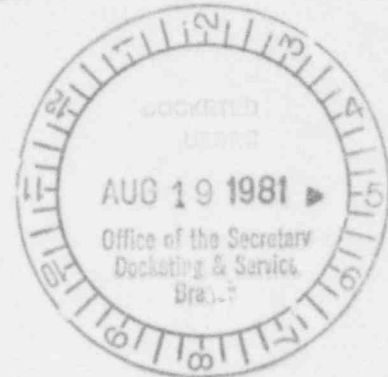


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13 UNITED STATES OF AMERICA
14 NUCLEAR REGULATORY COMMISSION
15 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
16

18 In the Matter of)

19 SOUTHERN CALIFORNIA)
20 EDISON COMPANY, ET AL.,)

21 (San Onofre Nuclear)
22 Generating Station,)
23 Units 2 and 3))

Docket Nos. 50-361 OL
50-362 OL

24 REQUEST FOR CERTIFICATION
25 TO THE NUCLEAR REGULATORY
26 COMMISSION

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11

1 Applicants Southern California Edison Company and
2 San Diego Gas & Electric Company ("Applicants") hereby
3 request, pursuant to 10 C.F.R. §2.718(i), that this Atomic
4 Safety and Licensing Board ("Board") certify the following
5 questions to the Nuclear Regulatory Commission ("Commission"):

6 Whether the Board has improperly abused its
7 discretion and its sua sponte powers (10 C.F.R. §2.760a) by
8 requiring, without factual basis, and in excess of the
9 Commission's regulatory requirements, consideration of
10 emergency planning features following:

11 (1) An earthquake in excess of the Safe Shutdown
12 Earthquake ("SSE") which is assumed, without
13 factual basis, to cause a major radiological
14 release and evacuation in the plume exposure
15 pathway of the Emergency Planning Zone
16 ("EPZ"), and/or

17 (2) An earthquake in excess of the SSE which is
18 assumed to occur coincident with a
19 non-earthquake related radiological release
20 requiring evacuation in the plume exposure
21 pathway of the EPZ.

22 This request for certification is made necessary by
23 the Board's "Order, (Modifying an Issue Concerning
24 Earthquakes and Emergency Planning)," dated August 7, 1981.
25 The request for certification is based on this document, the
26 above described Order dated August 7, 1981, Applicants'

1 "Memorandum of Points and Authorities in Support of Request
2 for Certification to the Nuclear Regulatory Commission" and
3 "Memorandum in Opposition to Issue Raised Sua Sponte by Order
4 of August 7, 1981" and the (Proposed) Order Certifying
5 Emergency Planning Contention to the Nuclear Regulatory
6 Commission filed herewith, the record in the above-captioned
7 proceeding and any and all oral or documentary evidence and
8 argument as may be presented.

9 Due to the importance of this issue and the
10 approaching date for the commencement of the hearing,
11 Applicants urge that the Licensing Board consider this
12 Request on an expedited basis and that other parties' replies
13 be required three (3) days after receipt hereof with service
14 by Express Mail or other expedited delivery.

15 Dated. August 17, 1981

16 Respectfully submitted,

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