plans of the state and local jurisdic-
7 tions that are involved with the offsite emergency planning.

8 I have asked them to try -- and this is a very
9 difficult thing to try -- to present to you an oversight of
10 their plan in about five minutes. We will entertain, follow-
11 ing that, and following each of those presentations, one or
12 two points of clarification. I think if we can sort of go
13 along with that process, then we'll get through those
14 presentations and get into the public comment part of this
15 meeting. That will afford all of you an opportunity to
16 provide your input.

17 So with that, I'd like to turn the session
18 over to Ken Nauman, Project Officer for San Onofre Emergency
19 Planning.

20 MR. NAUMAN: Thank you, Ron.

21 Just to briefly cover our review process, we
22 have two regional reviews that take place. One is the plan
23 review that is conducted by the FEMA Regional Assistance
24 Committee and, secondly, the review of the total program by
25 the FEMA Region IX Director. The former of the two consists
26 of the RAC team which is made up of Federal Agency

1 representatives from the Health and Human Services, the
2 Department of Energy, Department of Transportation, the
3 Environmental Protection Agency, the Nuclear Regulatory
4 Commission and Food and Drug Administration.

5 Those personnel, as well as some FEMA staff,
6 were responsible for reviewing the plans that we have
7 received and provided comments on those plans. In accordance
8 with the directives that we have in NUREG-0654, also known
9 as FEMA REP I, REP being Radiological Emergency Preparedness,
10 those comments are provided back to the jurisdictions to
11 assist them in review and improving the plans that have been
12 developed.

13 Secondly, we have a review process, as I
14 indicated, by the FEMA Regional Director. It is a process
15 that results or includes the plan review, the exercise
16 evaluation that we conducted last Wednesday, and this public
17 meeting that is occurring tonight.

18 We have ongoing program management within this
19 review process in the fact that we have FEMA regional
20 representatives assisting state and local government and
21 plan development in the ongoing program down here. The
22 Regional Director will then provide a written report
23 consolidating the findings and recommendations up to FEMA
24 headquarters.

25 There, there is a third review process that
26 takes place in the National Office Review of FEMA. That

1 provides some reflection against the other Radiological
2 Emergency Preparedness program activities at other sites
3 within the United States and further results in the review
4 and passage to the steering committee, which is made up of
5 NRC and FEMA personnel and ultimately ends up with a
6 recommendation or finding that is sent to the Nuclear
7 Regulatory Commission as an official document from FEMA by
8 way of a report.

9 In regard to FEMA status of plans, the plan
10 review process was completed approximately three to four weeks
11 ago. It was sent back down to the local jurisdictions. That
12 plan essentially provided informal review to those juris-
13 dictions and recommendations, as I indicated, in accordance
14 with 0654.

15 We found that there was some additional
16 planning necessary, especially in the area of standard
17 operating procedures or support level plans to further
18 identify these specific procedures, checklists that were
19 necessary to allow for adequate coverage. State plan was
20 reviewed last year by the RAC and still requires standard
21 operating procedures and additional operating instructions
22 to be developed. When those come in, we will continue to
23 review those.

24 The process was that the RAC individually
25 reviewed each of the plans, wrote their comments in
26 accordance with 0654, FEMA REP I, that was followed by a

1 joint discussion and review by all the RAC members and FEMA
2 representation from the region where we developed a
3 consolidation of the findings. Those were sent back, as I
4 indicated, to the local jurisdictions.

5 As a result of the exercise that took place
6 last Wednesday, the evaluation team that was made up of FEMA
7 and RAC members developed findings at this time, informal
8 findings, that I will summarize to give you an idea of
9 approximately what we found. The final formal findings will
10 be in written format and will be generated within 14 days
11 of the date of the exercise.

12 The observations that I have referred to were
13 developed through a consolidated process within a 24-hour
14 period following the exercise to develop general comments
15 relating to the key findings. These specific findings and
16 suggested corrective measures will be developed, as I
17 indicated, in detail within 14 days of the exercise and will
18 be provided to each jurisdiction. Clarification of discus-
19 sion deemed appropriate will be handled at that time.

20 Our observations and resultant findings were
21 based on three primary factors: adherence and execution of
22 present planning, demonstration of ability to protect public
23 health and safety, and the application of the basic planning
24 criteria identified in NUREG-0654, FEMA REP I. We might add
25 here that we fully understand and appreciate the tremendous
26 effort that was made on the part of all of the jurisdictions

1 to respond to this exercise within the extremely short
2 preparation time involved regarding response procedures and
3 staff work. Our conclusions reflect that understanding and
4 should be received as suggested in the recommendations which
5 may be incorporated into subsequent planning, training and
6 drill or exercise activities.

7 Over all, each jurisdiction demonstrated an
8 active, dynamic and enthusiastic effort during the exercise.
9 General disaster response procedures and participant play
10 were found to be very good and demonstrated an excellent
11 capability to handle all play related to the exercise. The
12 specific area dealing with radiological issues, however,
13 reflected some areas of concern and a need for future training
14 and drill activity.

15 The following is a brief address of some of
16 those specific items of concern. There appeared to be no
17 preparation or limited address of public information or
18 Emergency Broadcast System or EBS releases relating to
19 emergency information following activation of the sirens,
20 that being simulated activation. Materials were in one
21 instance released to the media or EBS after simulated
22 sounding of the alert siren, creating a potential for
23 confusion on the part of the general public, who would not
24 receive immediate follow-up information from their radios.

25 With the exception of Orange County,
26 evaluators did not observe any implementation of the rumor

1 control system. Orange County had a system of ten phones
2 established, but the information there released did not
3 specifically request an "Official Exercise Release Only"
4 caption until identified by one of the evaluators.

5 There was a perception of a lack of telephone
6 or communications discipline in all observed areas.
7 Telephones identified for specific use, such as for coordina-
8 tion or radiological information relay, were used without
9 regard to planning and were not staffed by an "identified"
10 or "dedicated" communicator with message dissemination to
11 the entire staff.

12 There was a general observation that the
13 meteorological data and sources such as the National Weather
14 Service were not used effectively where status boards were
15 not maintained where established in EOC's.

16 With the exception of the San Clemente team,
17 radiological field team procedures and application were found
18 to require further training and standardization. Understand-
19 ing and application of basic radiological defense principles
20 were not considered to be sufficient to provide the type of
21 monitoring necessary for dose assessment and resultant
22 decision-making required of the Radiological Emergency
23 Preparedness. Teams were found to have faulty, out-of-
24 inspection or non-operating equipment in a number of cases.

25 Reporting procedures were varied, and in some
26 cases, communication problems were evident.

1 No ingestion pathway sampling and no laboratory
2 analytical capability were observed. This was partially the
3 result of the development of the scenario. Limited coordina-
4 tion between jurisdictions regarding decisions made by each
5 EOC was observed. Total effective use of dedicated telephones
6 was hindered in some cases due to the lack of speaker-phone
7 capability at the EOC's. Use was not limited to critical
8 functions, such as dose assessment and decision-making issues.

9 Further procedural definition, including
10 written standard operating procedures or SOP's was considered
11 to be needed. There was no demonstration of a flexible
12 monitoring response capability to plume tracking through use
13 of sector and zone designators as depicted, for example, in
14 Table J-1 of NUREG-0654, FEMA REP I or some similar
15 alternative to that.

16 Additionally, no cooperative interjurisdic-
17 tional monitoring team was observed, limiting available teams
18 and standardized procedures. Number of operational-level
19 team activities lacked standard operating procedures or
20 checklists that would have assisted in team response and
21 standardized actions where, for example, personnel turnover
22 or shift changes might occur and limit team proficiency.

23 Lastly, traffic control or highway access was
24 hampered by an apparent lack of coordination between the
25 counties. Procedures differed as to initiation of roadblocks
26 and traffic evacuation. Procedures were not followed

1 according to planning or exercise guidelines, as were
2 determined by the controllers in the setup of the exercise.
3 A number of these, if not all of these concerns, generally
4 identified are felt to be correctable through training and
5 future drill and exercise activities. The present and
6 ongoing coordination and development of planning criteria
7 on San Onofre will, I think, reflect corrective actions that
8 will resolve a number of identified concerns.

9 MR. SANDWINA: Are there any questions of a
10 clarifying nature that you would like to ask at this time?
11 I might add for the official public comment section of this
12 meeting, I would like to ask that you step up to the micro-
13 phone. We have one at each side. State your name and give
14 us your place of residence, please.

15 MRS. HICKS: I have a question of clarification
16 first. Is this the time for public comment on the drill?

17 MR. SANDWINA: I would save that, if you would,
18 for the other section, but go ahead if it is a quick one that
19 we can clarify.

20 MRS. HICKS: No, it is not quick. I do have one
21 question of clarification.

22 I am Lyn Harris Hicks. I am the State of
23 California, San Onofre State Park, Citizen Advisory
24 Committee's Emergency Evacuation Planning Director.

25 I would like to point out that, to my
26 knowledge, there has been no public notice that the subject

1 of this meeting was to be changed from the presentation by
2 FEMA on the outcome of the drill to a discussion of our
3 emergency plans. To my knowledge, there has been no public
4 newspaper coverage of that change, and I don't think that
5 any of the jurisdictions involved knew of that change, at
6 least not until late this afternoon. I heard one rumor late
7 this afternoon that that change had been made. I would like
8 to have that on the record.

9 I don't know whether any of the other people
10 representing the jurisdictions might clarify that from their
11 standpoint when they make their presentations, whether they
12 had any notification of that; but we do have very great
13 citizen participation in citizen committees, and these people,
14 I am sure, would like to have presented their work and their
15 findings.

16 MR. SANDWINA: Thank you. We did call this meeting
17 for the express purpose of receiving public comment on the
18 set of plans that have been developed here, and that is the
19 purpose and intent of this public meeting. We will, however,
20 consider questions or comments that the audience might like
21 to make with regard to the exercise. We had no intention
22 of conducting a public meeting or something of that nature
23 with regard specifically to the exercise. That was not part
24 of our intent.

25 MS. BOBERG: I am Dorothy Boberg. I live in
26 Northridge, California. I am the Research Director for

1 GUARD.

2 My question is, since you enumerated a large
3 number of deficiencies with regard to the drill, is it your
4 position that no matter how large the deficiencies are, that
5 the drill will be considered to be successful and proof that
6 San Onofre can be safely evacuated in the event of a major
7 emergency?

8 MR. SANDWINA: That's a very good question. I think
9 we will provide the facts as we found them, the finding,
10 together with our judgment and determination on whether we
11 considered the play satisfactory in terms of the exercise
12 scenario; and we will be providing all of those deficiencies
13 with suggestions for improvement to our headquarters, and
14 they in turn will review them as they see fit and present
15 to the NRC for the NRC's consideration.

16 The judgment about whether they are adequate
17 or appropriate in terms of licensing process, that is NRC's
18 responsibility.

19 MR. MANDA: I might also add that whenever you do
20 conduct an exercise, you expect to find deficiencies; and
21 that's one of the purposes of having an exercise. Then, you
22 have further drills and exercises in the future to correct
23 these deficiencies that you did find.

24 MR. SANDWINA: Okay. I would like to move, then,
25 to the presentation of the jurisdiction plans, and would ask
26 Mr. Jack Kearns from the State Office of Emergency Services

1 to share with you his perspective and concerns about the
2 State Plan.

3 Mr. Kearns?

4 MR. KEARNS: My comments are a little more detailed
5 than just addressing the State Plan. My name is Jack Kearns.
6 I am the Deputy Director of the California Office of
7 Emergency Services.

8 Title 44, Part 350 of the Code of Federal
9 Regulations requires that the FEMA Regional Director is to
10 conduct at least one public meeting in the vicinity of the
11 nuclear power facility to acquaint the members of the public
12 with the content of the state-related local plans, to answer
13 any questions about the FEMA review, to receive suggestions
14 from the public concerning improvements or changes that may
15 be necessary and to describe to the public the way in which
16 the plan is expected to function in the event of a real
17 emergency.

18 As Mr. Manda indicated, this is the reason
19 for tonight's meeting. Shortly, I will address the status
20 of the State Plan, our review of local plans and our observa-
21 tions regarding the exercise conducted last Wednesday.

22 However, before I address these issues, I
23 should point out that Title 44, Part 350 of the Code of
24 Federal Regulations also outlines a process of plan review
25 and approval that includes heavy involvement of state
26 government. This process was virtually circumvented when

1 the Nuclear Regulatory Commission arbitrarily invoked the
2 Memorandum of Understanding with FEMA. Under the Memorandum,
3 the NRC is requiring FEMA to submit findings and determina-
4 tions by June 1 as to whether the state and local emergency
5 plans that support the San Onofre Nuclear Generating Station
6 Units II and III are adequate and capable of implementation.

7 The State has gone on record objecting to the
8 invoking of the Memorandum of Understanding, and I will submit
9 for the record a copy of our letter to the Nuclear Regulatory
10 Commission. In the letter we took exception to the fact that
11 we never received an official notification of the NRC
12 invoking the Memorandum. Furthermore, no reason or explana-
13 tion has ever been given as to why this extraordinary step
14 was taken.

15 We at the state level have not obstructed
16 development of plans in any way. On one hand we find, as
17 tonight, CFR 350 is being followed, but on the other, it is
18 being ignored. Notwithstanding our objections to the process
19 being employed by NRC, let's discuss the status of the State
20 Plan.

21 The State Office of Emergency Services has
22 executive authority and responsibility for general planning
23 of State Agency response. The California Nuclear Power Plant
24 Emergency Response Plan, our basic administrative document,
25 has been rewritten to meet revised criteria. It is a generic
26 document that outlines who is responsible for doing what.

1 Fourteen state agencies have specific respon-
2 sibility delineated in the plan. Foremost among these are
3 the Department of Health Services, the Highway Patrol,
4 Caltrans and the National Guard. We are presently in the
5 process of developing implementing procedures for all state
6 agencies, and anticipate completion by July 1 of this year.

7 In addition to protecting the public from the
8 ingestion of contaminated food or water, the State assumes
9 a lead role, and the Department of Health Services had
10 developed a comprehensive plan and is now working to finalize
11 the implementing procedures. In California, local govern-
12 ments have basic responsibility for protecting the public
13 health and safety. State agencies provide assistance and
14 support.

15 In late February plans for Orange County, San
16 Diego County, San Juan Capistrano, Camp Pendleton and State
17 Parks and Recreation were submitted to the OES by the utility
18 for review, as was a local interagency agreement addressing
19 evacuation procedures. The San Clemente plan was submitted
20 directly by that city.

21 These documents are primarily administrative
22 plans containing little in the way of specific procedures
23 and implementing instructions. As a result, the documents
24 met few of the planning criteria set forth in NUREG-0654,
25 the federal documents used in evaluating the plans. We are
26 still awaiting submission of the procedures necessary to

1 support these administrative plans; and until they are
2 reviewed, we cannot adequately judge their ability to be
3 implemented.

4 Despite the lack of implementing procedures
5 on both the state and local levels, the San Onofre exercise
6 was conducted last Wednesday. To the credit of all players,
7 the exercise generally went smoothly. State players and
8 observers noted that all jurisdictions attempted to coordi-
9 nate protective actions and public information. Further,
10 based on data available, state and local agencies succeeded
11 in successfully developing dose projections in a timely
12 manner. Also, each jurisdiction observed by the State
13 adhered closely to their existing plans.

14 Mr. Nauman listed specific exercise problems,
15 and let me just add that we also noted some difficulties
16 during the exercise, the most important being the insuffi-
17 ciency of the scenario. It did not permit testing of
18 ingestion pathway responses, implementation of a personnel
19 dissemination program or any simulation of or exercising of
20 reentry and recovery.

21 It should be noted that current local plans
22 cover only the ten-mile federally-required Emergency Plan
23 zones. However, in addition to these federal planning
24 requirements, California legislation requires planning for
25 extended areas around each nuclear power plant. For San
26 Onofre, this extended emergency planning zone covers an area

1 along the north coast that includes Laguna Beach, circles
2 east at about the same distance around the plant, then
3 extends to the east as far as 33 miles and back to the coast.

4 State and local officials will work together
5 to determine the most appropriate protective actions and
6 warning systems for each area and segment of the population.
7 We look forward to closer cooperation and coordination
8 between utility and local and state government in finalizing
9 these plans and in developing the detailed procedures, the
10 training and the further drills and exercise necessary for
11 adequate emergency preparedness. Much has been done, much
12 remains to be done.

13 MR. SANDWINA: Thank you, Jack. Are there any
14 questions of clarification?

15 MR. MECHAM: My name is Bill Mecham. I live in
16 San Clemente. I am with the City Council here.

17 Mr. Kearns brought up the question of the
18 invocation of the Memorandum of Understanding. I believe
19 that if you could give us some more clarification as to
20 exactly what that means to the process under which we will
21 be operating, it would help the public here to better know
22 the parameters of your review process.

23 MR. SANDWINA: Let me try to do that very briefly.
24 We have a proposed rule that is just that -- proposed, which
25 outlines these specific procedures and circumstances and time
26 factors, and so forth, that we would operate under should

1 that rule be final, formal and adopted and should all parties
2 involved with this review process agree at this time to work
3 under it. That has not happened here.

4 The NRC, by virtue of the Memorandum of
5 Understanding between our agencies, I believe -- I should
6 not comment on the reasons why it was done. I don't know
7 the specifics. But, nevertheless, our agency and specifically
8 this region was asked to make an assessment of the status
9 of emergency preparedness and the status of plans at this
10 time, just take a slice at where things are and how they are
11 going.

12 We have tried in doing this to conform as
13 closely as possible with that proposed rule, but have not
14 in all cases done so, including this meeting. I heard a
15 reference that this was being done in accord with that
16 proposed rule. Well, not exactly, not entirely. But we are
17 doing our best to try to follow those formal procedures. I
18 can't tell you when they might become finalized. That's
19 still up in the air.

20 MR. MECHAM: Just one more point of clarification.
21 Is there a possibility under the Memorandum of Understanding
22 whereby we might not follow all the steps that we might
23 follow under the proposed rule?

24 MR. SANDWINA: Yes.

25 MR. MECHAM: Thank you.

26 MR. SANDWINA: Again, just a short point of

1 clarification. I believe that what we will be providing --
2 at least this regional office to our headquarters, and I am
3 fairly certain the headquarters will be providing to the NRC --
4 would be the Agency's interim findings since the process has
5 not been in accord with the proposed procedure. The NRC will
6 make the judgments based upon the facts.

7 I would now like to ask Mr. Ron Coleman from
8 the City of San Clemente to share with you the San Clemente
9 plan.

10 MR. COLEMAN: Mr. Chairman, I am Ron Coleman,
11 Director of Fire Protection for the City of San Clemente and
12 serve also in the capacity as Assistant Director of Emergency
13 Services for planning purposes for the community.

14 I would like to place the conversation or our
15 overview of this process into somewhat of a context by
16 explaining that the San Clemente plan consists of essentially
17 three elements. The first is called a Basic Emergency
18 Operations Plan which encompasses the wide range of activi-
19 ties that a community can be involved in other than in a
20 nuclear power plant incident or accident. This basic plan
21 is in conformance with the California Emergency Services Act
22 and, in fact, is the basic document from which everything
23 else that we have done is derived.

24 The second element of it is called the
25 Radiological Emergency Response Annex, which is an annex to
26 our basic plan. The third component of it is called the

1 Standard Operating Procedures or the operations manuals for
2 the respective departments.

3 When we developed the plan that we currently
4 operate under, we were initially informed of the existence
5 of NUREG-0654 approximately a year ago, I believe it was.
6 At that time we engaged in some discussions with both utility
7 company and various other members of county and state and
8 federal organizations to embark on a planning process. At
9 that time we took NUREG-0654 and sat down and attempted to
10 analyze those elements of it that are identified in the
11 document as being that of local responsibility.

12 As the Chairman probably knows and, I am sure,
13 most of the audience does, the City of San Clemente's
14 corporate city limit essentially encompasses the entire
15 ten-mile EPZ. The plant is approximately three miles south
16 of us, and the circle for the ten miles is roughly our
17 northern corporate city limits. So, we took that to mean
18 that our own section would have to encompass the evacuation
19 of the total community.

20 In the preparation of the plan, we met with
21 the Edison Company and met with the agencies that were
22 involved in the analysis of this document, and there was a
23 development of supportive information in the form of traffic
24 circulation studies that were paid for by the utility company.
25 One of my officers was assigned the task of actually
26 analyzing the plan. His name was Captain Dick Northrup.

1 Captain Northrup's job was to sit down and
2 cross-reference all of the requirements out of that document
3 and to translate that into local requirements. To be more
4 specific, for example, in the document it talks about
5 transportation of the populace with vehicles, without
6 vehicles, siren warning systems and so forth. That resulted
7 in the development of the document that has been forwarded
8 to the state and the federal agencies for informal review.

9 It should be pointed out in the development
10 of that annex that one of our concerns was then and remains
11 still that this is a living document, not a finished product.
12 It is a document that changes almost daily as circumstances
13 in our community change daily -- the existence of new roads,
14 the existence of shift in population, and so forth. So,
15 therefore, our document as it was forwarded was done so with
16 a caveat that the document was not to be considered as a
17 finished product.

18 Due to time constraints in the transmittal
19 of this information to the Federal Agency, we did not have
20 time to complete the preparation of the SOP's that were
21 referred to by Mr. Nauman. However, about 50 percent of those
22 SOP's have subsequently been prepared and were used in the
23 exercise.

24 As it stands right now, the observations that
25 were shared in the exercise are being incorporated and being
26 redone back into our planning effort. We anticipate -- as

1 a matter of fact, I can predict that those problems that were
2 generated during the exercise and observations that were made
3 that can be remedied by us locally, are being done so right
4 at this moment. At this point our plan is strictly an
5 interim annex, and we have considered that the responsibility
6 of us here locally is to continue working in the direction
7 of resolving those questions raised during the exercise.

8 MR. SANDWINA: Thank you, Mr. Coleman.

9 Are there any questions or points of
10 clarification?

11 I introduce Mr. Burt Turner from Orange
12 County.

13 MR. TURNER: Mr. Chairman, I am Burt Turner,
14 Manager of the Orange County Emergency Management Division.
15 We are the disaster planning organization for the County of
16 Orange.

17 We spent a lot of time on planning for a very
18 unlikely incident or accident at the San Onofre power plant.
19 We have been in this business actually since 1945; and up
20 until the occurrence of the Three Mile Island incident, our
21 plans had been approved all the way up the line by every
22 jurisdiction to which it was submitted.

23 Now, Three Mile Island made a big change, a
24 big change in the parameters that had to be followed in
25 preparing the planning and updating it and actually bringing
26 it up to speed so that we feel that it will do the job

1 required for the citizens of Orange County.

2 We have one major difference between Chief
3 Coleman's system and ours. His plan for San Onofre is an
4 annex to the basic plan. We have a separate contingency plan
5 to cover the San Onofre response. We also have a basic plan,
6 and we have annexes to it; however, they are not specifically
7 related to San Onofre. We feel that our plan basically
8 conforms with the parameters, the standards, if you will,
9 that have been laid down by 0654, NUREG-0654.

10 We realize, just as all the other jurisdictions
11 do, that this exercise last Wednesday was performed after
12 a lot of constraint. We worked real fast to get ready for
13 it. Granted, we didn't have all the standard operating
14 procedures and checklists that we should have had. However,
15 we do feel that basically we achieved the objectives that
16 were laid down by the exercise committee.

17 Like Chief Coleman's plans, ours is also a
18 living document. When we had this plan adopted by the Orange
19 County Board of Supervisors, we included in their resolution
20 one paragraph which says that changes to this plan which we
21 accomplish in the future need only be approved by the Orange
22 County Emergency Management Council. This is a group of top
23 officials of the County who advise the Board of Supervisors
24 as far as emergency matters and the emergency program is
25 concerned. So, actually, the Board of Supervisors generally
26 goes along with what the Emergency Management Council

1 recommends to it.

2 I and my staff work very closely with the
3 Emergency Management Council. In fact, I am secretary of
4 that council. We envision quite a few changes to be made,
5 and naturally we're very anxious to see what the comments
6 are from FEMA as to the exercise. We're already working on
7 the report we got from FEMA as far as our plan review is
8 concerned, and we intend to bring it up to speed as soon as
9 possible.

10 To get to Mr. Kearn's remarks, we also plan
11 to incorporate planning for the Extended Planning Zone.
12 That's all I have. Thank you.

13 MR. SANDWINA: Thank you, Mr. Turner. Any question
14 of clarification?

15 MRS. HICKS: Mr. Turner referred to a need to be
16 able to comply with the requirements of the Nuclear
17 Regulatory Commission for planning, and we do have the
18 NUREG-0654. We all know that. What I would like to ask and
19 make this an official question for the record is what
20 criteria has been established for time parameters? It is
21 very useless and to no avail to talk about whether or not
22 we can safely evacuate the people of this area if we have
23 no time parameters.

24 If it is unlimited time -- a nice long day
25 such as we had in this simulated exercise -- we can do much.
26 If we have a fast-moving accident which brings the radiation

1 over our populace in two, three hours, that's very different.
2 I would like to know what time parameters are given, if any
3 effect of that emergency planning must be based and founded
4 on meeting time requirements.

5 Those should have to be site specific.
6 According to the Three Mile Island Lessons Learned Report,
7 the recommendation was that these should be site specific
8 to the areas, depending on meteorological conditions and
9 geography of the areas.

10 MR. SANDWINA: Thank you. I don't think -- I know
11 I cannot answer that specifically. Generally, I believe that
12 evacuation times and the analysis of transportation routes,
13 geography, meteorological conditions and so forth were
14 considered in a study and reflected, I believe, in the
15 Interagency or Interjurisdictional Transportation Accident
16 Plan. Is that the proper name of that?

17 MR. NAUMAN: Interagency Evacuation Agreement.

18 MR. SANDWINA: Interagency Evacuation Plan. So,
19 many of those points are addressed there. I think that there
20 may be some additional studies or analyses necessary in that
21 regard, and I believe that that was one of the points that
22 we probably will be commenting on with regard to both plans
23 and exercises.

24 Any other questions? I would like to ask Mr.
25 Jim Hunt, San Diego County, to present the San Diego County
26 plan.

1 MR. HUNT: San Diego County, as these other
2 jurisdictions have, had a plan for nuclear response for a
3 number of years, beginning back around 1975. With a
4 revision of requirements by NRC and NUREG-0654 changes, this
5 county went ahead and began development of a plan to meet
6 those requirements. This involved contacting the utility
7 company and the various responding agencies in the County
8 to put together a plan that would meet the requirements.

9 This was accomplished and subsequently
10 approved by the County's Disaster Council, composed of all
11 the incorporated cities and the County of San Diego, and then
12 subsequently, as is our requirement, approved by the Board
13 of Supervisors. The plan was sent to FEMA for review and
14 also to the State OES. We have received a review of the plan
15 from FEMA, which we are now working on to make various
16 modifications that will be incorporated into the plan.

17 Also as a result of the exercise, various
18 notations were made which will lead again to further modifi-
19 cation of the plan.

20 FEMA has received our SOP's. I'm sorry, Jack,
21 we didn't get you a copy, but we will get them up to you very
22 soon.

23 The plan was put into effect here this last
24 week during the exercise. We felt it gives us a good
25 opportunity to test many things that the County had desired
26 to test. San Diego County has conducted a number of exercises

1 this year to insure that we are ready to meet with any type
2 of disaster. This was the fourth exercise and a very major
3 one.

4 Interestingly enough, San Diego County, as
5 far as populated areas are concerned, lies a considerable
6 distance from the nuclear power plant. But, of course, there
7 are certain actions that have to be taken, and we are pre-
8 pared to take those actions.

9 MR. SANDWINA: Thank you, Mr. Hunt. Any questions
10 of clarification?

11 MRS. DAVIS: My name is Leslie Davis, and I live
12 in San Clemente.

13 My question is back to Orange County. I was
14 kind of mulling it over before. But you stated that your
15 plan has already been adopted by the Board of Supervisors.
16 You feel that that plan is capable of evacuating and taking
17 care of the residents in San Clemente.

18 MR. TURNER: The primary evacuation of the residents
19 of the City of San Clemente is the responsibility of the City
20 of San Clemente. Orange County works with the San Clemente
21 Police Department in effecting an evacuation. We do feel
22 that it is adequate.

23 MRS. DAVIS: What I don't understand is if San
24 Clemente hasn't finished their plan and the State hasn't
25 finished their plan, how can you say that your plan is
26 finished and you know what to do, but nobody seems to know?

1 MR. TURNER: I didn't say that. I said we consider
2 that our plan will accomplish the primary objectives that
3 had been laid down by the State; and in this particular
4 exercise that I was referring to that took place last
5 Wednesday, we feel that we did.

6 MRS. DAVIS: But he said that their plan wasn't
7 finished. So, I don't understand how he can say, you know,
8 he's prepared but nobody seems to be finished.

9 MR. SANDWINA: One of the aspects of the planning
10 process is to assure the interjurisdictional coordination.
11 One of the aspects of the exercise was to see whether the
12 jurisdictions had the capability of implementing, executing
13 those plans; and surely and particularly, I think, because
14 of the sort of review process we're in, the jurisdictions
15 are under a little fire, if you will, a little pressure to
16 get these things complete. It is in the best interest, I
17 think, of the public to do it very quickly.

18 In the case of Orange County, their process
19 brought that plan to the conclusion. It is a jurisdictionally-
20 oriented plan and met the satisfaction, I suppose, Mr. Turner,
21 of your Board of Supervisors and was so adopted. What we
22 need to, or what we would try to do in this process is make
23 sure that when the San Clemente plan is adopted and
24 considered in the same fashion, in the same form, that there
25 aren't major differences in there, or if we notice some, to
26 provide that kind of feedback to the jurisdiction for their

1 change or modification.

2 MRS. DAVIS: Thank you. Okay. There are processes
3 to go?

4 MR. SANDWINA: Yes.

5 MR. WHARTON: My name is Richard Wharton. I am
6 the attorney for the intervener, The Friends of the Earth.
7 I had a question of Mr. Hunt.

8 I recently received the new plan from the
9 State of California, and that was pretty specific on the
10 Emergency Planning Zones, Extended Emergency Planning Zones
11 for San Onofre. They don't seem to follow this straight ten-
12 miles thing that's in the regulation that says -- the
13 regulations say it is supposed to be based on site-specific
14 studies.

15 I talked to someone at the County. I can't
16 recall her name right now. She informed me that when the
17 State comes out with their plan showing this Extended
18 Planning Zone, that the County of San Diego would be
19 modifying their plan to conform so that they are all
20 coordinated. My looking at it now, it appears to be that
21 the planning zones for the State Plan includes the City of
22 Oceanside. I don't think that the plans that the County is
23 talking about now include anything as far as emergency
24 planning in Oceanside. So, I would like some clarification
25 of how they are going to coordinate what the State says the
26 planning area should be and what the County has right now.

1 MR. SANDWINA: I will take a very quick stab at
2 that and perhaps ask Mr. Kearns to respond from the State
3 perspective.

4 I believe that where we are today is the
5 development of a set of offsite emergency plans based upon
6 the federally-specified criteria of ten-mile EPZ for the
7 plume pathway and 50-mile EPZ for the inhalation and inges-
8 tion pathway.

9 The State Emergency Planning Zones are
10 different; and the State, I am sure, may want to comment on
11 that. Jack, would you like to offer the State perspective?

12 MR. KEARNS: The City of Oceanside is included in
13 the Extended Planning Zone and not in the primary planning
14 zone where evacuation is the primary countermeasure.

15 We will be working with the local authorities
16 in, as I indicated in my statement, in developing the
17 appropriate countermeasures that would be applied and
18 development of plans accordingly. This may be shelter in
19 lieu of evacuation in the City of Oceanside. This is the
20 area that has to be worked on in conjunction with the local
21 authorities, but at this point in time, Oceanside is not in
22 the ten-mile planning primary zone but in the extended zone.

23 MR. SANDWINA: Thank you, Jack. I believe that
24 in my discussion I had a moment or so ago with Mr. Hunt, he
25 indicated to me that we're basically in the first phase of
26 the development -- or they are in the first phase of the

1 development of what will ultimately be the set of plans that
2 will be used.

3 MR. WHARTON: Can I ask one follow-up on this area,
4 if I might, to clarify FEMA's position?

5 My reading of the applicable NUREG -- and I
6 can't recall the name right now -- 0654, refers to planning
7 zones based upon the conditions of the area. Now, they
8 suggest ten miles, but all of them appear to be, from the
9 language of -- if you have to look at the geographics of the
10 area, topography, weather patterns and the rest of it and
11 look specifically at the area, you are saying now that FEMA
12 is going to go with 10-50 and disregard the specifics of the
13 area?

14 MR. SANDWINA: Not at all. Those judgments and
15 determinations are the prerogative of the local jurisdiction.

16 MR. WHARTON: FEMA is not going to establish any-
17 thing or give any guidelines on that?

18 MR. SANDWINA: We have that published in those
19 criteria, the ten- and 50-mile planning zones; but the
20 explicit boundaries for that are the prerogative of the local
21 jurisdiction, and those are based on the factors that he just
22 mentioned.

23 MR. WHARTON: Are there going to be any site-
24 specific studies required to determine what these are going
25 to be? I am just trying to figure out if there is going to
26 be any studies to determine what they should be, rather than

1 ten and 50.

2 MR. HUNT: There has been a study conducted by a
3 consultant that was hired by the State, SAI Corporation, that
4 dealt specifically with a nuclear plant incident and the
5 planning zones and everything else. So, that's all been
6 accomplished.

7 MR. WHARTON: That's correct, and that particular
8 plan calls for 20 miles EPZ.

9 MR. KEARNS: I can't believe that. No, I beg to
10 differ. The primary plume exposure pathway, as designed by
11 the planning criteria that we developed, did not include the
12 City of Oceanside. The City of Oceanside is in the Extended
13 Planning Zone.

14 MR. WHARTON: I am talking about the SAI report
15 referring to 20 miles.

16 MR. SANDWINA: I am going to cut this off at this
17 time and say that at the public comment portion of the
18 meeting, further questions in that regard, I think, would
19 be appropriate; and you can raise them at that time.

20 I would like to move to the City of San Juan
21 Capistrano and ask Cynthia Ferguson to present that plan.

22 MS. FERGUSON: I am Cynthia Ferguson with the City
23 of San Juan Capistrano.

24 Unlike the other jurisdictions that are
25 responding today, we have a limited capability with regard
26 to the planning in that we contract with the County for our

1 fire and our sheriff support. Our plan, therefore, is
2 basically -- although it is supplement on the services that
3 we do have -- communications operation type of plan.

4 We try to coordinate the public information
5 by monitoring the planning zone activities, updating City
6 activities and advising the residents that do call in of
7 evacuation and sheltering procedures, things like schooling,
8 their children, where they are going, sheriff and fire
9 activities, transportation assembly areas, and relocation
10 areas. We coordinate with county services providing
11 emergency actions. Additionally, we coordinate with the
12 County and San Clemente, evaluating conditions and orderly
13 procedures relating to evacuation.

14 With regard to this drill, we felt very
15 positive on all communications that we had with the County.
16 We had two gentlemen in our EOC, one from the Sheriff's
17 Department, one from the Fire Department. Because these
18 liaisons were there, we felt compelled to do even more than
19 we had listed in our plan. Also we felt the cooperation and
20 coordination between the City and San Clemente and the County
21 was very satisfactory. .

22 With regard to the new planning effort, we
23 are continuously updating our plan as everyone else. Right
24 now, we're working with the procedures that were determined
25 to better facilitate the actions of the City that happened
26 during that drill. We're also trying to establish realistic

1 siren activation procedures, determine possible evacuation
2 schedules; and we will be working in cooperation with the
3 County and with San Clemente to develop both of these.

4 The other thing which we feel was very
5 important, and I brought up before, was that we need to
6 establish emergency phone protocol and message priority. I
7 think a lot of people noted that also. If we are going to
8 utilize the yellow-phone system, we need to prioritize the
9 messages that are being transmitted across it.

10 Altogether, with our limited capability, but
11 basically working with the elements that we set down in our
12 plan, we felt very comfortable with the exercise.

13 MR. SANDWINA: Thank you. Are there any points
14 of clarification with regard to the City of San Juan
15 Capistrano?

16 MR. McCLUNG: Good evening. My name is Charlie
17 McClung. I am the attorney for the intervener, GUARD. I
18 just had one question.

19 I know that you contract for services in the
20 City of San Juan Capistrano. I was wondering if there was
21 any specific provision in the contract to provide for
22 emergency services in the event of a nuclear accident.

23 MS. FERGUSON: I am not aware if we designate a
24 nuclear accident as per se, but all emergency services that
25 are determined emergency to our city are provided for in our
26 contract with the County. Nuclear is not spelled out, no,

1 but it is under emergency services.

2 MRS. HICKS: In regard specifically to San Juan
3 Capistrano --

4 MR. SANDWINA: Mrs. Hicks?

5 MRS. HICKS: Lyn Harris Hicks.

6 MR. SANDWINA: Thank you.

7 MRS. HICKS: I understand that the total support
8 that was from the County for evacuation for San Juan
9 Capistrano in this scenario was six squad cars for the total
10 area of San Juan Capistrano and Dana Point. I don't know
11 whether that includes Capistrano Beach as well. Would that
12 be including Capistrano Beach as well?

13 MS. FERGUSON: Are you asking me or the County?

14 MR. SANDWINA: Capistrano Beach is not part of the
15 San Juan Capistrano plan, and those resources will probably
16 be provided through Orange County.

17 MR. TURNER: That would be funded by the County
18 Sheriff's Department. We don't specify any given number of
19 staff cars. We will provide what's necessary according to
20 the circumstances, because we have, as you know, a great many
21 available staff cars.

22 MR. SANDWINA: I can hear this discussion, but I
23 am not sure that the folks in the back can. If there is
24 difficulty hearing, either through the mikes or with these
25 questions -- let me ask right now. Has there been difficulty
26 hearing what's going on in the back? I would like to ask,

1 then, for these kinds of discussions that maybe the people
2 who will be responding use the other microphone. We have
3 another one on this side so that will accommodate, I think,
4 this kind of interchange.

5 MRS. HICKS: I am speaking of immediate avail-
6 ability. I know that we have tremendous resources which can
7 be brought in in a period of time, but for immediate
8 resources we were told that there were six. I wasn't sure
9 whether it was just Dana Point and San Juan Capistrano or
10 if that included Capistrano Beach as well. But I would like
11 to address FEMA's attention to the problem involved of
12 depending upon squad cars with loudspeaker systems to go over
13 the streets of such a large area to alert and notify the
14 populace and the time involved in doing that. I hope that
15 that will be addressed very seriously by your committee when
16 it does make this kind of assessment. Once again, we would
17 like very much to have some kind of criteria on which you
18 will make those types of judgments.

19 MR. SANDWINA: Thank you.

20 MRS. HICKS: One comment about the matter of the
21 conflict and whether we plan for ten miles with a straight
22 line or whether we plan for actual evacuation for the
23 distances beyond. In the Three Mile Island report that the
24 Nuclear Regulatory Commission commissioned -- a special
25 report -- it was noted that a special inquiry group study
26 estimated that 76,000 people evacuated the area within ten

1 miles of TMI during the accident. Nearly an equal number
2 of people, about 76,000, lived beyond ten and 15 miles of
3 the plant, also evacuated, some 32 percent of those living
4 in this area.

5 I would like you to consider very seriously
6 that if there is no phased planning for evacuation, which
7 there has not been -- coordinated phased planning. There
8 has not been alternate route planning, just a one-way-out
9 kind of a situation -- that if the people of San Clemente
10 and the State Parks do their job and evacuate in an orderly
11 manner and the people of Laguna Beach have known there is
12 no planning for their evacuation, that we will be bogged down
13 in the traffic snarls when we get to Laguna Beach, no matter
14 how well we do our planning. So, it is very important that
15 the areas beyond be evacuated immediately, be out of the way
16 by the time the millions arrive.

17 MR. SANDWINA: Thank you, Mrs. Hicks.

18 I'd like to move now to the presentation of
19 the Marine Corps Camp Pendleton plan. Colonel Dooley.

20 COL. DOOLEY: I am Colonel Dooley, Assistant Chief
21 of Staff of Operations and Training at the Marine Corps base,
22 Camp Pendleton.

23 Our plan has been in being for the last 20
24 years. It is updated usually about every two years. It was
25 last updated in 1979, and is due for updating again this fall.

26 The comments that we received from FEMA, the

1 results of the exercise in which we had a great many lessons
2 that we learned, will be incorporated into our planning. Our
3 planning essentially calls for all of the Marines, the
4 dependents, to be evacuated from the northern camp areas of
5 Camp Pendleton into collecting areas, if I may call them that,
6 in the southern areas of Camp Pendleton and in the Del Mar
7 area. We have facilities set up to receive the people and
8 to do the things that are necessary.

9 As you well know, our situation is a little
10 bit different than the other communities in that we may be
11 called upon to do some other things in conjunction with the
12 exercise or the actual event. So, we want to keep our
13 people standing ready to do those things. That's all I have.

14 MR. SANDWINA: Thank you, Colonel. Any questions
15 of clarification for Colonel Dooley?

16 MS. BOBERG: Dorothy Boberg of GUARD.

17 I'd like to ask Colonel Dooley why, during
18 the recent drill, the people in Camp Pendleton were to take
19 shelter when apparently the plume was moving to the north,
20 and the activity of the base there seemed to be first to take
21 care of their own. They moved their children, I understand,
22 150 children from the elementary school down to the Del Mar
23 area of the camp.

24 But as I observed the drill, it didn't seem
25 to me that the reports that were given out to the media
26 indicated that the Marines participated in any way with what

1 later became a disaster, according to the scenario, as the
2 very high levels of radiation moved over the San Clemente
3 city area. So, I am wondering why the orders were to take
4 shelter when it seemed from the scenario that the logical
5 move would have been to move the people and the Marines out
6 to help the people in San Clemente.

7 MR. SANDWINA: That may be a very difficult for
8 Colonel Dooley to answer, I believe, not being privy perhaps
9 to the specifics of the scenario. It is my understanding
10 that the scenario provided for compressed or accelerated
11 times and did so with the winds also. It is entirely possible
12 that events of the scenario may have caused that particular
13 situation. I believe we would have to take a look at that
14 to answer your question.

15 I'd like to move now to Harold Doerksen. Mr.
16 Doerksen is presenting the State Parks and Beaches plan.

17 MR. DOERKSEN: I am Harold Doerksen, Chief Ranger
18 of the State Parks in this area.

19 Our plan is much simpler than some of the other
20 agencies' plans. Simply, we are to evacuate a transient
21 population from the State Parks and the means by which we
22 do this. As a result of this exercise, we did find we did
23 have a few little internal problems, one of the major ones
24 being that we have an extremely high rate of turnover of
25 personnel. We have fallen behind a bit in our training.
26 This will be taken care of very shortly.

1 Another aspect of our plan calls for the
2 dissemination of information as to what to do in the case
3 of an emergency, which we have not as of yet accomplished.
4 Dealing with the transient population, you can't just simply
5 say go and not give some direction.

6 We did have also a problem in fly-overs.
7 San Diego County furnished a helicopter without any problems.
8 We're going to have to work a little bit with Orange County
9 and perhaps Marines and some of our outlying men to be sure
10 that everyone is, in fact, evacuated. Other than that, I
11 believe for untrained troops, we did an exceptional job.

12 MR. SANDWINA: Thank you, Mr. Doerksen. Are there
13 any questions of the Parks and Beaches -- points of
14 clarification?

15 MR. POWELL: My name is Jay Powell from San Diego.

16 I am just kind of interested in the way that
17 the park is laid out. Is there only one escape route from
18 that southern section of the park past the plant; is that
19 the way it works? Can you give me an idea of how many
20 campers, individuals and campsites are there at the peak
21 season, how many people are involved in that?

22 MR. DOERKSEN: Those exiting through the south,
23 there are 231 campsites. I believe our statistics say that
24 there are about 4.5 people per campsite.

25 MR. POWELL: So, do you have an idea of how long
26 it would take for those people, 260 campers?

1 MR. DOERKSEN: It depends on how many you would
2 have to find.

3 MRS. HICKS: Several clarifications. I think that
4 it is important for everyone to be aware that this scenario
5 that we played was really an obsolete plan. It was the
6 original plan submitted by the Edison Company from which our
7 Parks plan is very different. This scenario called for the
8 men in the jeeps to do the alerting procedure. We are hoping
9 that there will be some in-writing provision that will allow
10 us to get sirens with P.A. capability with the cassette-type
11 information so that we can shove it in and get separate
12 directions to different areas; because what you witnessed
13 in the drill was an alerting procedure which took almost three
14 hours when the NUREG requirement says 15 minutes in ten miles.
15 It is very much inadequate.

16 We feel from the drill times that we did that
17 we could not meet the 15 minutes even with the P.A. system
18 and the sirens and the helicopter fly-overs for verification.
19 We don't quite understand how these things are judged, what
20 the criteria is. We know that the Nuclear Regulatory
21 Commission says that if the people cannot be evacuated
22 safely, the plants will not operate; but there is no criteria
23 given of how safe, how much time, how many people are
24 expendable. We're still looking for that kind of criteria,
25 and I keep saying it.

26 MR. SANDWINA: Mrs. Hicks, I think I get the

1 message.

2 MRS. HICKS: Yes, I won't say that one again.

3 MR. SANDWINA: Since we are into this for several
4 minutes now, wouldn't it be appropriate to raise those in
5 the next section?

6 MRS. HICKS: I am talking about the parks at this
7 point.

8 MR. SANDWINA: That is correct.

9 MRS. HICKS: One of the major problems that we have
10 in our parks is that we don't have the staff time to do the
11 job that needs to be done. I think that we will either have
12 to be provided with more staff, or equipment -- I don't know
13 what. But it is not sufficient as it is now. Our people
14 work very efficiently, but the timings were vast when we
15 think in terms of a fast-moving accident.

16 MR. SANDWINA: Thank you. State Parks and Beaches,
17 I hope.

18 MR. DAVIS: My name is Michael Davis. I live here
19 in San Clemente.

20 I think I can shed some light on that last
21 question that Mrs. Hicks proposed earlier. I happened to
22 be present on that evacuation day and happened to be on the
23 beach talking with a number of the personnel who would be
24 charged with the responsibility of seeing to it that everyone
25 on the beach was evacuated in the event of a nuclear
26 accident. I did overhear a few comments that quite

1 specifically pointed out how they would achieve that
2 information dispersal in 15 minutes. That was that they
3 would be telling everyone to evacuate at the speed of about
4 60 miles an hour, and anyone that was in earshot that could
5 hear their P.A.'s on the jeeps during that little trip at
6 60 miles an hour out of the plant would be fortunate enough
7 to know that they were supposed to evacuate. The rest of
8 the people would be at a loss.

9 I have one other question to direct to the
10 Director of the Parks system here in San Clemente, and that
11 refers to San Onofre State Beach. During the summertime,
12 quite often there is hundreds of people camping there; is
13 that correct? I would like to know if there was anyone on
14 duty at the entrance to that park during the nighttime, say
15 between 9:00 and 6:00 in the morning.

16 MR. DOERKSEN: (Nods head affirmatively.)

17 MR. DAVIS: Okay. They stay at the head building
18 there. Okay. Thank you.

19 MR. SANDWINA: My goodness, I think we went through
20 the presentation of those plans in excellent time. I really
21 do thank you. I know it is difficult. You have got a bunch
22 of questions that you just want to get out. I would like
23 to move into that section now. I think probably with the
24 level of interest we have here, it might be well to not take
25 a break but to move right along. With that in mind, would
26 you please hopefully limit your official input to, let's say,

1 three minutes. We will allow some time for clarification,
2 questions, and answers. If you have written comments or would
3 like to submit a formal written input to this, we will accept
4 that also.

5 MR. CARVALHO: Good evening. Before I get into
6 the public comment, I would just like to make some general
7 comments about the various plans. I am George Carvalho,
8 the City Manager of San Clemente and also the Director of
9 Emergency Services.

10 Through the exercise, I experienced some
11 things that I think are valuable. I thought I would just
12 share them and get it on the record.

13 I would like to say that, in terms of my own
14 perception as to the work that has been done by our staff,
15 primarily Chief Coleman and the Fire Department, I am quite
16 satisfied that we've made substantial progress in the last
17 three or four months in terms of trying to come up with an
18 acceptable plan.

19 However, I would like to say that based upon
20 comments from citizens and other people I know, that we have
21 some improvements that can be made; and we will work towards
22 achieving a more refined plan in the near future.

23 Although I have a number of very positive
24 comments that I could make, I will not make them. I think
25 by its nature, a kind of assessment tends to project a
26 more critical assessment. I will try to itemize some seven

1 areas of comment, seven or eight that I would like to address
2 myself to at this time.

3 First of all, the decision-making process.
4 The City Council has taken a position that they would like
5 to maintain the decision-making relative to evacuation,
6 et cetera, within the community. I realize that that is a
7 very difficult thing to do based upon my own experience in
8 trying to make a decision to evacuate some large numbers of
9 people in a systematic fashion. However, I see that as a
10 problem; and I think it could be a very serious problem,
11 especially faced with the situation of having one access.

12 I note that when I was involved in the
13 decision-making process where the State decided to evacuate
14 and then we decided to proceed from the southerly end of the
15 city, that, in fact, other jurisdictions started to evacuate
16 people up and down the line; and I think that can present
17 some very serious problems in terms of congestion on I-5.
18 So, one of the things that I think needs to be addressed is
19 a more systematic and comprehensive way of making decisions,
20 even to the extent -- and I have had some informal discussions
21 with Southern California Edison about perhaps some training
22 along these lines that would involve the chief policymakers
23 as to how these decisions would be made.

24 It also will have to address what would occur
25 in terms of voluntary evacuation that may occur just by the
26 news getting out. So, I think that could be something that

1 we need to talk about. Since I-5 tends to be the major
2 access, I think one of the things that could occur is a major
3 accident on the freeway that could be associated with an
4 earthquake that would make the freeway inoperable. So, I
5 think we need to address an alternate route or an alternate
6 means of evacuating people.

7 Another area that I think we need to look at
8 is -- I am not fully aware or I don't fully understand the
9 difference between the EOC and the EOF. Perhaps there should
10 be some discussion about that. What would be the function
11 of the EOF versus the EOC? This time I understand it was
12 somewhat consolidated here at San Clemente. I saw a number
13 of available things I think that could be assimilated as part
14 of the decision-making process.

15 If you are going to segregate that, then that
16 may present a problem. So I think it is not only whether
17 you should have an EOC versus an EOF, but it also gets to
18 the area of where should that facility be located so that
19 it can be operable for the maximum amount of period of time
20 in terms of having such an incident, whether you are talking
21 about several hours or several weeks.

22 Another area that I think needs to be
23 addressed is the news release information. I am not sure
24 how that would work in terms of the role of the utility
25 company providing good press release versus the local
26 authority that may want to provide press releases in terms

1 of its obligation to try and get people fully aware and
2 mobilized and evacuated. So, I think there needs to be some
3 discussion so that such releases can be provided in a fashion
4 that would be consistent with the decisions that are being
5 made by the public officials.

6 I think there needs to be more graphic and
7 improved means of providing weather information. That should
8 be displayed so that it can be understood fairly readily.

9 One of the areas that has been talked about
10 quite frequently is that of communications. It would seem
11 to me, and although it might involve a little more expense,
12 that there should be a separate communications system for
13 the decision makers if decision makers are going to be
14 allowed to make independent decisions. If you are six or
15 eight people that will make decisions in terms of deployment
16 of personnel or evacuation, then I think they should have
17 a dedicated line that they can communicate amongst themselves,
18 and to have another line that is used for the disbursement
19 or distribution of information that is coming out from the
20 utility company. I think as a backup, you should look at
21 what would happen if the phone system was inoperable in case
22 it is coordinated with some other kind of incident. Perhaps
23 there are radios or some other means for communication that
24 would be vital at that stage.

25 Lastly, my comment would be that I tried to
26 talk with the medical people, but perhaps there needs to be

1 more research or information as it relates to the sociological
2 reaction in terms of disbursement of information about such
3 a thing. It tends to perhaps create a more reactive
4 behavior on the part of the population. I am not sure that
5 that behavior will be consistent with whatever plans we may
6 have, even how good they are. Thank you.

7 MR. SANDWINA: Thank you, Mr. Carvalho. That
8 strikes me, hearing that presentation, that perhaps it is
9 a little bit difficult to separate the input and perspective
10 with regard to the plans, the planning process and the
11 exercise that was just recently conducted.

12 To the extent we can, I would like to focus
13 on the status of the plans, entertain your specific
14 recommendations for improvement, your comments with regard
15 to the status of those plans and enter those into the record,
16 and hopefully be able to improve the offsite emergency
17 preparedness by virtue of your input. The mike is open.

18 MR. MECHAM: My name is Bill Mecham, City of San
19 Clemente. I would like to echo some of the comments that
20 Mr. Kearns made earlier. Those are the concerns that the
21 scenario for the recent exercise was very deficient in the
22 extent to which it exercised our plan.

23 Secondly, I would like to share his concerns
24 that the bringing about of the Memorandum of Understanding
25 is going to create a situation where this city's plan and
26 the plans of all of the jurisdictions involved may not

1 receive a full and a complete review according to the
2 processes that have been established or may in the very near
3 future be established.

4 Mr. Sandwina indicated earlier that he did
5 not want to give the reasons for the invocation of that MOU.
6 However, I think that that information is very pertinent,
7 and that it should be shared with the public at the soonest
8 possible time. Perhaps some of the people from Edison this
9 evening would like to do that for us.

10 One of the major reasons that I am concerned
11 that we may not receive that full review was mentioned two
12 or three times this evening. That is the single egress that
13 we have from the City of San Clemente. The only real
14 reliable egress we have is I-5. We talked about -- Mr.
15 Carvalho talked about the possibility of that being not
16 available to us due to some type of a natural disaster or
17 to some type of an accident, but I think there is another
18 factor that is involved here.

19 There was a traffic study that was done by
20 the utility, Wilbur Smith Company, that made estimations that
21 they considered to be very conservative as to how long it
22 would take to evacuate the City of San Clemente based upon
23 that plan. The best time estimate that they came up with
24 was seven and a half hours. The NUREG-0654, and one of the
25 tables that it presents, indicates that we could have
26 radiation to the ten-mile limit within an hour and a half

1 with a severe accident.

2 During the exercise that we just completed,
3 the EOC was receiving plume radiation -- was to receive
4 plume radiation in heavy doses by the fourth hour . The
5 EOC is a little bit beyond five miles. I think that those
6 factors present a conflict. I believe that there must be
7 a very strong in-depth study of the necessities for the
8 length of time necessary to evacuate and the realities of
9 what could happen in a Class IX type of emergency.

10 I think that you have indicated it is very
11 difficult to separate the plans from the exercise that we
12 have just gone through, but I do believe that Mr. Carvalho
13 has very excellently talked about the problems that we have
14 been seeing. I think that the major concern that I have is
15 that there was not any timing done of the major facets of
16 the evacuation's plans, as is required in NUREG-0654. We
17 do not know whether or not our plan will work because of some
18 of those things.

19 I would also point out that the City of San
20 Clemente's plan has some requirements of material that is
21 to be provided. Those materials are not in the city due to
22 the lack of availability -- back ordering. It also has a
23 clause that indicates that before our plan can be accepted
24 as far as the City is concerned, that there must be a
25 contract, an agreement between the utility and the City for
26 services rendered by the City to the utility at San Onofre.

1 To the best of my knowledge, that contract
2 has not been concluded to this point. There is a July 1 dead-
3 line on that particular item. So, I think that there are
4 several concerns that the City of San Clemente has.

5 I have taken more than my three minutes. I
6 don't want to take anyone else's time, but I do believe that
7 the single egress must be addressed in a very major fashion
8 before we can have this plan adopted.

9 MR. SANDWINA: Thank you. Just to share a personal
10 insight with you, as a result of what I am hearing, I think
11 it is very delightful to recognize and hear a City Councilman
12 have that depth of understanding of a plan and express that
13 level of interest in improving the emergency preparedness.
14 Thank you, sir.

15 MR. CARSTENS: My name is Carstens. I am one of
16 the interveners on San Onofre. For the last seven years,
17 I have studied these evacuation plans.

18 Now, there are a few things I would like to
19 get into perspective that I would like to have brought up.

20 For those people here who are not aware of
21 it, it is a fact that the FEM and NRC has absolutely no
22 authority to compel any town or city to train their people,
23 to direct the personnel, furnish adequate equipment, guarantee
24 evacuation of ill, elderly, disabled persons, provide real
25 and complete and immediate and direct communication to each
26 county. Furthermore, the FEM and NRC has printed guidelines.

1 Now, these paper plans -- that's only
2 guidelines. That's all they can do is print these guidelines,
3 and they just did that recently. I might say, incidentally,
4 with all due respect to the FEM, they have absolutely no
5 experience in handling an evacuation. They have never
6 handled an evacuation. They are a recently-organized
7 bureaucracy on top of NRC.

8 Now, in these paper plans, of all these places
9 that we have just heard about, are not coordinated, overlap-
10 ping, impractical and confusing. We've studied all of them,
11 and I make that statement advisedly. Now, in order to back
12 that up, Commissioner Hendrie of the Nuclear Regulatory
13 Commission stated to the Congressional Committee as follows.
14 Quickly -- he said that the Federal Emergency Management
15 Agency is practically drowning in the workload of reviewing
16 plans of accidents such as the Three Mile Island. It further
17 stated that nuclear emergency planning is not very good
18 anywhere across the land. I think that comes from the
19 highest authority.

20 Now, here is a letter I have received from
21 Miss Reed, Chief of Nuclear Power Plant Planning in
22 Sacramento for the government. Here is what she says: "In
23 California evacuation plans are the responsibility of local
24 jurisdictions in areas surrounding nuclear plants. In
25 evacuation" -- you might note -- "if necessary, it will be
26 carried out by the local agencies. Furthermore, the State

1 would assist if requested by coordinated mutual and/or
2 provided additional manpower," and so on. That's Mary
3 Frances Reed, Ph.D., Chief of Nuclear Power Plant. They
4 don't seem very anxious to do anything.

5 Now, another thing, I have looked at the
6 tremendous amount of check-offs that FEM has put out by these
7 guidelines. Very detailed, very comprehensive. I would like
8 to ask whoever is here, have these plans yet been checked
9 against all these hundreds of items in the guidelines?

10 MR. SANDWINA: Earlier this evening we did
11 indicate that the Federal Regional Assistance Committee did
12 do that review. We provided information from that review
13 back to the state and local jurisdictions. We did use that
14 criteria and that checklist.

15 MR. CARSTENS: Is the completion of that checklist
16 on each one of these plans available to the public?

17 MR. SANDWINA: I would say so.

18 MR. CARSTENS: How?

19 MR. SANDWINA: Well, I know we have the library
20 in our regional office in San Francisco, and it is available
21 there. I think anyone who might want a copy of that could
22 ask the local jurisdiction or ask us and maybe pay for the
23 copies. I have no objection to making that available. Would
24 you, Frank?

25 MR. MANDA: Not at all.

26 MR. SANDWINA: That information would be available.

1 MR. CARSTENS: We have to go to a lot of public
2 expense to get something which should be easily available,
3 because that's the heart of the whole thing. You people
4 have made these detailed things and we are in the dark as
5 to how you have found out if they conform or not, regardless
6 of this exercise.

7 MR. SANDWINA: I think, at least our intent -- the
8 purpose of that assistance committee is to help the local
9 jurisdictions by the benefit of that review and working with
10 them and identifying the areas that need some improvement.
11 I think I heard virtually every jurisdiction in the presenta-
12 tion of its plan say that it is a dynamic thing, and they
13 were intending on, if not already, modifying the plan to
14 include some of those comments.

15 MR. CARSTENS: One more comment. We're talking
16 about an evacuation here. Just evacuation. Let's suppose
17 we don't have an evacuation. Suppose the utility makes a
18 decision we don't have to evacuate, and then we find out that,
19 well, they made a mistake. Then, people have to stay in
20 their homes, and we don't know whether they have to stay
21 indoors a week, a month, or what; and they have to have food
22 and everything else. So, I think that we have overemphasized
23 the fact that when we are given an evacuation order that we
24 might give an order to stay home and face the consequences.
25 Has any consideration been given to that?

26 MR. SANDWINA: I believe that sheltering is a

1 protective action included in the series of protective
2 actions.

3 MR. CARSTENS: Shelter where?

4 MR. SANDWINA: Sheltering either in place or in
5 a relocated mode.

6 MR. CARSTENS: I don't know of any place where there
7 is any shelter.

8 MR. SANDWINA: I think sheltering in this case is
9 considered your residence.

10 MR. CARSTENS: You mean your residence is your
11 shelter?

12 MR. SANDWINA: It could be.

13 MR. CARSTENS: Is that correct?

14 MR. SANDWINA: That could be.

15 MR. CARSTENS: It would have to be, because there
16 is no other place. You don't dare go out of the house.

17 You see, gentlemen -- I want to just say one
18 thing. My experience with the NRC and you people is this
19 fact -- it stands out like a light -- you don't want to
20 bother with the practical details. You are only interested
21 in a bureaucratic review which will satisfy you people but
22 which does not get down to where are the hospitals, where
23 is the equipment, where is the trained people, where is the
24 funding. I could give you 15 different things that you are
25 not going to do, because the NRC and the Edison Company says
26 we are not concerned with those details. We're only concerned

1 whether the FEMA will put their rubber stamp on the NRC, and
2 the NRC can say we got your rubber stamp, everything is okay.

3 (Applause.)

4 MR. MANDA: We do appreciate your remarks. As I
5 say again, one of the reasons we are down here is to inform
6 the public. The reason we do the exercise is to bring out
7 these deficiencies that you are talking about, and we are
8 hoping in the future to get them corrected. Thanks again.

9 MR. WHARTON: I am Richard Wharton. I am attorney
10 for Friends of the Earth, interveners in the San Onofre
11 operating licensing procedure.

12 One question that has come up before is the
13 Atomic Safety and Licensing Board that we presented and which
14 we are going to be briefing. I think it is important for
15 FEMA to review that also. I don't know what the stage of
16 the FEMA review is at this point, whether it is something
17 that you have to review. That is, one of the major issues
18 at San Onofre is the seismic problem. We refer to it as a
19 problem. Southern California Edison says the problem has
20 been resolved.

21 The fact is, it is a seismically-active area
22 There is always that danger, be it remote or very, very
23 possible or probable. Whatever it may be, there is that
24 problem of a loss of coolant accident due to an earthquake.

25 Now, if we are talking about emergency
26 planning, I don't think we should be talking about emergency

1 planning at twelve o'clock on a day like today. I think we
2 should be talking about emergency planning for the worst case
3 that should happen. When you're talking about San Onofre,
4 you're talking about the worst case being a loss of coolant
5 accident caused by an earthquake. The earthquake that would
6 cause that loss of coolant accident will also cause a
7 disruption in most of the telephone communication lines, if
8 not all, and would cause a flooding of the telephone lines
9 and most other communication media that you have. It would
10 also cause a disruption of highways in the area, which are
11 the main means of evacuation. It would also flood the
12 hospitals with injuries, direct injuries from the earthquake.

13 The questions I see are that none of the plans
14 direct anything towards determining how do you evacuate, how
15 do you conduct emergency plans after an earthquake when you
16 have got two disasters -- one disaster causes the other.
17 That, I think, is the main problem that FEMA should be
18 looking at here in Southern California, because that is the
19 main problem with siting a nuclear power plant in Southern
20 California. You are in a seismically-active area. This has
21 to be considered, and I don't think it has as of yet.

22 MS. BALLARD: My name is Melinda Ballard. I am
23 a student here in San Clemente.

24 The United States Nuclear Regulatory
25 Commission inquiry group suggests future reactors should be
26 located only in sites that are at least ten miles and perhaps

1 more from any significant center of population. The
2 population centers beyond minimum distance of ten miles or
3 more from the plant, within which should reside the
4 relatively small population capable of being quickly
5 evacuation. Evacuation routes and the possibility that land
6 use controls or other measures can be used to maximize the
7 chances that over the life of the reactor, large numbers of
8 people are not likely to move into the area near the plant.

9 My question is, since we can't move San
10 Clemente from ten miles away from the plant -- as you know,
11 we just can't -- what does FEMA propose to prohibit the
12 doubling of the population of San Clemente in future years?

13 MR. SANDWINA: The gentleman I spoke with a little
14 while ago indicated that FEMA and the NRC don't have much
15 to say about directing anyone to do much of anything with
16 regard to those offsite emergency plans. That's the
17 situation here, too. We do not have directive authority,
18 and it is the responsibility of the state and local govern-
19 ment to consider those factors and to make whatever judgments
20 they consider appropriate. Those are local jurisdiction
21 plans, not federal or NRC plans.

22 MR. POWELL: My name is Jay Powell. I am from
23 San Diego.

24 One of the things you just mentioned, I think,
25 is really important -- this whole problem of what your
26 outlined responsibilities are. The main problem here is that

1 I think a lot of people feel that we go through the screening
2 processes where a federal agency decides what is appropriate
3 and what is necessary to be done, and then it goes through
4 another agency and another screening process; and by the time
5 we get done, we do have a very practical plan, but we don't
6 have protection of citizens of this area.

7 I respect you gentlemen doing your job within
8 the confines of your responsibilities, but I think that
9 perhaps someone should take another look at what those
10 responsibilities are. Maybe they should be broadened a
11 little bit so that some of the concerns that have been
12 expressed here today are being taken care of and being looked
13 at.

14 One of the things that struck me, listening
15 to some of the testimony that was given by some of the
16 agencies, there was a couple of quotes -- the gentleman from
17 Orange County stated that he thought it was in the event of
18 a very unlikely accident occurring there, and the gentleman
19 from San Diego stated that San Diego lies a considerable
20 distance from the plant.

21 I don't think that Oceanside -- the County
22 of San Diego, anyway, doesn't lie a considerable distance
23 from the plant when you're talking about the possibility --
24 we're quibbling over, you know, where are we going to draw
25 the line. The radioactive plume cloud doesn't stop at the
26 line just because you drew it at ten miles, and it isn't

1 going to stop just because Science Applications decided that
2 it wouldn't go this way or that way.

3 I would like to kind of emphasize that I feel
4 also that what we are trying to do here, what the spirit of
5 these drills are, is to adequately exercise under our worst
6 case scenario; and if you haven't done that, I don't believe
7 this drill has even come close to that. I don't feel that
8 you are fulfilling the responsibilities that really you
9 should be or that your agency is really conducting an
10 adequate or giving a really adequate report to the NRC.

1 The license hearings for these reactors are
2 coming up, and these are very important questions. Either
3 this plant, in a case of the worst case scenario, a Class
4 IX, it can be evacuated or it can't. I understand or I
5 would hope that that's what you are supposed to be trying
6 to determine in that drill you have conducted.

7 I as a citizen would really like to know if
8 you are going to be conducting further drills and if you're
9 going to be conducting a drill that will be of a Class
10 IX magnitude, something that is really possible now.
11 Even the NRC admits it is possible.

12 I think for instance, this puff that was
13 released, that goes on -- maybe some people don't realize
14 this, but that goes on every three months anyway in the
15 normal operation of the plant; you know, a puff of radio-
16 active gas is released. This slow leak of gas -- it is
17 very convenient that it is nice and slow, but that's
18 not necessarily what's going to happen.

19 Also I was asking a gentleman from the State
20 Parks about his situation of evacuating the campers and that
21 sort of thing. What I thought of, after he had given the
22 comment he didn't know how long it would take, there's
23 about, in my understanding, two or 3,000 workers presently
24 at San Onofre. It takes them about an hour to get out of
25 that plant.

26 I think it would be ludicrous to try and get all

1 those campers out and all those workers right past the plant
2 where the accident is occurring. These are things that are
3 real. So, I would like you to maybe put a little more
4 attention on that, and maybe you can let me know when you
5 are going to have another drill that will be a more
6 effective test of what we are trying to accomplish.

7 MR. SANDWINA: Thank you. One thing he mentioned
8 that maybe needs to be clarified, FEMA, the Federal
9 Emergency Management Agency, did not conduct this exercise.
10 We evaluated it. Exercising and drills are the kind of
11 things that we look to kind of see if things can be
12 implemented or not, to identify some areas needing
13 improvement; but basically the responsibility again for that
14 sort of thing rests with the local jurisdictions.

15 So we intend in our summary, in our findings,
16 to state very many of the things that I have heard here this
17 evening and just lay it out before those that need to say
18 that information, and ultimately the Nuclear Regulatory
19 Commission will in its hearing, I suppose, make the judgment.

20 MR. POWELL: So, the Nuclear Regulatory Commission
21 will take your findings and also pass a decision on whether
22 they considered the exercise adequate for testing emergency
23 response?

24 MR. SANDWINA: I believe they will make that
25 judgment along with the judgments of whether there is an
26 adequate offsite emergency preparedness capability.

3 1 MR. POWELL: Then, to your knowledge, are you going
2 to be requested to do another evaluation, another drill in
3 the near future?

4 MR. SANDWINA: It is possible that we could have
5 a request or a finding on the part of -- this is perhaps
6 something I should defer to NRC to answer, but I would
7 imagine that they very well could conclude that things didn't
8 meet their requirements, that they weren't adequate and
9 could suggest then to the utility that more needs to be
10 done before they can grant an operating license.

11 MR. POWELL: So, you are not prepared at this time
12 to say whether you feel that the drill was adequate to
13 exercise in a worst case scenario and whether it has been
14 successful?

15 MR. SANDWINA: I think I can state the scenario did
16 have some shortcomings, and we are not finished with the
17 analysis of the data. We have some 45 more different inputs
18 on that exercise, and we have to complete data analysis.
19 Our final report will come out in about 14 days, 15 days
20 from last Wednesday.

21 So, in about 10 days we will have that report
22 out.

23 MR. POWELL: Thank you.

24 MR. DAVIS: My name is Michael Davis. I live here
25 in San Clemente. There is one comment I would like to make
26 that pertains to the feasibility of the proposed evacuation

4
1 plan.

2 Something that might help you gentlemen
3 facilitate your evaluation a little bit more quickly, I
4 suggest some day you come up here in the peak season of
5 our area in Southern California. I am not familiar
6 whether or not you live or are familiar with the area very
7 well, but you might take it upon yourself to come on down
8 to the coastal area and take a drive along Pacific Coast
9 Highway Route 1 from San Clemente north to Newport Beach
10 on any peak day and see how long it takes you to drive that
11 route in normal circumstances.

12 It is not very easy, and it doesn't happen
13 very quickly. I think you might be well advised to do this.

14 One other question I do have is that currently
15 I am aware that there are only enough school buses to
16 evacuate, I think as it relates to the plan in its stage
17 right now, there are enough school buses to evacuate three
18 schools located within five miles of the plant here in
19 San Clemente.

20 There are, I believe, a total of 13 schools in
21 the 10-mile evacuation zone that presumably are accounted
22 for unless someone can explain to me how these schools will
23 be accounted for in light of an evacuation.

24 MR. COLEMAN: I should be the one to respond to that.
25 I know that Jill Swanson from the school district is not
26 here this evening.

To answer the gentleman's question, the school

5
1 maintains an inventory of school buses that range anywhere
2 from 40 to 50 buses at any given time. In the event of an
3 evacuation, that was alluded to by Mr. Caravalho, not all
4 the schools would be evacuated simultaneously; so there
5 would be turnaround time on the use of some of those
6 vehicles in the secondary fashion.

7 Secondarily, some of the schools in the 10-mile
8 zone are not public schools, they are private schools.
9 Those private schools in the plan are designated as being
10 handled by use of transportation systems throughout the
11 county through OCTD and through other methods of
12 transportation such as that.

13 During the exercise when we did the evaluation
14 of the schools, they used eight buses to evacuate one
15 school, which was Concordia. The other schools would have
16 approximately -- according to Jill, she called me about
17 2:30 that afternoon and advised me that they had sufficient
18 number of buses to evacuate the schools under their
19 jurisdiction during the time frame of this exercise.

20 That does not include private schools or
21 institutions like preschools.

22 MR. SANDWINA: Thank you.

23 MS. WINTER: My name is Tanja Winter. I am from
24 San Diego. I can't say that I feel very reassured, first
25 of all, with the fact that the emergency evacuation drills
26 or the other disaster drills are purely done on paper.

1 It seems to me that if the agencies were serious about trying
2 to find out whether an evacuation is feasible and possible
3 that there would be an attempt to do an actual drill. I
4 think all of this paper pushing and telephoning doesn't
5 convince anyone of the feasibility of or possibility of
6 evacuation. That's number one.

7 The other thing I would like to ask is Mr.
8 Hunt who spoke about San Diego being quite a distance from
9 the plant. I wanted to ask him whether he was aware of the
10 fact that when the Chinese tested their bomb, that we had
11 increased radiation on the East Coast of the United States;
12 and that even during the Three Mile Island accident, there
13 was increased radiation in food and water in other states
14 outside of Pennsylvania.

15 It is also true that the wind blows 95 percent
16 of the time towards San Diego. I am not at all reassured
17 by the fact that we live 15 miles from the plant. It seems
18 to me that we are not taking into consideration the fact
19 that radiation travels with the wind, and that there is no
20 way to limit to ten miles, 20 miles or 50 miles; and I think
21 we should stop playing games.

22 MS. BOBERG: Dorothy Boberg with Guard. I would
23 like to mention that in the prelicensing hearing that was
24 held in April by the Safety and Licensing Board on licensing
25 of Units II and III, the hearing officer said that following
26 the May 13th drill that there would be a presentation of

1 information to the public about this drill. Now, he didn't
2 say that this meeting was going to be held for any other
3 purpose; and I do believe that there should be some
4 consistency among government agencies about what their plans
5 are, what they intend to do and what they therefore do on
6 those days.

7 I would like to mention two other things
8 before I give you my short presentation here. All of the
9 drills -- not all of the drills but some of the major portions
10 of the drills were pretty planned, and I believe Tanja
11 made a very good point in pointing out that the public was
12 not really involved in either the planning or in the
13 execution.

14 The only experience we have had in a nuclear
15 accident of a large evacuation was at Three Mile Island.
16 The accident occurred on Wednesday, and the evacuation
17 unplanned was engaged in by 150,000 people that weekend.
18 I would like to see explored an evacuation that's more in
19 line with the reality of what already has actually happened.

20 I think you need to have people involved in
21 it, and you can't do it just on paper or with a very few
22 people.

23 The two prime questions to be answered in
24 evaluation of an evacuation drill are, number one, can the
25 people be evacuate* quickly enough to be protected from the
26 injury of radiation; and two, assuming a Class IX accident

1 such as occurred at Three Mile Island, when can the
2 evacuated area be reinhabited?

3 The second question has not been addressed at
4 all in any of these areas or plans.

5 Regarding the first question, can the population
6 be evacuated, there are three tests that should be considered.
7 Test number one, what evidence is there to prove that the
8 plant operators can identify the extent of the accident and
9 its significance to the population in time to effect an
10 orderly evacuation?

11 The second test should be what evidence is
12 there to prove that notice to respond jurisdictions in
13 agencies can be given quickly enough that they can alert the
14 population in the evacuation zone?

15 The third test should be what evidence is
16 there that populations can and would be evacuated quickly
17 enough to prevent serious radiation injuries?

18 With regard to the first test, the ability of
19 plant operators to evaluate and understand significance of
20 the accident, in cases of serious accidents at nuclear
21 power plants, a common feature has been the inability of
22 plant operators to promptly and correctly assess the nature
23 and extent of the reactor damage and its significance.

24 This failure has usually been followed by
25 claims by those in authority in the Nuclear Regulatory
26 Commission that no radioactivity has been released or that

9 1 the amount is negligible. It is only learned later, usually
2 much later, that radioactivity has been released and that
3 the amount is unknown because the instrumentation went off-
4 scale.

5 This was what occurred in the case of Three
6 Mile Island. The day after the accident began, Joseph
7 Hendrie, Chairman of NRC, testified to Congress that about
8 onepercent of the fuel rods were damaged, releasing
9 radioactivity.

10 It is now believed that at least one-third of
11 the fuel rods were damaged, releasing huge amounts of
12 radioactivity to the coolant in the containment and the
13 auxiliary building which is out of containment, although it
14 is not generally understood by the public that the
15 auxiliary building is out of containment.

16 There was no testing of the factor of plant
17 operator assessment of damage or its significance in the
18 scenario for San Onofre.

19 Regarding test number two, written notification
20 to jurisdictions and agencies: The San Onofre drill was
21 unrealistic because it was not a surprise test, but was
22 planned and much was organized in advance. However, even
23 with advance planning, our observers noted the following:

24 The accident began at 6:45 a.m. However, by
25 8:05 the Emergency Support Center on the San Onofre site had
26 apparently not received official notice of the accident.

1 That site was just a few hundred yards from where the
2 accident scenario was supposed to be occurring.

3 The first notice received by the State Parks
4 Center came in at 6:37 a.m. However, the essential in-
5 formation needed for action on wind directions and radiation
6 amounts was not received until 10:20 on wind direction,
7 and 11:17 on radiation levels.

8 San Onofre State Park was evacuated any way
9 at 10:30 without awaiting the planned triggering event --
10 the wind and radiation information.

11 The park two to three miles from the reactor,
12 San Clemente State Park, was not evacuated until 12:45 p.m.
13 The ranger on duty discovered that his Geiger counter was
14 without batteries.

15 It really didn't matter since the scenario
16 showed the radiation count to be 400 millirads per hour at
17 this distance, and Geiger counters only count up to 50
18 millirads per hour. If his Geiger counter had worked, it
19 would have been off scale long before he received the order
20 to evacuate the area.

21 The first notice of the 6:45 occurrence was
22 announced at a news media center at the Boys and Girls
23 Club after 9:00 a.m. Although the site emergency was called
24 at 9:10, the news was given to the press at this center after
25 9:50, 40 minutes after it occurred.

26 The press had all left the news center for lunch

11 1 by 12:30. None had received the information that a general
2 alert had been called between 12:00 and 12:15.

3 This crucial time lag would have presented a
4 timely TV and radio warning of evacuation for population
5 immediately following the general alert announcement.

6 Yet time was of the essence since the scenario provided that
7 lethal radiation doses would flow over San Clemente within
8 the next 10 hours.

9 Regarding test number three, can the population
10 be evacuated quickly enough to prevent injury, there was no
11 test of actual evacuation of population and elements
12 except for preplanned transport of senior citizens from the
13 Senior Citizen's Center to the University of California
14 Irvine which occurred at 2:30, over three and a half hours
15 later than planned, and transport of pupils from Concordia
16 School to Dana Hills High School.

17 There are serious questions in the minds of
18 the participants of these moves about how they operated,
19 even with preplanning. This drill presented little if any
20 evidence that the population of San Clemente could or would
21 be safely evacuated in an emergency.

22 With regard to the second prime question,
23 assuming a Class IX accident, when, if ever can the
24 evacuated area be reinhabited? The evidence from actual
25 situations where massive radiation has been released, such
26 as Bikini and Chalibinsk in the southern Urals of U.S.S.R.,

12 1 is that people cannot safely be resettled in a highly
2 irradiated environment for at the very least one generation.

3 It is the conclusion of GUARD that this drill
4 failed to show that evacuation and return of citizens of
5 San Clemente is feasible in a major nuclear accident.

6 MR. SANDWINA: Thank you, Mrs. Boberg. Would
7 Southern Cal Ed wish to respond to the technical issues
8 and matters of on-site capability?

9 MS. WINTER: I just wanted to add something to my
10 testimony, may I? There was a recent study done that was
11 mentioned before, by Science Applications, for the state
12 which in they projected some figures in the event that there
13 was a Class IX accident at San Onofre. They estimate that
14 130,000 people could die directly, 300,000 would die
15 eventually from latent death from cancer due to radiation,
16 that somewhere between four and five million people would
17 have to evacuate the area for under ten years and about an
18 equal number would have to evacuate the area over a ten-year
19 period.

20 In addition, they estimate the area to be
21 contaminated about 160,000 square miles.

22 So, I would say that you should take these
23 figures -- and this is a very conservative research
24 institution doing the study. I would like to see you take
25 that into consideration.

26 MR. SANDWINA: Thank you. Mr. Pilmer, did you

1 want to respond to some of those technical issues?

2 MR. PILMER: Thank you. I just stepped out a minute
3 when the question came.

4 MR. SANDWINA: Basically as I can recall, the
5 questions had to do with the timeliness of warning notifi-
6 cation on site, the ability to make the projections and
7 things of that type.

8 MR. PILMER: This came up in the context of how
9 long it took to activate emergency centers and so forth?

10 MR. SANDWINA: I believe so.

11 MR. PILMER: The San Onofre Emergency Plan requires
12 that for all emergencies that they be handled by people on
13 shift at all times. That capability exists 24 hours a day
14 under all circumstances.

15 In the event that we have an accident that's
16 classified as being an alert emergency or more severe
17 category, this requires activation of our technical support
18 center.

19 Now, this is the first level of adding
20 additional on site response capability at the site, and
21 normally one would expect that that center would be
22 activated within about 30 minutes with a partial activation
23 and fully activated within one hour.

24 Our plans are predicated upon these requirements.
25 Let me explain that the technical support center activation
26 means that it is staffed by virtually all supervisory and

1 management personnel who are normally assigned to the station.
2 They are on call and would be called in for these types of
3 emergencies.

4 In the event that we have a site emergency or
5 a general emergency, the most severe categories, in addition
6 we activate a number of people from our headquarters in
7 Rosemead, and they man the Emergency Operations Facility,
8 that operation which was conducted here in San Clemente and
9 a support center at San Onofre.

10 This includes senior management and an officer
11 of the corporation in charge.

12 From there we can call in a large number of
13 resources from across the country if necessary. Our
14 presence in the Emergency Operations Facility, we provide
15 for within an immediate liaison person from shift personnel
16 at San Onofre, and in the case of our exercise we send a
17 health physics engineer; and our plans call for that
18 under all circumstances.

19 So, he arrives here quite soon before actually
20 people from the headquarters have an opportunity to arrive.
21 Full activation under site emergencies and general
22 emergencies, we would expect to have adequate capability
23 established within one hour upon such a declaration, and
24 our plans and procedures are predicated upon that.

25 I would be happy to entertain any other
26 specific questions if that would be helpful.

15 1 MR. SANDWINA: I have a matter of concern. I think
2 it has come up with several of the inputs, and that is
3 in regards to the scenario for the exercise. Would you care
4 to comment on that? It was the understanding that was,
5 to use the terminology I used earlier, an accelerated or
6 compressed-time scenario. I would be interested in your
7 comments on that.

8 MR. PILMER: Well, as far as the philosophy that went
9 into the scenario that we developed, I guess you could say
10 that we are new at this game in terms of the type of
11 scenario that we had here. We intended it to be primarily
12 outward looking to provide a full opportunity of state and
13 local government to exercise their plans as was practical
14 in a reasonable period of time, and that is to say one
15 normal working hour day, perhaps a little extended.

16 We started a little earlier than the normal
17 working hours.

18 I think that I can state confidently
19 that where we see that there were limitations in the scenario
20 as it affected the ability to exercise all portions of the
21 plans, that we will pick those up at the next exercise;
22 but the intent of the scenario -- and I think it was
23 proven that we were able to show an exercise of the major
24 portions of all the emergency response plans but certainly
25 not every single capability.

26 MR. SANDWINA: Thank you, Mr. Pilmer. Certainly

16 1 in the last presentation and comments we have taken quite a
2 bit more time than what we had hoped to for this section,
3 but I think it was important. There were two, I think, very
4 important perspectives shared with us.

5 MS. WILLIAMSON: I am Dee Williamson. I live in
6 San Clemente. My concern is in listening to everyone up
7 here, you know, discussing the worst disaster -- if this
8 happened, say a number of us were fortunate to get out of
9 here safely, every man, woman, child, pet and dogs and cats,
10 whatever; and we couldn't come back here for a long period
11 of time, say, six months, ten years, whatever; has anything
12 been addressed to this?

13 Some of us have our life savings in our
14 properties here, everything is here. Who would reimburse
15 us for this? How about medical expenses if we had radiation?
16 I mean, this could go on and on.

17 I recently read about this incident in Utah
18 and Idaho where they made the movie where some 50 people
19 have contacted some forms of cancer, and 40 some have died,
20 including John Wayne -- they think it might have been
21 possibly related.

22 So, that's what is on my mind.

23 MR. SANDWINA: Thank you. I don't feel qualified
24 to provide an answer to that. I would like to be able to.

25 MRS. DAVIS: My name is Leslie Davis. I would just
26 like to make a point in that presently the two nuclear power

17
1 plants are not operating right now. Edison is applying for
2 an interim license to start up Unit II before any evacuation
3 plan is completed. I would like to appeal to FEMA to
4 recommend to the NRC that no interim license is granted
5 until an evacuation plan is completed, I mean, by state,
6 you know, local and federal.

7 It just seems to me that an interim license
8 right now to start up the plant at low power is just, you
9 know, not feasible. I would like to make that statement.

10 MR. SANDWINA: Thank you.

11 MS. LEUSCHEL: My name is Nan Leuschel. I am from
12 Dana Point. I am pretty new to the procedures involved.
13 I know a little bit about it, and I am a little bit --
14 really actually confused by what has been said here today.

15 It was my understanding that FEMA through a Memoranda
16 of understanding actually had the authority or somehow it
17 was going to make an approval of these evaluation plans,
18 and based upon that the NRC would use that to say that
19 evacuation plans are okay.

20 Yet, I hear tonight that you don't have any
21 authority in saying that they are okay or not okay. If you
22 did, then you would be telling them what to do.

23 MR. SANDWINA: I think that we do have the
24 responsibility to make a statement of findings of fact on
25 acceptability, readiness and so forth. We do not have the
26 authority or responsibility to direct that corrections or

18 1 improvements be made. Our job, I think, is to identify those,
2 and you are helping us to.

3 MS. LEUSCHEL: If you say they are not acceptable,
4 I guess they would go back and try to revise that so this
5 would be acceptable. That would be telling them what to do?

6 MR. SANDWINA: I think that's it.

7 MS. LEUSCHEL: I have one more question. I don't think
8 the Edison man -- maybe because he wasn't here when the
9 question was asked -- responded to what I thought you were
10 asking him which was how does he explain the fact that the
11 alert, or what in his terms would be the alert, at six
12 o'clock and the local agencies didn't find out until 8:30.

13 That is more than one hour.

14 MR. PILMER: I think perhaps there is a misunderstanding.
15 The way the exercise is conducted is that we had an exercise
16 controller that gives some information to the power plant
17 operators that he has to then interpret in the context of
18 his procedures and determine whether or not there is an
19 emergency based upon that information.

20 That determination was made and the declaration
21 of an alert level emergency was made at approximately 6:45.
22 An alerting of all state and local emergency response
23 organizations proceeded immediately thereafter. I don't
24 think the whole alerting process, notification process, took
25 more than 15 minutes.

26 So, I think the statement was referred to some

19 1 follow-up information that was communicated, at least as I
2 heard it and interpreted it, either that or information
3 as it is disseminated by the response organization to the
4 news center via their public information officer, and that
5 is an entirely different process.

6 MR. SANDWINA: I would like to turn to Ken Nauman,
7 the Project Officer, for the conduct of that evaluation;
8 and perhaps he can share some insight with us.

9 MR. NAUMAN: As our evaluation team would
10 corroborate what Mr. Pilmer just indicated, the alert
11 notification went out to all the jurisdictions within a
12 satisfactory period of time. It was within approximately
13 15 minutes, as Mr. Pilmer indicated, and that activates
14 according to all the plans.

15 They are basically an alert recall system within
16 the jurisdictions to bring personnel in. Additional followup
17 messages were sent out in regard to the various levels of
18 emergency subsequent to that.

19 MS. HARSCH: My name is Kathy Harsch. I am from
20 San Diego. I just wanted to say that everyone talks about
21 the paper and the game and doesn't really consider what this
22 all is talking about. I lived 30 miles away from TMI during
23 the accident; and although it was not considered in the
24 evacuation area, we were told to leave town. I saw a lot
25 of effects from that -- my own included.

26 When you think about what do I take with me,

20
1 will I ever come back here, what is going to be here if I
2 come back; and you see the people afterwards, you see the
3 people who are displaced with small children and pregnant
4 women and the cost that they incurred by simply having to
5 be out of their homes for two or three weeks -- placed in
6 motels.

7 Those are things that aren't taken into
8 consideration here at all. I haven't heard anything saying
9 where the people go once they have been evacuated. Is that
10 included in the plans?

11 My family lives 3,000 miles away from me. I
12 am lucky that I had friends in Washington D.C., and we
13 were able to go there. But a lot of people in this area
14 don't have people that close. Where are they going, and
15 can they come back? Nobody knows.

16 The newspaper stories and television stories
17 change every 15 minutes. If you turn from Channel 8 to
18 10, they have a different story, a different situation.
19 These things aren't addressed, and it is not a game.
20 It is a very real and frightening experience, and the
21 sociological and psychological effects have not been
22 addressed at all.

23 MR. SANDWINA: Part of the criteria that we use
24 in the evaluation of plans and offsite emergency preparedness
25 has to do with the things just mentioned -- I think public
26 awareness and education information; and that perhaps in this

21 1 process we're going through, one of the key areas of
2 improvement is to bring to you, the public, better
3 information about what those protective actions are and
4 what things can and ought to be done under what circumstances.

5 MRS. HICKS: I took so much time in the beginning
6 portions of it that I am not going to read my statement on
7 the summary of my parks plan, but I would like to divide it
8 so that it will be part of your record.

9 MR. SANDWINA: Thank you.

10 MRS. HICKS: I do have one point I would like to
11 bring to your consideration, and that is that in all of this
12 planning there is sometimes a few items which are ones that
13 people just don't have answers for. It is sort of like in
14 the nuclear industry, in the nuclear situation, we don't
15 seem to have an answer to what do we do with the long term
16 waste products for hundreds and thousands of years?

17 I think that this is a matter which must be
18 considered by FEMA when it is considering evacuation
19 potential as well, because we have the problem of the waste
20 storage and the proposals to keep the high-level wastes
21 onsite, which will not be accepted in any other states.

22 So, that is one item.

23 The other is that in the matter of evacuation
24 we have one item which is in a similar category that nobody
25 seems to be able to find an adequate answer or solution to
26 the problem, and that is the confirmation of an evacuation

22 1 having taken place. The only suggestions that we have
2 found are that people are being given some kind of pre-
3 educational program where they would know to put a certain
4 color of rag out on their front door or something to
5 indicate that they were out and gone from the house.

6 Of course, if a person is crippled or an
7 elderly person or someone hard of hearing, he wouldn't know
8 to go out and put that little green or red or whatever rag
9 on the door. What if they don't have a green one or a
10 red one or whatever it is? I am just being facetious about
11 it in that sense, but it is a serious problem that I think
12 has not been addressed seriously.

13 How do we confirm -- I don't mean just bringing
14 helicopters over to run through an area in three minutes,
15 such as was portrayed in the drill we had, some really
16 serious consideration of how you will confirm that people
17 are out and provide for those people who are not.
18 Thank you.

19 MS. GROEBEL: My name is Stephanie Groebel. I am
20 a resident of San Diego. I am here like a lot of people to
21 express my concern about the possibility of a serious
22 accident at San Onofre, and I think that a lot of the
23 points that have been brought up tonight are very valid;
24 and I hope that FEMA will take them all into consideration
25 when evaluating the plans.

26 I would like to specifically address the human

23 1 element involved in the planning of the real evacuation in
2 case of an accident. It was mentioned earlier that the
3 exercise proceeded well, that there was dynamic and
4 enthusiastic participation by officials involved.

5 Well, it was just a drill. Everyone is
6 well aware of the tendency of the population to panic in
7 the case of a real accident, and the related tendency of
8 officials to downplay the dangers in the case of a large
9 release of radioactivity.

10 I would like to raise a point that the general
11 population does not somehow magically exclude public
12 officials charged with orchestrating an evacuation.
13 It does not exclude doctors and nurses and hospital staff
14 who might have to deal with the immediate injuries and
15 illnesses. These people, I would imagine, are human beings
16 just like myself and the general public that they wouldn't
17 want to be staying in the area either.

18 Referring to the question raised earlier about
19 evacuating the schools, I believe I heard the response that
20 buses can be used more than once. Does that mean that the
21 bus driver would pick up one load of children and drop them
22 off at a supposed safe distance and then return and pick
23 up another load of children?

24 I didn't really understand how that question
25 was answered.

26 It seems also most crucial to an evacuation

24

1 that the central plan and direction of the evacuation be
2 well-orchestrated. I understand that the evacuation
3 headquarters in the case of a serious accident is right
4 here where we are standing in San Clemente City Hall, which
5 of course is within ten miles of the plant. Is that true?

6 MR. SANDWINA: The emergency operating facility
7 which would provide those technical recommendations of
8 those projections, those estimates, is located here in part.
9 There is a computer link between the emergency operating
10 facility and the onsite technical support center belonging
11 to the utility.

12 MS. GROEBEL: So, that is to say that certain
13 officials that are crucial to the orchestration of the
14 evacuation and so on would have to remain here?

15 MR. SANDWINA: If your question is will the EOF or
16 EOC here relocate because of the emergency itself, alternate
17 relocation sites are an element of planning and need to be
18 considered, that is correct.

19 MS. GROEBEL: Thank you.

20 MR. JACOBSON: My name is Jim Jacobson. I am from
21 the City of San Diego. I know after Three Mile Island both
22 the Kemeny Commission and the Rogovin Study made
23 recommendations about evacuation zones. I think they were
24 within not ten miles but more like 20 to 30 miles. I
25 would hope that the various agencies involved would review
26 what these commissions have recommended and consider extending

1 the zone at least 25 miles and also look into the fact that
2 the County of San Luis Obispo regarding the Diablo Canyon
3 Plant, the county there, the Emergency Planning Agency and
4 the Board of Supervisors have since endorsed a 35-mile
5 evacuation zone.

6 Also in all these discussions, I think that
7 we're eliminating or ignoring some resources along the
8 coast here that in the event of an earthquake, for example,
9 all it would take would be one bridge crossing I-5 to
10 collapse, and you will have a real problem.

11 In terms of evacuation, I would like to see
12 everyone's plans and FEMA also recommend that there be some
13 seaward evacuation considered. There are thousands of boats
14 in our harbors along the coast. I would like to see harbor
15 masters involved.

16 Every boat owner should be contacted and
17 consider taking people aboard and evacuating to sea, if
18 necessary, and then going to the Los Angeles area or
19 possibly south to San Diego. I think that this has not
20 been considered, and a seaward evacuation would be a very
21 valuable resource to consider. Thank you.

22 MR. KEARNS: Point of clarification. In San Luis
23 Obispo County the 35-mile zone is, as I indicated earlier,
24 a combination of the primary evacuation zone and an extended
25 zone which includes sheltering of the population. The
26 evacuation zone at San Luis Obispo County encompasses the

1 City of San Luis Obispo, which is approximately 15 to 18
2 miles. The remainder of the zone is again in the extended
3 zone where we will be working with the counties to develop
4 the most effective protective matter for public health and
5 safety.

6 So, there is no 35-mile evacuation zone in the
7 County of San Luis Obispo.

8 MS. BORKLAND: My name is Sissy Borkland. I am a
9 resident of San Clemente. Before I ask my question, I
10 would like to read an excerpt from the Rogovin study where
11 they say, "We have found that the Nuclear Regulatory
12 Commission itself is not focused, organized or managed to
13 meet today's need, and in our opinion the Commission is
14 incapable in its present configuration of managing
15 a comprehensive national safety program for existing nuclear
16 power plants, and those scheduled to come in line in the
17 next few years, adequate to insure the public's health and
18 safety.

19 We found that before March 28, 1979, an attitude
20 of complacency pervaded both the industry and the NRC,
21 an attitude that engineered design safeguards built into
22 today's plants were more than adequate, that an accident
23 like that at Three Mile Island would not occur, in the
24 peculiar jargon of the industry, that such an accident
25 was not a credible event."

26 I would like to ask what can be done to cause

1 the NRC to consider the evacuation protection five years
2 from now when the population has doubled here.

3 MR. SANDWINA: Thank you.

4 MR. HYDE: I am Don Hyde of the City of Riverside.
5 I have a couple questions, but first I read in the final
6 environmental statement that at certain times of the year,
7 especially in wintertime, there is an inversion layer in
8 this area. So, I don't see a plan presented from cities
9 south of the plant, like Oceanside and Carlsbad, and that
10 really shocks me.

11 My question is is Riverside required to come
12 up with any kind of a plan in the event of a nuclear
13 accident at San Onofre. Parts of Riverside County are
14 closer than many parts of San Diego and Orange County.

15 The City of Elsinore is within the SAI Study's
16 Extended Planning Zone. My question is is Riverside
17 required to participate in the planning?

18 MR. NAUMAN: The answer is yes. Portions of
19 Riverside County are within, I believe, the 50-mile ingestion
20 pathway area but not within the ten mile period.

21 MR. SANDWINA: Jack, do you want to offer a comment
22 on this area?

23 MR. KEARNS: Yes. Again, I emphasize the zones
24 that we've described incorporate both the primary and an
25 extended zone. Riverside County, portions of it, are
26 within the primary zone; but it is our understanding there

28 1 isn't population within that area. It is the very small
2 little tip of Riverside County. Elsinore is included in the
3 extended zone. In addition to the 50-mile ingestion
4 pathway, Riverside County will be involved in the formulation
5 of a plan regarding the handling of contaminated food and
6 water.

7 MR. HYDE: I heard one of you gentleman make a
8 statement prior to the start of the public hearing that it
9 was in the interest of all bodies involved that a plan be
10 implemented very quickly or at least be drawn up very
11 quickly. In light of the information we have received here
12 this evening, I would like to know if you still believe that
13 that is in the better interest of the public, and also
14 could you reiterate the specific dates that are coming up
15 as far as how this plan is supposed to be processed?

16 MR. SANDWINA: Well, I didn't make the comment. I
17 don't know. I can express a personal opinion about that.
18 I believe that it is very important to do what we can to
19 protect the public and to develop the offsite emergency
20 preparedness as quickly as we can. I think from what I
21 have observed in this part of California that the local
22 jurisdictions along with the utility and the state are
23 working very hard at developing those capabilities and
24 improving the plans.

25 I think that's a positive step. I don't have
26 any -- and I know of no specific time table to accomplish

1 that ultimate product. Maybe Mr. Kearns of the state office--

2 MR. KEARNS: I believe it was in my statement that
3 I gave a date, and it was with reference to the Memorandum
4 of Understanding and a letter from Mr. Grimes to FEMA.

5 The NRC is requiring FEMA to submit findings
6 and determinations by June 1, 1981, as to whether the
7 state and local emergency plans that support the San Onofre
8 Nuclear Generating Station Units II and III are adequate
9 and capable of implementation.

10 I believe that's what he is referencing.

11 MR. SANDWINA: If that is what you were referencing,
12 sir, then that's true; and we have been asked to provide
13 some findings and say, tell it like it is, you know, what
14 are the facts today, what's the status of the plans and
15 the offsite emergency capability.

16 MRS. NEWSUM: I am just curious about this extended
17 area that Mr. Kearns keeps talking about. I don't under-
18 stand what sheltering is.

19 MR. SANDWINA: Can I have her name and residence?

20 MRS. NEWSUM: My name is Linda Newsum, and I live in
21 San Diego. I just wanted to know what preparations have
22 been made for this sheltering that has to occur, how many
23 people can be accommodated this way, how food and water and
24 everything else is going to be insured and whether or not
25 we have to show any evidence of this preparedness, or if we
26 are just supposed to take his word that we are prepared for

30 1 a larger emergency area.

2 MR. KEARNS: First of all, in the study that was
3 conducted by Science Applications Incorporated, they
4 defined certain -- or based upon the information provided
5 to us by them-- we defined certain zones that we felt -- and
6 which evacuation plans were essential if we were to protect
7 public health and safety.

8 We also defined some zones in which we felt
9 some actions had to be taken to prepare the public for
10 appropriate counter measures, possibly including the
11 evacuation, but most assuredly including shelter.

12 When we say shelter, we mean shelter in the
13 home in the necessity that the evacuation cannot be
14 carried out by virtue of discharge of a puff or release from
15 the plant. A home does offer protection from the radiation
16 that is being released.

17 MRS. NEWSUM: For how long? What are we talking
18 about?

19 MR. KEARNS: We are talking about very short periods
20 of time. If we had a lengthy period of time, then we would
21 accomodate evacuation beyond the ten-mile zone; but we feel
22 that there is a zone in which evacuation plans must be
23 developed so that they can be implemented in a timely
24 manner.

25 Now, as I have indicated, it varies from ten
26 miles approximately at San Onofre to the 15 to 18 miles at

31 1 San Luis Obispo County.

2 MRS. NEWSUM: How are people notified that they
3 are supposed to stay in there, and how do they get food and
4 stuff?

5 MR. KEARNS: That is part of the planning process.
6 As far as food is concerned, it is not presumed that the
7 individuals would be in the shelter long enough to necessitate
8 additional food supply.

9 MRS. NEWSUM: You're talking about two or three
10 days?

11 MR. KEARNS: No, we're talking about a matter of
12 hours at the most.

13 MRS. NEWSUM: And then what?

14 MR. KEARNS: They would have to be relocated from the
15 area out to a previously designated congregate care
16 facility.

17 MRS. NEWSUM: But there are no evacuation plans
18 beyond the ten miles at this point, though?

19 MR. KEARNS: That's correct.

20 MRS. NEWSUM: In the event of an emergency after a
21 few hours you decide that a larger area needs to be
22 evacuated, what happens?

23 MR. KEARNS: Well, presumably if a larger area needs
24 to be evacuated, an evacuation can be carried out on an
25 ad hoc basis beyond that zone.

26 MRS. NEWSUM: Has that been demonstrated in an area

1 this densely populated?

2 MR. KEARNS: Yes, we have evacuated some 80,000
3 people below the Van Norman Dam at the time of the San
4 Fernando earthquake when it appeared that there was a crack
5 in the dam. It was carried out in orderly fashion, and yes,
6 it has been done.

7 MRS. NEWSUM: How long did it take?

8 MR. KEARNS: It took a matter of hours. Evacuation
9 has been carried out extensively in the south --

10 MRS. NEWSUM: You are not talking about radiation --

11 MR. SANDWINA: I think it is getting very difficult
12 for Mr. Kearns to respond to it, and it is getting difficult
13 for me certainly to track it. I think what -- I don't --
14 I can't put words in your mouth, Jack.

15 What I would like to say under the circumstances
16 is that the Federal criteria has provided for a ten-mile
17 EPZ and a 50-mile emergency planning zone for the inhalation
18 and ingestion pathways.

19 That's what we are looking at here. There is
20 a different set of criteria, and there are some site
21 specific things that need to be taken into account. I think
22 the state planning and the state guidance and requirements
23 when they are issued formally and when local jurisdictions
24 must comply with those and say something else, that would
25 be expansion of the federal criteria.

26 MR. KEARNS: The guidance has been issued.

1 MR. SANDWINA: Yes. One of the protective actions
2 that we have been talking about, sheltering and evacuation
3 are several; and they are, I believe, related to the nature
4 of the problem, the nature of the release, the time factors
5 involved and so forth. It may be that it is far easier and
6 better protection to keep someone in place for a shorter
7 period of time than to direct an evacuation under
8 circumstances where their exposure might be less.

9 MRS. NEWSUM: I still feel like my question hasn't
10 been adequately addressed.

11 MR. SANDWINA: Well, there are no, at this stage of
12 the game, evacuation plans, to the best of my knowledge,
13 outside of the ten-mile EPZ.

14 MR. BOTHAMLEY: My name is Bill Bothamley. I live
15 in the City of San Diego. I just wish to make a comment
16 here that I was very interested in hearing this exchange.
17 It seems like we were touching upon some very crucial
18 unanswered questions. I noticed that in your role of
19 moderating you have often stifled some of this interchange
20 exchange that I think is invaluable if we are to feel safe
21 and secure and feel that these plans have adequately been
22 thought out and that we are adequately protected.

23 So, I wish that you would allow a little bit
24 more debate even if it means that somebody is temporarily
25 on a hot seat. I think that that's okay. I would like to
26 hear whatever answers these people can give us. These are

34 1 very crucial questions that we are asking. Thank you very
2 much.

3 MS. WINTER: May name is Tanja Winter. I was here
4 before. I just wanted to say that I think that exchange
5 does show that a certain number of people in the society are
6 expendable and that the requirements by the NRC or by the
7 state or by any other agency really address the needs of the
8 agencies to satisfy the requirement on paper. I don't think
9 anybody seriously believes that we could do anything in a
10 serious nuclear accident.

11 I think that all of the people are going
12 through these motions because that's what they are required
13 to do, and nobody is honest enough to say that it really
14 is not going to work and we know it is not going to work.

15 (Applause)

1A 1 MR. KEARNS: That's basically a rhetorical
2 question; nevertheless, I will answer. Basically, it is.

3 The State of California has not said there
4 are expendable people. We have not accepted the ten-mile
5 zone. We have conducted a study. Based on that study, we
6 have developed to the best of our ability what we feel are
7 the proper planning zones to protect public health and
8 safety. The Nuclear Regulatory Commission's philosophy has
9 been planning beyond the ten miles can be done on an ad hoc
10 basis.

11 We did not agree with that. That was the whole
12 basis for the study. That has been the basis for the
13 Extended Planning Zones and the effort that we have been
14 trying to put into it. So, we do not feel that people are
15 expendable or that we are simply going to shrug our shoulders,
16 accept the ten-mile zone and say the heck with it.

17 (Applause.)

18 MR. CARSTENS: We in this exercise have used San
19 Clemente as the headquarters, right, for this exercise,
20 right?

21 MR. SANDWINA: The question is, has San Clemente
22 been used as headquarters for the emergency center. San
23 Clemente has its own jurisdictional Emergency Operating
24 Center, plus it has an Emergency Operating Facility
25 co-located with it.

26 MR. CARSTENS: The question is, in the event of

1 an accident, is San Clemente Emergency Center -- or have
2 you determined one and where is it?

3 MR. COLEMAN: Perhaps I should be the one to
4 respond to that, because as I made in my introductory
5 remarks at the beginning of this, our plan is based upon
6 the California Emergency Service law which fixes the
7 responsibility for protection of life and property at local
8 government level. To be very candid about it, we have been
9 fighting very, very hard over this issue as to where that
10 EOC-EOF operation should be. One of the inferences of why
11 we believe that it should be located where it is is because
12 it is our population that we are concerned about. It is
13 our people that is the vast majority of concern for
14 evacuating the corporate city limits of San Clemente.

15 The Emergency Operations Center is located
16 in conjunction with the City's Emergency Operations Center
17 for several reasons. One is the communication links, which
18 we have dedicated telephone lines, computer circuits, our
19 City's Emergency Operations telephone system, our alarm
20 receiving center, so that we can handle public inquiry and
21 input and as it was mentioned earlier, rumor control.

22 We will readily admit that the EOC is not a
23 hardened facility. In technical terms, that means it has
24 got fallout capability and all of that other stuff. But
25 from a practical standpoint, in order to control an evacua-
26 tion, it has to be individuals, the Chief of Police, Fire

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1 Chief, City Manager and so forth, in an area where they can
2 control such things as the assembly points, traffic
3 circulation locations and so forth.

4 In our plan it is anticipated that -- in fact,
5 there are two different planning zones. There is a two-
6 mile circle, a five-mile circle and a ten-mile circle. It
7 is anticipated in our plan that the primary decisions that
8 would be made in order to justify -- or not justify but to
9 predict potential dose rates would come from what we call
10 the ODAC, or Offsite Dose Assessment Center, located here
11 in our Emergency Operations Center. From a practical point
12 of view, we have got to protect our public safety people
13 in order to get the civilians out.

14 I am a little disappointed by one of the
15 statements made by one of the ladies that we really don't
16 care, because we really do care. People like myself and
17 the policemen in our city will be the last people to leave
18 this town if we ever have an evacuation, not the first. Our
19 Emergency Operations Center is located in the city for the
20 specific purpose that we have to be here to control the
21 evacuation and to maintain credibility for the control of
22 the evacuation, rather than fleeing the corporate city
23 limits and allowing somebody else to make that decision for
24 us.

25 MR. CARSTENS: There is a mistake in your statement.
26 In the first place, your emergency center is only a few

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1 miles from the plant.

2 MR. COLEMAN: Five miles.

3 MR. CARSTENS: All right. Five miles. Now, no
4 one can possibly conceive that if you have any kind of an
5 accident or any kind of an earthquake -- you would be
6 overwhelmed; so would your emergency center be overwhelmed.
7 Therefore, you would be ineffective. Now, the fact you say
8 that you don't have a hardened center underground just like
9 the Pentagon has and so forth, you are fully exposed. You
10 people are human. You are going to get the big dose, and
11 then you are going to be inoperative. What happens to your
12 emergency center? I think your emergency center should be
13 further away, or if it is going to be here, that it should
14 be a hardened site.

15 MR. COLEMAN: I would agree with that.

16 MR. CARSTENS: The fact that you are so concerned
17 about -- it is a natural thing for San Clemente. However,
18 there are people, of course, within 20, 30 miles that are
19 just as concerned as you are about their people. Now, it
20 is a tremendous mistake for this group or any group to think
21 that they should have an emergency center five miles from
22 the plant. It is absolutely absurd, because you are going
23 to be overrun and then it has disappeared. What kind of
24 thinking is that? That's stupid.

25 MR. COLEMAN: Well, to reiterate the position, as
26 I said before, you have to go back and look at the basic

1 responsibilities.

2 MR. CARSTENS: That's what we're doing.

3 MR. COLEMAN: And we believe we are also. The
4 ten-mile zone, as I mentioned, and I hate to repeat myself,
5 but the ten-mile zone takes in the entire city limits. We
6 have, through interagency agreement, co-opted with San Diego
7 and Orange County as far as what we would do in making the
8 decisions to start moving people. We have -- I am going to
9 be very candid about it. When I say "we," I am speaking of
10 a rhetorical "we." Myself and other operating department
11 heads feel that our Emergency Operations Center is by far
12 the most logical place to start this process. No one says
13 that it will end there.

14 MR. CARSTENS: Suppose it gets overwhelmed. Where
15 is your second fallback or your third?

16 MR. COLEMAN: We have several.

17 MR. CARSTENS: What is the name of them? Where
18 are they located?

19 MR. COLEMAN: Saddleback College is our first
20 fallback position, and the second one is the Emergency
21 Operations Center for Orange County.

22 MR. CARSTENS: Wait a minute; that's in Santa Ana?

23 MR. COLEMAN: Yes, it is.

24 MR. CARSTENS: Why not put it there in the first
25 place?

26 MR. COLEMAN: For several reasons. One of them

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1 has to do -- I think if you had witnessed some of the
2 problems that we have associated with communications, rumor
3 control and so forth, it is absolutely essential that the
4 front-line decision making be in an area where we can deal
5 with it. There are two different parts of an evacuation.
6 One is to control the evacuation. The other is to house or
7 become a host area. In our current plan, Orange County is
8 the host area. They are the ones who are the relocation
9 centers and so forth.

10 I don't know if I am making my point quite
11 clear. I think those of us who have worked in this plan
12 realize that the policemen in the field, the Public Works
13 people who are putting up barricades, the firemen doing
14 radiological monitoring -- they are the resources that we
15 have to apply to start that evacuation process if it, in fact,
16 ever occurs; and they are under the control of the local
17 jurisdiction.

18 The Emergency Operations Center is a function.
19 It is not a place. By virtue of that, sometimes the location
20 center has to be relocated. As a matter of fact, during this
21 drill it was anticipated that it be relocated. But we still
22 believe that we are the seat of government, and we have to
23 fulfill our responsibility.

24 MR. CARSTENS: My friend, you are a very little
25 town, and you only have a few people there -- the police
26 chief, fire chief, mayor, so on. You don't have the people

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1 to engage in any kind of direction of this vast character.
2 I mean, it is so ridiculous that you little people here --
3 two or three people are going to direct this vast thing.

4 MR. COLEMAN: No, sir.

5 MR. CARSTENS: Yes, it is.

6 MR. COLEMAN: No, I said, no, sir, I don't believe
7 we are alone in this responsibility.

8 MR. CARSTENS: Have you got 40, 50 people on tap --
9 trained people that are going to move this little place in
10 this little area that you have got here and direct this?

11 MR. COLEMAN: Without debating the actual implemen-
12 tation -- or excuse me, the inventory of resources in our
13 plan, one of the things we have stated is the fact that we
14 do have problems of that nature, and we are constantly working
15 on these issues.

16 MR. CARSTENS: Who is financing that? Suppose you
17 need 50 people? Who is paying these extra people if you need
18 them to act as emergency service?

19 MR. COLEMAN: You say who is paying them for the
20 exercise?

21 MR. CARSTENS: I am talking about if you need 20,
22 30, 40 people in San Clemente in order to do this job,
23 assuming that you can -- which I don't believe you can --
24 but if you do, who is going to pay these people? You
25 haven't got the resources in this little town to do that.

26 MR. COLEMAN: I don't have the answer to that one.

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1 That is, once again, an ambiguous question for me to reply
2 to.

3 MR. CARSTENS: Why don't you have the answer? You
4 are the headquarters, you ought to have some answers.

5 MR. COLEMAN: What I am saying, sir, is that we
6 do have an inventory of individuals involved. We have in
7 our plan the execution of all the mutual aid resources that
8 are available to us through the County. We recognize the
9 fact that we don't have all the people required to do all
10 the jobs. But I would like to bring to everyone's attention
11 the fact that we are not making these value judgments in a
12 vacuum.

13 You heard my City Manager earlier this evening
14 talk about the fact that, as we refine this process, we
15 constantly find out more and more about what we need to do.
16 In the process of developing our evacuation plan, we used
17 the document that was produced by the Disaster Research
18 Center and the University of Ohio, called "Evacuation
19 Behavior and Problems, Findings and Implementations." It
20 is a document actually produced for FEMA. It is one of the
21 ones that was done in the research project.

22 We have looked at Three Mile Island. My staff
23 has researched the implications of a lot of the statements
24 made here this evening. We don't have all of the answers,
25 but I can assure you that some of the statements being made
26 that perhaps we are looking at this from a bureaucratic point

9A 1 of view are not necessarily valid when it comes to the
2 people who are working here in the City of San Clemente.

3 MR. CARSTENS: Just one thing, my friend. You say
4 you are refining the process. On the other hand, these
5 gentlemen want to rush this through and have this report
6 ready by June the 1st, and this is May the 17th; and they
7 have just had a hearing on the thing here. Everyone gets
8 up here and says we are refining the process. How long are
9 you going to do it before we are sure, the public, that you
10 finally got it refined and workable? That's the point.

11 I mean, you started way back there, and now
12 you are halfway or one-quarter of the way; but we want --
13 the public wants to know whether you have a finished plan,
14 not a theoretical plan -- and the government too. We are
15 not going to stand for it. I don't care what you do with
16 the process, we are not going to stand for your having an
17 Alice in Wonderland, Rube Goldberg contraption of an
18 evacuation plan. Thank you very much.

19 MRS. NEWSUM: I just have another question about
20 what happens after this particular hearing tonight. Is there
21 going to be another scheduled drill or something, or are they
22 going to have a chance to practice a few more times and get
23 it straight before San Onofre goes on the line, or is the
24 plan to go on the line first and we hope that everybody's
25 got their act together by the time the accident happens?

26 MR. SANDWINA: I believe that there will be, there

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1 certainly have been, certainly, and there will continue to
2 be, exercises and drills; and I know that many of the things
3 we have observed in this past week here will cause us to see
4 some things, to reveal some things that the local juris-
5 dictions and we, too, perhaps, will have to focus our
6 attention on. I don't know if this is the end. I don't
7 think so. We certainly will be providing our input to the
8 NRC, and in those hearings they will consider the situation
9 and our findings, I suppose, at that time.

10 By the way, this is not a hearing conducted
11 in the same legal sense that I believe the NRC will be
12 conducting in its hearings, and that's evidenced, I think,
13 by some of the debate we got into.

14 MRS. HICKS: I think the young lady's question is
15 a very good one from the standpoint that this took place,
16 this simulation drill took place because FEMA required it
17 and Edison Company very much wanted it and needed it.

18 MR. SANDWINA: That's not true.

19 MRS. HICKS: It is not true?

20 MR. SANDWINA: That is incorrect.

21 MRS. HICKS: Why did it take place?

22 MR. SANDWINA: It took place because the partici-
23 pants, the local jurisdictions involved, felt it was time
24 to do it, and they were looking for an exercise where they
25 could identify the abilities or inabilities to execute.

26 MRS. HICKS: I don't know about some of the outside

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1 jurisdictions, but I know that the near ones, the State Parks
2 and the City, knew that they were not ready for really doing
3 a comprehensive exercise. We participated because FEMA
4 requires it.

5 MR. SANDWINA: We do not.

6 MRS. HICKS: And we wanted to be cooperative.

7 MR. SANDWINA: I need to remind you we do not
8 require that. This is not our exercise.

9 MRS. HICKS: But the point is we have no method
10 worked out for notifying the public of problems, of educating
11 the public beforehand. We have a system by which to notify
12 the public of an accident. We have no system by which to
13 get radiological information that is site specific, on-site,
14 two miles, three miles. We have not the meteorological
15 capability of providing that same type of information.

16 We have not the capability for providing
17 transportation for our special population such as the people
18 in the care facilities and the nursing schools and the
19 hospitals and that sort of thing. We have not the facilities
20 for providing transportation for our schools. We have no
21 way worked out for judging whether or not the area has been
22 evacuated if we need some way of letting people know that
23 they should evacuate.

24 I don't think anyone here pretends that we
25 are ready. The point is that we won't have a comprehensive
26 coordinated exercise. We will be left standing with just

12A 1 this little drill of our internal and our interagency
2 communications system. That's what it was, with a pretend
3 on all these other scores.

4 Unless FEMA says this is not satisfactory,
5 you must have a comprehensive exercise -- because we don't
6 have the money for it. We don't have the financing. None
7 of us do. None of these agencies have the financing for it.
8 If Edison has to do it, then it will provide the financing.
9 If Edison doesn't have to do it, it won't happen.

10 MR. POWELL: I'd like to make a short comment on
11 that. From my perspective, I am trying to get the idea of
12 whose drill that was, then. I understand Edison designed
13 the scenario, which I think is rather convenient. If, in
14 fact, it was being requested by all these local agencies,
15 I should think that they would maybe want to have a little
16 more input into exactly what the scenario was that was
17 supposed to cause the accident.

18 I feel like we're playing an institutional
19 bureaucratic shell game. What we're going to end up with
20 again is a totally inadequate evacuation plan and a nuclear
21 reactor on line, and the people of this county and this area
22 of Southern California are going to be the ones to pay.

23 MRS. DAVIS: One point to add to that is that it
24 is kind of curious that I heard from everyone tonight that
25 despite time constraints, we got our evacuation real together,
26 and we feel pretty good about it. Well, maybe someone could

13A 1 clarify who instigated the drill this time. Who are the
2 people who said we want the drill and this is the day we want
3 it on? That's really what I would like to know. Why
4 weren't the people given more time?

5 MR. PILMER: I'd like to talk about the timing of
6 the exercise and the reason that my company and your state
7 and local government has been involved for a number of months
8 in updating emergency plans. It comes about because of the
9 adoption of federal regulations that have mandated time
10 schedules in it. It is true we've been working under a
11 schedule pressure, but the NRC requirements for operating
12 reactors requires that upgraded emergency plans be implemented
13 as of April 1st of this year. That's a program that's going
14 on throughout the country. It is not unique to San Onofre
15 at all. That's the basic reason for the time schedule.

16 MRS. DAVIS: I just want to know -- so, you were
17 the one that instigated this particular drill on that date?

18 MR. PILMER: I think it is fair to characterize
19 state and local government as being responsive to federal
20 regulations of this type. The state schedule has been
21 closely consistent with it, but their requirements are a
22 little bit out of kilter with the federal requirements. I
23 don't know what else can be said other than the fact that
24 they are federal requirements.

25 MRS. DAVIS: I was just wondering that since there
26 are these time constraints to update, I guess you said

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1 something like evacuation planning you are under from the
2 federal government, I can understand why we have to have
3 evacuation plans; but I mean, to rush things through and then
4 accept it, and then you guys get an interim license, does not
5 make sense when we're obviously not ready for evacuation.

6 MR. PILMER: The real schedule requirement comes
7 from the fact that we have an operating reactor. That's what
8 sets the requirement. There is no requirement schedule-wise
9 for these plans for reactors that aren't licensed to operate.
10 I characterize these as upgraded plans. We have had emergency
11 plans before this time. We have had emergency plans for San
12 Onofre since it has operated beginning in 1967.

13 MRS. DAVIS: You are the only one that has ever
14 known what they were.

15 MR. PILMER: That is not so. It has been known
16 by state and local government officials throughout this
17 period.

18 MR. DAVIS: How would people be informed as per
19 the old plans?

20 MR. PILMER: There are public documents available
21 to the public that pertain to the original licensing of San
22 Onofre Unit I. These have been available. They describe the
23 plans. There is a public record of all of it.

24 MRS. DAVIS: It is our public officials that
25 haven't educated us.

26 MR. PILMER: Perhaps you personally have not been

1 educated, but there has been a public education process, yes.

2 MRS. DAVIS: Oh, is that so?

3 MR. PILMER: Yes.

4 MRS. DAVIS: Why haven't copies been made available
5 to the press or the general public?

6 MR. KEARNS: I have to concur with Dave's statement.
7 The plans have existed for some time. They dealt with what
8 was then called the low population zone around the facility.
9 Even prior to Three Mile Island, the Nuclear Regulatory
10 Commission had decided that the low population zone planning
11 was inadequate, and it was taking steps to expand those
12 plans out to ten miles.

13 In fact, the document NUREG-0396 was out for
14 public comment, and public comments were due March 31st, 1979.
15 Three Mile Island occurred on March the 28th, and that date
16 obviously was slipped. So, the plans have existed for some
17 time; and, in fact, several drills have been conducted on
18 the low population zone plans.

19 What we are talking about now are the extended
20 plans to meet the upgraded criteria of the Nuclear Regulatory
21 Commission in the ten miles and then hopefully the ultimate
22 expanded zones that the Office of Emergency Services has
23 delineated at San Onofre.

24 MRS. NEWSUM: What is considered a low population
25 zone as opposed to what we have now?

26 MR. KEARNS: At that time the cause of accidents

1 we are now considering was considered in a probability range
2 not necessitating elaborate plans. At San Onofre it was five
3 miles, four miles.

4 MR. PILMER: Really, the planning perspective
5 included what we called design basis accidents. They are
6 no longer constrained, so the plans are meant to cover the
7 full spectrum of conceivable accidents at the reactor plant.
8 The low population was zoned for San Onofre's 1.95 miles.

9 MRS. NEWSUM: So that's what existed before. In
10 other words, a plan for 1.95 miles, and that was considered
11 emergency planning?

12 MR. PILMER: That was what was required. Since
13 1976, we have had an emergency plan that envisioned an
14 evacuation up to a distance of five miles in the case of San
15 Onofre. But what was required by the NRC was a showing that
16 you had the capability to evacuate the people within the low
17 population zone.

18 MR. KEARNS: Even prior to Three Mile Island, as
19 I indicated, the Nuclear Regulatory Commission had already
20 decided that the low population zones were not adequate and
21 had taken steps to expand those out to the ten-mile criteria.

22 MRS. NEWSUM: Does low population zone mean some
23 sort of a number like the number of people that live there;
24 is that what we are talking about?

25 MR. PILMER: That term is very precisely defined
26 in the NRC's regulations, and it is determined based upon

1 the consequences of design basis accidents. It is the zone
2 within which the applicant had to demonstrate that the
3 population was small enough and that the means were available
4 to take all necessary prospective actions, including
5 evacuation. So, it is a combination of accident consequences
6 not exceeding a certain value and a population small enough
7 that was manageable to evacuate.

8 MRS. NEWSUM: Up until the time of Three Mile
9 Island, a five-mile area fit into that category in terms of
10 number of people here and, say, a Class IX accident?

11 MR. PILMER: In the case of San Onofre, yes. The
12 five miles adequately covered all of the NRC's regulations
13 at that time and then some.

14 MR. MANDA: Ladies and gentlemen, I am going to
15 thank you for your concerns and your comments and suggestions.
16 We do have a responsibility to evaluate these comments and
17 suggestions. Thanks again for coming out tonight and for
18 your interest in the program.

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20 (END OF HEARING.)
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REPORTER'S CERTIFICATE

I, Martha Loggins, a Certified
Shorthand Reporter and a Notary Public of the State of
California with principal office in the County of Orange, do
hereby certify that the foregoing proceeding was written by
me in Stenotypy, and transcribed into typewriting and that
the foregoing is a true and correct copy of my shorthand
notes thereof.

Martha Loggins

Dated: MAY 22 1981