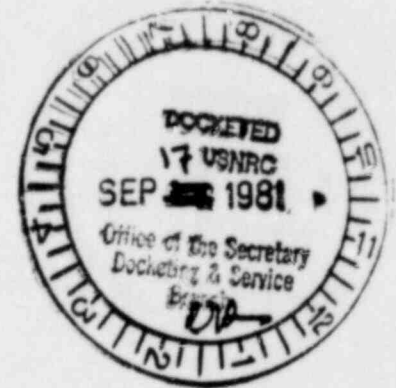


PHYLLIS M. GALLAGHER
ATTORNEY AT LAW
695 WEST CRESCENT AVENUE, SUITE 222
ANAHEIM, CALIFORNIA 92801
TELEPHONE (714) 776-3834

September 9, 1981

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



Dear Chairman Kelley,

GUARD has considered the issues related to the Applicants' requested low power license and proposes two additional issues for consideration, along with Applicants' proposal. The two additional issues are:

1. Whether Applicants have sufficiently demonstrated that a radiological emergency at SONGS 2 and 3 could not cause a radiological emergency at SONGS 1.

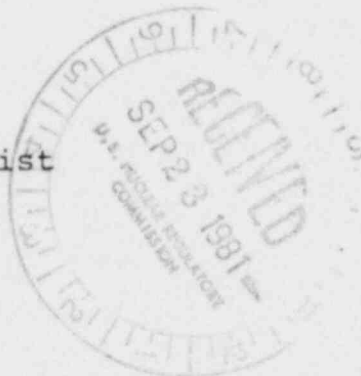
For emergency planning purposes, emergency planning decisions should be based upon the assumption that all interconnected reactors emit their postulated fission product releases simultaneously, and a low power license should not be issued without a thorough review of possible accident sequences and a risk assessment of the operation of SONGS 1, 2 and 3.

2. Whether Applicants have met the requirements of the TMI Action Plan as regards:
 - a. Instrumentation for inadequate core cooling.
 - b. Environmental qualification of electrical equipment.
 - c. Thermal shock.
 - d. Small break loss of coolant accident.
 - e. Ignitor hydrogen ignition system.
 - f. Release and safety valve testing.

Very truly yours,

Phyllis M. Gallagher

cc: Service List



Phyllis M. Gallagher
Attorney for GUARD, CARSTENS
ET AL.

DS03
5
1/1

DOCKET NUMBER 50-361,362
PROD. & UTIL. FAC.

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of September,
1981, a copy of the 9/9/81 letter to Chairman Kelley re: Issues
related to Applicant's request for low-power license.

was served upon each of the following by depositing in the
United States mail, first-class, postage prepaid, addressed as
follows:

* James Kelley, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

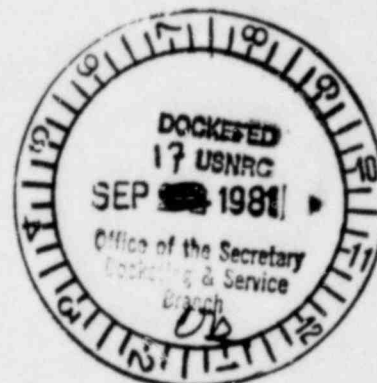
* Dr. Cadet H. Hand, Jr., Member
Director, Bodega Marine Laboratory
University of California
P.O. Box 247
Bodega Bay, CA 94923

* Dr. Elizabeth Johnson
Atomic Safety Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Janice E. Kerr, Esq.
J. Calvin Simpson, Esq.
Lawrence Q. Garcia, Esq.
California Public Utilities Commission
5066 State Building
San Francisco, CA 94102

* mailed via express mail



David W. Gilman
Robert G. Lacy
San Diego Gas & Electric Company
P.O. Box 1831
San Diego, CA 92112

Robert Dietch, Vice President
Southern California Edison Company
P.O. Box 800
2244 Walnut Grove Avenue
Rosemead, CA 92770

John Bury, General Counsel
Charles R. Kocher, Esq.
James A. Beoletto, Esq.
Southern California Edison Company
P.O. Box 800
2244 Walnut Grove Avenue
Rosemead, CA 92770

Alan R. Watts, Esq.
Rourke & Woodruff
California First National Bank Building
1055 North Main Street, Suite 1020
Santa Ana, CA 92701

Mrs. Lynn Harris Hicks
GUARD
3908 Calle Ariana
San Clemente, CA 92672

Mr. Lloyd von Haden
2089 Foothill Drive
Vista, CA 92803

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

*David R. Pigott, Esq.
Samuel B. Casey, Esq.
John A. Mendez, Esq.
Edward G. Rogin, Esq.
Of ORRICK, HERRINGTON & SUTCLIFFE
A Professional Corporation
600 Montgomery Street
San Francisco, CA 94111

*mailed via express mail

Richard J. Wharton, Esq.
University of San Diego
School of Law
Alcala Park
San Diego, CA 92110

Charles E. McClung, Jr., Esq.
23521 Paseo de Valencia, Suite 308
Laguna Hills, CA 92653

A. S. Carstens
2071 Caminito Circulo Norte
Mt. La Jolla, CA 92037

DATED: Sept. 9, 1981.

Phyllis M. Gallagher
PHYLLIS M. GALLAGHER
Attorney for GUARD