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18 and San Diego Gas & Electric Company



19 UNITED STATES OF AMERICA
20 NUCLEAR REGULATORY COMMISSION
21 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

22 In the Matter of)
23)
24 SOUTHERN CALIFORNIA EDISON)
25 COMPANY, et al.)
26)
(San Onofre Nuclear)
Generating Station Unit 2))

Docket No. 50-361 OL

27 ALTERNATIVE
28 MOTION OF APPLICANTS
29 SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.
30 FOR AN OPERATING LICENSE FOR FUEL LOADING
31 AND LOW-POWER TESTING



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1 Applicants Southern California Edison Company, San
2 Diego Gas and Electric Company, and the cities of Riverside
3 and Anaheim ("Applicants") will be ready to commence fuel
4 loading and low-power testing of the San Onofre Nuclear
5 Generating Station Unit 2 ("SONGS 2") on or about October 15,
6 1981. Under the original hearing schedule, potential delays
7 in the operation of SONGS 2 appeared to be only moderate.
8 However, on August 7, 1981 the Board issued an order
9 dramatically expanding the potential scope of these
10 proceedings, leading to the likelihood of substantially
11 increased delays in operation of SONGS 2.

12 Applicants would prefer that the original schedule
13 be restored and that a full-power operating license be issued
14 expeditiously. To that end, Applicants have requested the
15 Board to certify to the Commission the appropriateness of the
16 Board's issue. However, if at the end of the originally
17 scheduled emergency planning hearings (currently underway),
18 the Board considers the record inadequate to support issuance
19 of a full-power operating license, Applicants hereby move,
20 pursuant to 10 C.F.R. §50.57(c), for an operating license for
21 SONGS 2 authorizing Applicants to (1) load fuel, (2) proceed
22 to initial criticality, (3) perform startup testing at zero
23 power, and (4) after prior written approval of the Director,
24 Office of Nuclear Reactor Regulation, operate SONGS 2 for
25 testing at reactor core power levels not in excess of 5% of
26 its rated power (169.5 megawatts thermal) ("low-power

1 testing"). The fuel loading and testing program requested to
2 be performed by Applicants is outlined in the testing program
3 summary attached hereto as Appendix 1 and incorporated herein
4 by reference as if set forth fully herein.

5 Due to the substantial costs of delay in full-power
6 operation of SONGS 2, Applicants make this motion for
7 low-power testing only as an alternative to its pending
8 application for a full-power operating license. Because of
9 the costs of any delay, this motion should not slow the
10 current full-power licensing proceedings. However, due to
11 the added delay resulting from the Board's issue, a
12 full-power operating license will not issue until well after
13 Applicants are prepared to commence low-power testing. Such
14 delay on low-power testing will result in a corresponding
15 delay in full-power operations, with attendant costs.

16 This motion is made on the ground that all
17 requirements for issuance of the requested operating license
18 have been met as described more fully in the attached
19 memorandum of points and authorities. Issuance of the
20 requested operating license for fuel loading and low-power
21 testing will not prejudice intervenors with respect to
22 contentions that have been admitted into this proceeding.
23 Favorable findings on the matters specified in 10 C.F.R.
24 §50.57(a) can be made by this Licensing Board and the
25 Director of Nuclear Reactor Regulation.

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1 This motion is based on the motion; the attached
2 memorandum of points and authorities in support of the
3 motion; the attached proposed order; the record of this
4 proceeding; and such further documentary evidence as may be
5 filed herein or such oral argument of counsel as may be
6 presented at a hearing on this motion.

7 Dated: August 31, 1981

8 Respectfully submitted,

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