

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



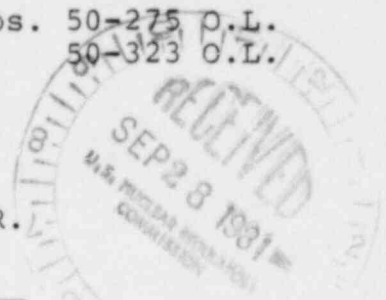
In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

(Diablo Canyon Nuclear Power)
Plant, Unit Nos. 1 and 2))

Doc et Nos. 50-275 O.L.
50-323 O.L.

RESPONSE OF GOVERNOR EDMUND G. BROWN JR.
TO PG&E DOCUMENT PRODUCTION REQUEST
DATED AUGUST 18, 1981



On August 18, 1981, Pacific Gas and Electric Company ("PG&E") requested the Governor to produce documents for inspection and copying. Governor Brown hereby responds to this request and states:

1. The PG&E requests are so broad and burdensome that compliance is impossible within the time limits set forth in the NRC's regulations. At least an additional 6 months will be required for full response.
2. Compliance with PG&E's requests would require the State to expend more than \$1,000,000.
3. PG&E should either:
 - (a) Agree in advance to reimburse the State for the expenses incurred by the State in response to PG&E's requests; or
 - (b) Limit the requests in some reasonable manner, such as limiting the requests to documents related to Diablo Canyon.

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4. If PG&E will not undertake either 3(a) or 3(b), the Governor hereby objects to PG&E's requests, pursuant to 10 C.F.R. §§ 2.740(c) and 2.741(d), and requests the Licensing Board to issue a protective order.

The bases for the Governor's positions are set forth below.

I. The PG&E Document Production Requests

PG&E's August 18 document production requests are exceedingly broad. Indeed, PG&E requests every emergency planning document in the possession of the entire State government now, and furthermore, in the possession of any past State employee. In reality, PG&E has asked the State to conduct a virtual world-wide search to track down former employees and locate documents, regardless whether the documents relate to Diablo Canyon:

Request No. 1:

All documents in possession, custody, or control of the State of California (including the possession, custody or control of any agency or organization of the State or of any contractor, employee, consultant, or agent of the State, past or present) which relate in any way to radiological emergency planning (at Diablo Canyon or any other nuclear facility) or earthquake response or emergency planning (at Diablo Canyon or any other critical facility (nuclear, medical or otherwise)).

Request No. 2:

All documents in the possession, custody or control of the State of California (including the possession, custody or control of any agency or organization of the State, or of any contractor, employee, consultant or agent of the State, past or present) which relate in any way to State, local, Federal, or utility emergency response plans within the State of California. (emphasis supplied).

The PG&E request is particularly burdensome because the request is directed to every agency and organization of the State. Thus, PG&E states:

[T]his request for production is directed to Governor Brown as a representative of an interested state. As such, the request is directed at the State of California and all of its agencies, organization, and/or subdivisions of any kind whatsoever, including, but not limited to, the California Conservation Corps., Department of Corrections, Department of Fish and Game, Department of Forestry, Department of Youth Authority, State Fire Marshal, Military Department, California Highway Patrol, Department of General Services, Department of Justice, Department of Transportation, Air Resources Board, Department of Food and Agriculture, Department of Aging, Department of Motor Vehicles, Department of Parks and Recreation, Department of Rehabilitation, Department of Veteran's Affairs, Department of Conservation, Department of Education, Department of Finance, Department of Industrial Relations, Department of Water Resources, Energy Resources Conservation and Development Commission, Public Utilities Commission, Office of Emergency Services, and the State Personnel Board. All documents in the possession of the State of California are to be produced, whether they be located in headquarter offices, regional offices, or local offices or any subdivision thereof. (emphasis supplied).

II. The Governor's Efforts to Comply with PG&E's Production Requests

The Governor, from the outset, has been concerned that PG&E's request amounted to a blatant "fishing expedition," without any focus on those documents in the possession of the State which might in fact relate directly to Diablo Canyon or be helpful to PG&E in this proceeding. The Governor's counsel expressed this view to the Board during a conference call on August 26, 1981. While PG&E's

requests clearly may have been objectionable from the outset, the Governor nevertheless has taken these requests at face value and has diligently attempted to comply.

Thus, on August 26, 1981, the Governor's Legal Affairs Secretary, Byron S. Georgiou, sent a Memorandum to all State agencies and organizations requesting that they identify documents falling within the scope of PG&E's requests. A copy of Mr. Gerogiou's Memorandum is attached hereto as Exhibit A. A list of the 52 agencies and organizations to whom the Memorandum was sent is attached as Exhibit B.

The Governor has still not received responses from all agencies. However, the responses that have been received thus far document for the record that compliance with the PG&E request will be exceedingly costly and time-consuming. The Governor attaches hereto as Exhibits C-R the agency responses received thus far. Further responses will be submitted when they are received. The attached responses are self-explanatory in large part but we highlight certain points as follows:

The California Office of Emergency Services ("OES") is the primary emergency planning and preparedness agency for the State. Mr. John J. Kearns, OES Deputy Director, estimates that compliance by OES alone with the PG&E requests would require production of more than 1,000 cubic feet of records, requiring 18 person-years and a cost of \$450,000 in salary, \$60,000 in overhead, and \$100,000 for copying. See Exhibit C hereto.

Other agency responses also indicate the substantial costs and resources required to comply with PG&E's requests:

	<u>COST</u>	<u>TIME</u>
California Conservation Corps.	\$ 13,714.00	3 wks./100 Staff personnel
Department of Aging	432.20	October 9, 1981
Department of Developmental Services	23,292.68	2 Months
Department of Fish and Game	132,500.00	6 Months
Department of Forestry	594.34	60 Hours
Department of Health Services	550.00	10 person-days
Disaster Medical Services	50,000.00	--
California Highway Patrol	62,852.83	--
Department of Parks and Recreation	2,500.00	20 person-days

Based on the foregoing, and assuming that responses from other agencies roughly are the same as the responses received so far, it is clear that a full and complete response by the State to PG&E's requests will take many months (we estimate at least 6) and cost \$1 million or more. This does not include the time and expense incurred for counsel to review the documents to ensure that production is legally permitted. As the California Highway Patrol indicates with respect to the materials it has produced, "every document that has been provided thus far contains material that is protected from release by one or more state and/or federal

statutes." The time required for counsel to review all these materials will be substantial. Moreover, this Board would likely have to issue a Protective Order to protect such information from disclosure and require that the parties (and perhaps the Board also) execute Affidavits to comply with such Protective Order. All this would have to be done in accordance with State law, and there are preliminary legal determinations which will have to be made by the State in order to facilitate the Board in assuring the protection of information shielded from disclosure by State and/or Federal laws.

III. Requested Relief

The Governor submits that the PG&E requests are manifestly unreasonable. PG&E does not request only those documents related to Diablo Canyon, but rather every emergency planning document in the entire State and in the possession of all State employees, present and past. Such an unfocused request constitutes a clear abuse of the NRC's discovery regulations. While PG&E's motives might or might not have been concertually constructive, the effect of PG&E's requests clearly is unreasonable if not an act of harrassment.


If PG&E truly desires the requested documents, and in good faith believes that its unbridled requests will further the search for truth and the public interest in this proceeding, this Board should require PG&E to commit, in advance, to reimburse the State for the State's expenses, at least those expenses incurred to produce documents not directly related to Diablo Canyon. If PG&E is unwilling to undertake such reimbursement, it should narrow its

requests to documents which in fact are necessary and useful for this proceeding.

In the event PG&E refuses to restructure its requests or commit to reimburse the State, the Governor requests the Licensing Board to issue a Protective Order barring PG&E's discovery. Only in this way can the State be protected from PG&E's unreasonable discovery requests.

Respectfully submitted,

Byron S. Georgiou, Esq.
Legal Affairs Secretary
Governor's Office
State Capitol
Sacramento, California 95814



Herbert H. Brown
Lawrence Coe Lanpher
HILL, CHRISTOPHER AND PHILLIPS, P.C.
1900 M Street, N.W.
Washington, D.C. 20036

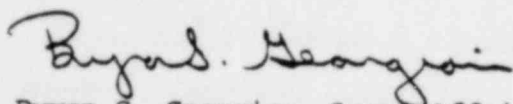
Attorneys for Governor Brown of the
State of California

September 22, 1981

Memorandum

To : All State Agencies, Departments, Boards
and Commissions

Date : August 26, 1981



Byron S. Georgiou, Legal Affairs Secretary to the Governor

Subject: Request to Identify and
Produce Emergency Planning
and Earthquake Data

From : Governor's Office

Governor Brown is participating, as representative of California, in the proceeding before the United States Nuclear Regulatory Commission ("NRC") to determine whether a full power operating license should be granted to Pacific Gas and Electric Company ("PG&E") for operation of the Diablo Canyon Nuclear Power Plant. Among other things, this proceeding addresses whether there is adequate emergency preparedness to deal with a radiological emergency at Diablo Canyon, including preparedness to take emergency actions where an earthquake complicates emergency response.

As part of the pre-trial procedures, PG&E has requested Governor Brown to produce the following types of documents:

1. All documents in the possession, custody or control of the State of California (including the possession, custody or control of any agency or organization of the State or of any contractor, employee, consultant, or agent of the State, past or present) which relate in any way to radiological emergency planning (at Diablo Canyon or any other nuclear facility) or earthquake response or emergency planning (at Diablo Canyon or any other critical facility [nuclear, medical or otherwise]).
2. All documents in the possession, custody or control of the State of California (including the possession, custody or control of any agency or organization of the State, or of any contractor, employee, consultant or agent of the State, past or present) which relate in any way to State, local, Federal, or utility emergency response plans within the State of California.

The PG&E request states further that:

[a]ll documents in the possession of the State of California are to be produced, whether they be located in headquarter offices, regional offices, or local offices or any subdivision thereof.

The PG&E request defines "documents" very broadly:

As used herein, "documents" includes, but is not limited to, papers, photographs, recordings, memoranda, books, records, writings, letters, telegrams, mailgrams, correspondence, notes and/or minutes of meetings or conversations or of telephone calls, inter-office or intra-office memoranda or written communications of any nature, recordings of conversations either in writing or upon any mechanical or electronic or electrical recording devices, notes, exhibits, appraisals, work papers, reports, studies, opinions, analyses, assessments, surveys, evaluations, projections, hypotheses, formulas, designs, drawings, manuals, notebooks, worksheets, contracts, agreements, letter agreements, diaries, desk calendars, charts, schedules, appointment books, punchcards and computer printout sheets, computer data, telecopier transmissions, directives, proposals, and all drafts, revisions, and differing versions (whether formal or informal) of any of the foregoing, and also, all copies of any of the foregoing which differ in any way (including hand-written notations or other written or printed matter of any nature) from the original.

PG&E's foregoing request for documents is unusually broad. The Governor is, of course, concerned that PG&E's request will prove to be an unreasonable burden on State resources. Nevertheless, pre-trial procedures require that the State cooperate as fully as possible. Accordingly, please do the following:

1. As soon as possible, provide to me all readily-available documents which fall within PG&E's request 1 or 2 above.
2. No later than September 16, 1981, provide to me:
 - (a) A description of the steps that your agency is taking and will need to take in order to search for the requested documents;
 - (b) The number of personnel in your agency required to accomplish the foregoing search;

- (c) The estimated time by which such search can be accomplished and all documents provided to me;
- (d) An estimate of the direct costs of copying all such documents and an estimate of the salaries and administrative costs associated with the performance of these tasks by the persons assigned to perform them.

Please contact Phillip A. Greenberg, Energy and Environment Assistant to the Governor (3-6237) if you have any questions regarding this matter. Thank you for your cooperation.

AGENCIES AND ORGANIZATIONS TO WHICH
GEORGIU MEMORANDUM OF AUGUST 26, 1981 WAS SENT

The Honorable Alice Lytle, Secretary
State & Consumer Services Agency
915 Capitol Mall, Ste. 200
Sacramento, CA 95814

The Honorable David Janssen
Director of General Services
915 Capitol Mall, Ste. 590
Sacramento, CA 95814

The Honorable Manuel Val
Director of Veterans Affairs
1227 - O Street
Sacramento, CA 95814

The Honorable Richard B. Spohn
Director of Consumer Affairs
1020 - N Street
Sacramento, CA 95814

The Honorable Philip C. Favro
State Fire Marshal
7171 Bowling Dr., Ste. 800
Sacramento, CA 95823

The Honorable Lynn Schenk, Secretary
Business, Transportation & Housing Agency
1120 - N Street
Sacramento, CA 95814

The Honorable Adriana Gianturco
Director of Transportation
1120 - N Street
Sacramento, CA 95814

The Honorable Doris Alexis
Director of Motor Vehicles
2415 - 1st Avenue
Sacramento, CA 95818

The Honorable Melinda C. Luedtke
Department of Economic & Business Development
1120 - N Street
Sacramento, CA 95814

The Honorable I. Donald Turner
Director of Housing & Community Development
921 - 10th Street
Sacramento, CA 95814

The Honorable Glendon B. Craig
Commissioner of the California Highway Patrol
2555 - 1st Avenue
P. O. Box 898
Sacramento, CA 95804

The Honorable Mario G. Oblado, Secretary
Health & Welfare Agency
1600 - 9th Street, Room 443
Sacramento, CA 95814

The Honorable Henry Zaretsky, Director
Statewide Health Planning & Development
1600 - 9th Street
Sacramento, CA 95814

The Honorable Beverlee A. Myers
Director of Health Services
714 - P Street, Room 1253
Sacramento, CA 95814

The Honorable Marion Woods
Director of Social Services
744 - P Street, Room 1743
Sacramento, CA 95814

The Honorable Al M. Loeb
Director of Mental Health
1600 - 9th Street
Sacramento, CA 95814

The Honorable Sarah Davis
Director of Alcohol & Drug Abuse Programs
111 Capitol Mall, Room 450
Sacramento, CA 95814

The Honorable David E. Loberg
Director of Developmental Services
1600 - 9th Street
Sacramento, CA 95814

The Honorable Edward V. Roberts
Director of Rehabilitation
830 - K Street Mall
Sacramento, CA 95814

The Honorable Russ Bohart
Director of Health & Welfare Agency Data Center
112 - J Street
Sacramento, CA 95814

The Honorable Janet J. Levy
Director, Department of Aging
1020 - 19th Street
Sacramento, CA 95814

The Honorable Douglas X. Patino
Director of Employment Development
800 Capitol Mall, Room 5000
Sacramento, CA 95814

The Honorable Huey D. Johnson
Secretary, Resources Agency
1416 - 9th Street, Room 1311
Sacramento, CA 95814

The Honorable Peter Dangermond, Jr.
Director of Parks & Recreation
1416 - 9th Street, 14th Floor
Sacramento, CA 95814

The Honorable Ronald B. Robie
Director of Water Resources
1416 - 9th Street
Sacramento, CA 95814

The Honorable Jan Denton
Director of Conservation
1416 - 9th Street, 13th Floor
Sacramento, CA 95814

The Honorable Marty Mercado
Director of Boating & Waterways
1416 - 9th Street, Room 1336
Sacramento, CA 95814

The Honorable E. Chas. Fullerton
Director of Fish & Game
1416 - 9th Street, 12th Floor
Sacramento, CA 95814

The Honorable B. T. Collins
Director, California Conservation Corps
1530 Capitol Avenue
Sacramento, CA 95814

The Honorable David Pesonen
Director of Forestry
1416 - 9th Street, 15th Floor
Sacramento, CA 95814

The Honorable Richard E. Rominger
Director of Food & Agriculture
1220 - N Street, Rooms 100-112
Sacramento, CA 95814

The Honorable Donald Vial
Director of Industrial Relations
525 Golden Gate Avenue
San Francisco, CA 94101

The Honorable Howard K. Way
Secretary, Youth & Adult Correctional Agency
1027 - 10th Street, Ste. 300
Sacramento, CA 95814

The Honorable Pearl West
Director of the Youth Authority
4241 Williamsborough Dr.
Sacramento, CA 95823

The Honorable Antonio Amador
Chairman, Youthful Offenders Parole Board
4241 Williamsborough Dr.
Sacramento, CA 95823

The Honorable Raymond C. Brown
Chairman, Board of Prison Terms
545 Downtown Plaza, Ste. 200
Sacramento, CA 95814

The Honorable Mary Nichols
Secretary of Environmental Affairs
1102 - Q Street
Sacramento, CA 95814

The Honorable Carla M. Bard
Chairwoman, State Water Resources Control Board
1416 - 9th Street, 10th Floor
Sacramento, CA 95814

The Honorable Terry A. Trumbull
Chairman, Solid Waste Management Board
1020 - 9th Street, Ste. 300
Sacramento, CA 95814

The Honorable Alexander Cunningham
Director, Office of Emergency Services
2800 Meadowview Road
P. O. Box 9577
Sacramento, CA 95823

Major General Frank Schober, Jr.
The Commanding General
Military Department
2329 Watt Avenue
P. O. Box 214405
Sacramento, CA 95821

The Honorable Douglas Cunningham
Executive Director
Office of Criminal Justice Planning
9719 Lincoln Village Dr.
Sacramento, CA 95827

The Honorable Deni Greene
Director, Office of Planning & Research
1400 - 10th Street
Sacramento, CA 95814

The Honorable Russell Schweickart
Chairman, Energy Resources Conservation & Development Commission
1111 Howe Avenue
Sacramento, CA 95825

The Honorable John Bryson, President
Public Utilities Commission
350 McAllister Street
San Francisco, CA 94102

The Honorable Carole Onorato
Chairwoman, California Transportation Commission
1120 - N Street
Sacramento, CA 95814

The Honorable William F. Northrop
Executive Officer
State Lands Commission
1807 - 13th Street
Sacramento, CA 95814

The Honorable Lenard Grote
Chairman, California Coastal Commission
631 Howard Street, 4th Floor
San Francisco, CA 94105

Director, Office of Appropriate Technology
1600 - 9th Street
Sacramento, CA 95814

State Architect
1500 - 5th Street
Sacramento, CA 95814

Chairman
Building Standards Commission
915 Capitol Mall, 2nd Floor
Sacramento, CA 95814

The Honorable Ruth L. Rushen
Director of Corrections
630 - K Street, Ste. 200
Sacramento, CA 95814

Memorandum

To : Byron S. Georgiou
Legal Affairs Secretary
Office of the Governor

Date: September 18, 1981

John J. Kearns
Deputy Director
From : **OFFICE OF EMERGENCY SERVICES**

Subject: Request to Identify and
Produce Emergency Planning and
Earthquake Data

Because the Office of Emergency Services is involved in emergency response planning for nuclear power plants, earthquakes and other disasters, the request for documents outlined in your August 26, 1981 memo is so broad it would include nearly every paper, document, film and tape in the possession of OES. Further, within a short time it is impossible to accurately determine the state resources and time frame required for providing all of these materials to you.

Our current annual estimate of cubic footage of Records Holdings totals 1,049. Using our best estimates, duplication of these documents would require 18 person-years and a cost of about \$450,000 in salary, \$60,000 overhead and \$130,000 for duplication, at a total of \$640,000.

The magnitude of this task is such that further guidance is needed from your office to decide how we are to begin and what resources are to be assigned. Given this clarification, we will provide the necessary information as expeditiously as possible.



JOHN J. KEARNS
Deputy Director

EXHIBIT D**Memorandum**

To : Bryon Georgiou
Legal Affairs Secretary
Governor's Office
State Capitol
Sacramento, CA

Date : SEP 17 1981

File No.:

Subject: Request to
Identify and
Produce Emergency
Planning and
Earthquake Delta

From : Department of Water Resources

Your memo of August 26, 1981, addressed to all State agencies, departments, boards, and commissions, requests that certain actions be taken to assist Governor Brown in responding to a document production request made by Pacific Gas and Electric Company (PGandE) in the Diablo Canyon proceeding before the United States Nuclear Regulatory Commission. The following information has been conveyed orally to Larry Lanfer, the Washington, D.C., attorney representing California in the Diablo Canyon proceeding.

DWR has been involved since 1977 as an intervenor in Pacific Gas and Electric Company (Stanislaus Nuclear Project, Unit No. 1) U.S. Nuclear Regulatory Commission Docket No. P0504A. At issue in this proceeding, brought before the Atomic Safety and Licensing Board, is whether granting a permit and license to PGandE for the proposed Stanislaus Nuclear Project will create or maintain a situation inconsistent with the antitrust laws.

The Stanislaus litigation has involved and continues to involve lengthy discovery proceedings and massive document production efforts by PGandE and DWR. In the course of the Stanislaus discovery proceedings, DWR has furnished to PGandE the DWR File Manual (an index listing the title of all files in DWR's central records). The File Manual is contained in a large three-ring binder and consists of at least 300 single-spaced pages. By using this index and inspecting the DWR file stations (accompanied by a DWR attorney), PGandE has been able to designate which of DWR's files it was interested in examining. Pursuant to PGandE's document production request in the Stanislaus proceeding, DWR has already turned over to PGandE approximately 48,300 pages of documents with an additional 25,300 pages waiting to be turned over. Ultimately, DWR estimates that PGandE will receive more than 210,000 pages of DWR documents.

Bryon Georgiou

Page 2

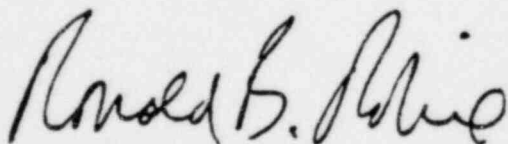
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We feel that, because of its knowledge of DWR's filing system obtained in the course of the Stanislaus litigation and its possession of DWR's central records filing index, PGandE should be able to specify with precision those DWR files which it wants produced in the Diablo Canyon proceeding. Because of the detailed records which DWR keeps of all of its transactions, access to the materials in DWR's central records should provide PGandE with a very substantial amount of material on emergency preparedness. These materials should be screened for privilege before being turned over to PGandE.

With regard to the documents other than those in DWR's central records, there is no easy way of estimating the time, personnel, and costs associated with retrieval, duplication, and production. This residual body of documents would include all the papers in each staff member's office. There is no basis for estimating the volume of these papers. For example, the sole function of the DWR Division of Safety of Dams is to supervise the design, construction, maintenance, repair, alteration and operation of all dams and reservoirs in the State above a certain minimum size and capacity, for the safety of life and property. Literal compliance with PGandE's document production request would require copying and screening for privilege virtually every piece of paper within that entire division.

The same dilemma is largely true of DWR's Division of Operation and Maintenance. A substantial task of that division is to ensure the continued safe functioning of the State Water Project. Therefore arguably a great deal of paper in that division would be producible under the PGandE request for documents relating to emergency planning. The same is true of the Division of Flood Management and other units within DWR. This could result in enormous expenditures and could consume large amounts of time.

We hope that this information will be of help to you in responding to the PGandE document production request. If you require any additional information please contact Michael J. Strumwasser of the Attorney General's office, who is representing DWR in the Stanislaus proceeding (8-677-2102) or Susan Weber of the DWR legal staff (445-4857).



Ronald B. Robie
Director

cc: Michael J. Strumwasser
3580 Wilshire Blvd.
Los Angeles, CA 90010

Memorandum

EXHIBIT E

To : Byron S. Georgiou
Legal Affairs Secretary to
the Governor
Governor's Office
State Capitol
Sacramento, CA 95814

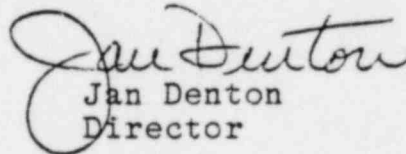
Date : September 11, 1981

Subject: Pacific Gas and Electric
Request for Documents Relating
to the Earthquake Emergency
Response Considerations at
Diablo Canyon

From : Department of Conservation—Office of the Director

We have not considered any earthquake emergency response activities as part of our correspondence.

I therefore believe that none of the materials within our files relate to the documents requested as characterized on page 2 of your August 26 memorandum.


Jan Denton
Director

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MemorandumEXHIBIT F

To : Byron S. Georgiou
Legal Affairs Secretary
to the Governor

Date : September 16, 1981

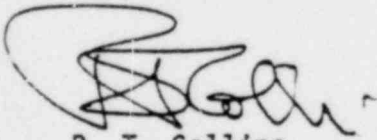
File No.:

Subject: Request to Identify and
Produce Emergency Planning
and Earthquake Data

From : California Conservation Corps

I agree with the Governor--PG&E's request to provide every note, memo and revision of the California Conservation Corps' emergency response documents is unreasonable.

1. Attached are the CCC's major emergency planning documents and an example of a recent earthquake memorandum.
2. Initial conversations with headquarters and field staff have been conducted to get an idea of the extent of the planning required for the retrieval of the necessary documents. A complete search of the files pertaining to earthquakes or emergency planning will require the following planning, personnel and costs.
 - A. 1. Initially, an Associate Environmental Planner would develop the guidelines of what materials need to be gathered. Identification of the various individuals having contact with emergency planning documents would be conducted.
 2. Directives and guidelines would then be sent to the appropriate headquarters and field staff.
 3. All individuals identified to collect emergency planning documents would gather the material and route the documents to the Planning Branch.
 4. Compilation of all field and headquarters documents would take place in the Planning Branch.
 5. Copies of all materials gathered would be made.
- B. The number of people involved in a search of all files and documents related to emergencies would be around 100 staff.
- C. Approximately three weeks would be required to complete the entire search process. If started today the final document could be in your hands by October 1, 1981.
- D. An estimate of the copying costs for headquarters and field centers is \$955. An estimate of the labor and administrative costs for the search are \$12,219. Total costs are estimated to be \$13,174.



B. T. Collins
Director

attachments

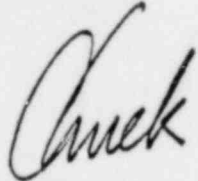
Memorandum

EXHIBIT G

To : Byron Georgiou

Date: September 15, 1981

From : Charles Brandes
Governor's Office
Office of Planning and Research



Subject: Response to Request for Radiological Emergency Planning Data

Attached are copies of documents prepared by OPR staff which may be relevant to PG&E's request for information on nuclear power plant emergency planning. Attachment A is a 1980 legislative proposal which would have required low density development around nuclear power plants. Although approved by the Governor's Office the legislation was put on hold while NRC developed their low population zones.

However, the philosophy of appropriately zoning areas near nuclear facilities persists in OPR's second set of attachments, lettered B through E. These memos are concerned with the 1981 Office of Emergency Services (OES) Nuclear Power Plant Emergency Response Plan. As you can see from these memos, we consistently raised a set of issues with OES on the safety of nuclear plants that have yet to be resolved. Our primary concerns center on impacts to human health from malfunctioning power plants or reactor accidents.

We also concur with the Energy Commission, (see attachment B), in questioning the wisdom of designating local government as responsible for determining if and when to evacuate an area. However, since this authority has been placed with local officials, we feel it is necessary to expand and clarify factual information in the Plan. Since knowledge about hazards to health is basic to making sound decisions regarding emergency procedures, we considered the Radiation and Hazards Section particularly important.

In addition to the attached papers, OPR staff met with OES on one occasion, and with Phil Greenberg on another. Notes from these meetings are not readily available. The meeting with OES (May 1981) was mainly a discussion of philosophical differences regarding the Plan. A subsequent meeting with Phil Greenberg (July 1981) was convened to attempt resolution of these differences. Attachment E, a memo to Phil Greenberg and Peter Gleick, contains suggested language changes to the Plan which were requested by the Governor's Office.

Handwritten notes taken at these meeting and some background material on the legislative proposal (Attachment A) do exist. Retrieval would take cooperation of 4 or 5 OPR staff and at least 8 hours.

Memorandum

EXHIBIT H

To : Byron S. Georgiou
Legal Affairs Secretary to the Governor
Governor's Office
State Capitol, First Floor
Sacramento, California 95814

Date : SEP 15 1981

Subject: Response to Request to
Identify and Produce
Emergency Planning and
Earthquake Data

From : Department of Boating and Waterways

The Department of Boating and Waterways possesses no documents of any type relating to radiological emergency planning, earthquake response or emergency planning for Diablo Canyon Nuclear Power Plant or any other facilities, nor does this Department possess any documents relating to State, local, Federal, or utility emergency response plans within the State of California.


MARTY MERCADO
Director

Memorandum

EXHIBIT I

To : Mr. Byron S. Georgiou
Legal Affairs Secretary
to the Governor
State Capitol
Sacramento, CA 95814

Date : September 15, 1981

Place : Sacramento

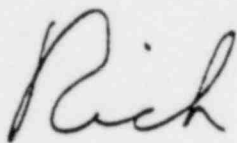
Phone: 5-7126

From : Department of Food and Agriculture

Subject: Request to Identify and Produce
Emergency Planning and Earthquake Data

At this time the Department of Food and Agriculture has no documents as requested in your memo of August 26.

We have contracted with Envirosphere to formulate a nuclear response plan for the Department; work on that plan has not yet begun. Envirosphere is developing response plans for other state agencies and ours will be coordinated with them.



Richard E. Rominger
Director

Memorandum

EXHIBIT J

To : Byron Georgiou
Legal Affairs Secretary to the Governor
Governor's Office

Date : September 14, 1981

From : Office of the Director
California Department of Aging

Subject: Request to Identify and Produce Emergency Planning and Earthquake Data

In response to your request of August 26, 1981:

- a. We will be forwarding copies of the following information identified in your request:
 1. The Department's internal emergency preparedness plan.
 2. The most recent draft of the Department's requirements for emergency planning by its sub-grantees.
 3. The Department's directive to its sub-grantees requiring emergency planning resource data.
 4. Responses from sub-grantees to Item 3 above.
 5. Data sheets reflecting first-phase cataloguing of sub-grantee resources.
 6. Summary sheets by geographic area of sub-grantee resources.
 7. All inter- and intra-departmental correspondence and reports involving emergency planning.
 8. Drafts of site-location maps by sub-grantee geographic jurisdiction.
- b. All emergency planning activity rests with the single staff person designated as Emergency Preparedness Coordinator (EPC). All documentation rests with the EPC, who maintains single-point files.

One person (the EPC) will be required for the search, which will be completed by approximately September 21, 1981.

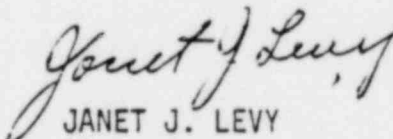
- c. The documents will not be available until Friday, October 9, 1981, because of scheduling priorities for duplicating services.

d. Document copying will cost \$432.20, distributed as follows:

- | | |
|---|-------------|
| 1) 4000 pages @ .005 per xerox impression = | \$ 20.00 |
| 2) 4000 pages @ \$2.50 per 500 sheet ream = | \$ 20.00 |
| 3) Staff time (hours) = | \$392.20 |
| a) 24 hours - Office Assistant II (T) = | \$261.36 |
| Salary, benefits, etc. = | \$10.89/hr. |
| b) 4 hours - Staff Services Manager II = | \$130.84 |
| Salary, benefits, etc. = | \$32.71/hr. |

TOTAL ESTIMATED COSTS

\$432.20


JANET J. LEVY
Director

Memorandum

EXHIBIT K

To : Byron S. Georgiou
Legal Affairs Secretary
to the Governor
Governor's Office
State Capitol

Date : September 16, 1981

Subject: Request to Identify
and Produce Emergency
Planning and Earthquake
Data

Telephone: ATSS (8) 473-3131
(916) 323-3131

From : Office of The Director

This is in response to your memorandum of August 26, 1981, to all State Agencies, Departments, Boards and Commissions, requesting identification and production of emergency planning and earthquake data for Pacific Gas and Electric Company (PG&E).

In order to begin a search for the requested documents, the Department must first contact, by telephone, each of the nine state hospitals to determine what materials they have which are readily available. The next step would be to follow up the telephone request with a memorandum to each State hospital giving more specific details as to what PG&E defines as "documents" which relate in any way to radiological emergency planning or earthquake response or emergency planning, and/or "documents" which relate in any way to State, local, Federal, or utility emergency response plans within the State of California. The Department of Developmental Services, Health and Safety Unit, has begun the process by collecting copies of Emergency Preparedness Plans for each of the nine State hospitals from the headquarters Health and Safety Unit files. All materials that are readily available at this time are enclosed. As some hospitals are currently working on revision of their Emergency Preparedness Plans, it is hoped that they can be finalized within the next two months.

The approximate number of personnel required to accomplish the data search is 21. The personnel assigned to the data search is as follows:

- 1 - Staff Services Manager II
- 1 - Management Services Technician (B)
- 9 - Hospital Health and Safety Coordinators
- 10 - Office Assistants II (Typing)

21

The estimated time by which a search can be completed and all documents provided is two (2) months (10 hours per week for 8 weeks x 21 staff = 1680 total man hours). The estimated costs of copying all documents (3,500 pages x 1.3¢ per page) is \$45.50.

The following estimate of salaries and administrative costs is based on each staff member participating in the search for 40 hours per month:

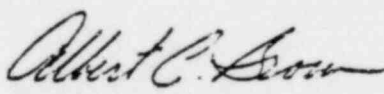
<u>Personnel</u>	<u>Hourly Salary*</u>		<u>Hrs Per Month</u>		<u>Total Salary</u>		<u>Staff Benefits</u>		<u>Admin Support</u>		<u>Total</u>
Staff Svs Mgr II	\$ 17.42	x	40	=	\$696.80	+	\$201.48	+	\$166.23	=	\$ 1,064.51
Mgmt Svs Tech (B)	8.52	x	40	=	340.80	+	98.44		22.64	=	461.88
Hosp Health & Safety Coordinator	13.61	x	40	=	544.40	+	157.32	+	36.18	=	6,641.10
Office Asst II (T)	6.37	x	40	=	254.80	+	73.83	+	16.98	=	<u>3,456.10</u>

*Based on 173.33 hour months as provided in State Personnel Board Rule 93.

\$11,623.59

In the event that it would take two full months to accomplish the search for data, the total estimated cost for copying, salaries and administrative support would be \$23,292.68.

All subsequent "documents" relating to emergency planning and earthquake data will be forwarded to your office at the earliest possible date. Should you have any questions concerning this matter, please contact Douglas G. Arnold, Deputy Director, Administration Division, 1600 Ninth Street, Third Floor Southeast, Sacramento, phone 445-6168.


David E. Loberg, Ph.D.
Director

Enclosures

cc: Albert C. Brown
Chief Deputy Director

Douglas G. Arnold
Deputy Director
Administration Division

Bamford Frankland
Deputy Director
Hospital Operations Division

James K. Kahue, Chief
Personnel Management Branch

Jose Romero, Chief
Manpower, Training, Safety Section

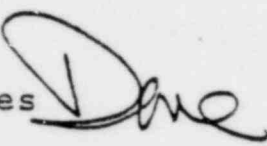
Memorandum

EXHIBIT L

To : Beverlee A. Myers
Director
8/1253

Date : September 16, 1981

Subject: Request from Governor's
Office to Produce Emergency
Planning and Earthquake Data

From : Richard H. Koppes 
Chief Counsel
Office of Legal Services
8/1216 2-2784

Attached is a memorandum from Byron S. Georgiou, Legal Affairs Secretary to the Governor. He has stated in this memo that Pacific Gas & Electric (PG&E) has requested Governor Brown to produce certain relevant documents prior to the proceeding before the United States Nuclear Regulatory Commission to determine whether a full operating license should be granted for operation of the Diablo Canyon Nuclear Power Plant. To enable the Governor's Office to respond to PG&E's request, Mr. Georgiou requests that we provide him with all readily available documents that fall within PG&E's request. As to those documents that are not readily available, he has requested that the Department provide by September 16, 1981, both a description of the search that will have to be undertaken to produce such documents and a description of the time, commitment of staff and the costs associated with responding to this request.

You have asked the Office of Legal Services to coordinate the Department's response to this request. The fact that the memo was received by you on September 10th and by this office at the close of business on September 11, 1981, has made it difficult to coordinate a full response to Mr. Georgiou's request. In an attempt to respond fully, we have conducted a search of this office's files and have discussed the request with Ellen Powell of the Office of Legislative Liason, Dr. William Nesbitt of the Disaster Medical Services Section and Joe Ward of the Radiologic Health Section.

Ellen Powell provided us with the attached copies of the files on SB 1183, SB 1184 and SB 1185, which were adopted in 1979, mandating the development of emergency plans for the San Onofre, Rancho Seco, and Diablo Canyon Nuclear Power Plants. Ellen stated that these files contained all of her office's files covered by the PG&E request.

September 16, 1981

Bob Kunstel from the Disaster Medical Services Section has provided all of that section's readily available documents encompassed within the request. He has stated that a response to the request as to all other documents would necessitate a search of four file cabinets and two bookcases. He stated that such a search would require as long as a person month. He further indicated that with a staff of four people, such a commitment of staff time would be difficult.

Ken Fess from the Radiologic Health Section has provided us with the attached memo (Attachment 1) and documents. In that memo he has outlined the scope of the search that would be required for that section to respond to this request.

The search in our office revealed no documents that would be covered by the request. Marian King of my staff discussed with Wade Rose of the Governor's Office the unreasonableness of PG&E's definition of "documents." Mr. Rose stated that the Governor's Office is only interested in receiving "standardized documents." They are not interested in receiving calendars, appointment books, diaries and the like.

Please let me know if I can be of any further assistance in this matter.

RHK:MAK:pfb
Attachment

cc: Ellen Powell
OLL

Joe Ward
Radiologic Health Section

Dr. William Nesbitt
Disaster Medical Services Section

Memorandum

To : Marian King
Office of Legal Services
OB8/1216

Date : September 16, 1981

Subject: Request for Emergency
Planning and Earthquake Data
Documentation.

From : Radiologic Health Section
520 Capitol Mall, Room 800
3-2772

The following information relative to your request is provided herein:

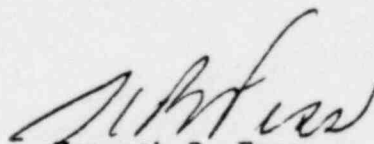
1. The first draft of the Radiologic Health Section Emergency Operating Procedures, produced by EnviroSphere, and comments thereof, are being copied and should be available by Wednesday noon. Other appropriate letters and documents immediately available are enclosed herewith.
2. We estimate there is approximately 13 cubic feet of filed material which needs to be sorted, reviewed, and copies made. The main areas include, but are not limited to:
 - a) comments and working papers on the Nuclear Power Plant study done by Science Applications Inc.,
 - b) ingestion planning zone development procedures and guidance papers,
 - c) remote radiation detector systems notes, correspondence and directives (1979 - SB1184),
 - d) RHS - EnviroSphere correspondence regarding work on contract on operating procedures,
 - e) RHS comments to the OES on Utility, State and County planning documents,
 - f) comments and notes on conduct of Emergency exercises and drills (San Onofre and Diablo Canyon).

We estimate the review will take a minimum of ten (10) dedicated person-days and, if 20% of material is germane, the cost for copying such material should approximate \$550.00, and with high priority take two (2) days.

Since additional staff has not been provided for this effort, it will be necessary to divert two or more persons from current projects. The immediate result will be:

- a) we will be unable to participate in the interagency support review meeting with the U.S. Department of Energy on September 22nd for needed federal technical support of emergency actions,
- b) we will forgo reviewing preliminary drafts of the four-county emergency plans for a Rancho Seco accident, and be unprepared for discussions on this matter on September 23rd,

- c) we will delay needed calibrations of our emergency kit instruments,
 - d) the formulation of transportation studies on nuclear packaging, storage and surveillance will be postponed again,
 - e) if the work extends into October, our replacement of dosimeters around nuclear power plants will be later than specified by our contract with NRC.
3. We have verified with OES that they will respond to subject request by providing copies of State, County, Utility emergency response plans and correspondence with the Federal Emergency Management Agency (FEMA) regarding recent nuclear power plant drills and exercises. The Office of Emergency Services (OES) has also emergency planning documents involving the U.S. Navy and local municipalities such as San Diego and the four county region about Mare Island Naval Shipyard.
 4. Verifying our agreement we will not furnish the Pacific Gas and Electric Company (PG&E) originated documents such as Final Safety Reports, Emergency plans, Hosgri Seismic Evaluations, etc. These reports occupy about eleven (11) feet of shelf space.
 5. We also have on file safety and emergency planning reports from the Southern California Edison Company - San Onofre Nuclear Generating Station (SONGS) and from the Sacramento Municipal Utility District - Rancho Seco Nuclear Generating Station (RSNGS). This material is similar in scope with that of PG&E identified in paragraph 4 above. The amount of shelf space involved is thirteen (13) feet and seven (7) feet respectively. We suggest that should these documents are needed, they may be obtained from the Utility's document room or the U.S. Nuclear Regulatory Commission (USNRC), and not by local reproduction. If desired we will identify the appropriate volumes.
 6. There are many Federal reports, directives, and guides concerning emergency planning, the Three Mile Island (TMI) consequences, system and component upgrading, and the Diablo Canyon Environmental statements all available as public documents. The Federal Emergency Management Agency (FEMA) has published documents on emergency planning and monitoring which are also in the public domain. I believe, we agreed we do not need to provide these items.



Kenneth B. Fess
Senior Health Physicist

Enclosures

Memorandum

EXHIBIT M

To : Byron S. Georgiou
Legal Affairs Secretary to the Governor

Date : September 16, 1981

File No. : 1.3909.A5002

Subject : REQUEST TO IDENTIFY
AND PRODUCE EMERGENCY
PLANNING AND EARTHQUAKE
DATA

From : Department of California Highway Patrol
Office of the Commissioner

The packages that are accompanying this memorandum represent all readily available documents falling within the purview of the Pacific Gas and Electric Company's request. They have been obtained from each of our area offices throughout the state, each headquarter's unit and each subdivision of our organization that is in any way involved with this type of planning.

The total number of pages provided is 12,648, which have been reproduced at a cost of \$157.50. The administrative cost to obtain these documents is estimated to be \$11,329.24.

In order to provide copies of the remaining documents as identified in your memorandum, we estimate that it would require 2,432 hours of staff time, including administrative and supervisory time, for a cost of \$49,304.84. The estimated cost of reproducing the additional 164,904 documents requested would be approximately \$2,061.25.

Please be advised that every document that has been provided thus far contains material that is protected from release by one or more state and/or federal statutes. In accordance with the direction received from Mr. Phillip Greenberg, no attempt has been made to specifically identify the protected pages.

G. B. CRAIG
Commissioner

Attachments

Memorandum

EXHIBIT N

To : Byron S. Georgiou
Legal Affairs Secretary to the Governor

Date : September 17, 1981

From : Department of Fish and Game

Subject: Request to Identify and Produce Documents on Emergency Planning
and Earthquake Response Plans

The information requested in your memorandum of August 26, 1981, is provided below. Because of the unusually broad nature of PG&E's request, the personnel requirements and costs listed below are best estimates, and are subject to refinement as our search for the requested documents proceeds.

- (a) A description of the steps that your agency is taking and will need to take in order to search for the requested documents.

The Department will have to utilize temporary help, as well as a large number of permanent employees to search our files, libraries, and the personal papers of employees in each office throughout the State. A coordinator will be assigned the task of overseeing the statewide effort and assuring the timely completion of the document search and reproduction.

- (b) The number of personnel in your agency required to accomplish the foregoing search.

Over 400 Department employees will be involved in some manner during the acquisition and reproduction of the requested documents.

- (c) The estimated time by which such search can be accomplished and all documents provided to me.

It will take about six months to accomplish the search, reproduce the documents, and provide them to you.

- (d) An estimate of the direct costs of copying all such documents and an estimate of the salaries and administrative costs associated with the performance of these tasks by the persons assigned to perform them.

Direct Copying Costs	\$ 7,500
Personnel & Administrative Costs	125,000
Total Costs	\$132,500

Please contact us if you have any questions regarding these estimates.

E. V. Taffoli

FOR Director

HAND DELIVERED**M e m o r a n d u m**EXHIBIT O

To : Honorable Byron S. Georgiou
Legal Affairs Secretary to the Governor
Governor's Office
State Capitol
Sacramento, CA 95814

Date : September 16, 1981

A 1

Telephone: ATSS ()
(445) 3976

From : Department of Forestry

Subject: 7100 COOPERATIVE FIRE PROTECTION
7110 Local Government Protection Program
Diablo Canyon Nuclear Power Plant (PG&E)


Delivered with this memorandum are all of the documents within the scope of PG&E's request to identify and produce emergency planning and earthquake data in connection with the full power operating license proceedings on the Diablo Canyon Nuclear Power Plant before the NRC.

Attached to this memorandum is a report from this department's Region V office in Monterey, which includes the San Luis Obispo Ranger Unit where the power plant is situated.

In addition to the document search and copying described in the Region V memorandum, we searched the only two files existing in Sacramento Headquarters, my personal file and the file of the Deputy Director for Fire Protection and Technical Services. The documents delivered with this memorandum include copies of all documents from those two files which were not duplicated in the papers transmitted from Region V.

I believe that we have made a diligent search both here in Headquarters and in the field and that this department possesses no other documents within the scope of PG&E's discovery request.

Finally, attached is a statement respecting costs incurred in complying with this request at the Headquarters level, which supplements the statement of costs contained in the attached Region V memorandum of September 11th.


DAVID E. PESONEN
Director

js

Attachments

Memorandum

To : David E. Pesonen, Director

Date : September 11, 1981

5AA

From : Department of Forestry - Region V

SEP 14 1981

Subject: 7100 COOPERATIVE FIRE PROTECTION
7110 Local Government Protection Program .
Diablo Canyon Nuclear Power Plant (PG&E)

Reference is made to your memorandum of September 4, 1981, requesting that we provide copies of all documents related to emergency response planning as described in Legal Affairs Secretary to the Governor Byron S. Georgiou's memo dated August 26 to all state agencies, departments, boards and commissions.

By special courier, we are delivering all of the available documents related to emergency response planning which fall within PG&E's request in order to meet your deadline of September 14, 1981.

With reference to Item 2 at the bottom of page 2 in Secretary Georgiou's memo, the following is intended to answer the specific questions asked.

- (a) The Region directed the ranger units to make a search of their files and provide photocopies of all documents related to emergency planning described in Items 1 and 2 on page 1 of Secretary Georgiou's memo of August 26. A copy of that memo was provided to each ranger unit in order that they would have the benefit of the total request, including the definition of "documents." Their photocopies were requested to be delivered to the Region Office by 1000 hours on September 11, in order that they could be combined and forwarded with the Region Office documents to meet the September 14 deadline for delivery to the Director's office. Concurrently with the ranger units' efforts, the Region headquarters files were also searched for emergency response planning documents. Only those that did not duplicate the documents supplied by the ranger units were photocopied to avoid duplication. All documents were then combined in a single package for delivery to the Director.

September 11, 1981

(b, c & d) The following table provides the answers for items b, c and d as it relates to the number of Region V personnel, estimated time required for the project and the estimated costs for salaries to do the job.

In addition to the above, the estimated direct cost for photocopy paper is: 3 reams @ \$2.65 = \$7.95

<u>No.</u>	<u>Classification</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total Cost</u>
1	State For. Rgr. III	4	\$18.76	\$ 75.04
4	State For. Rgr. II	8	17.00	136.00
1	State For. Rgr. I	2	15.45	30.90
1	Fire Prev. Ofcr. I	1	15.45	15.45
1	Secretary	1	7.92	7.92
4	Stenographer, Range B	36	6.98	251.28
1	Office Asst. II	1	6.86	6.86
<u>1</u>	<u>Dispatcher/Clerk</u>	<u>2</u>	<u>7.75</u>	<u>15.50</u>
14		55		\$538.95

JOHN H. HASTINGS
Chief

By 
Richard H. Bawcom
Assistant Chief

cjr

cc: w/documents

IDENTIFICATION AND PRODUCTION OF EMERGENCY PLANNING AND EARTHQUAKE DATA
IN RESPONSE TO REQUEST OF BYRON S. GEORGIU, AUGUST 26, 1981

Estimate of the time to search and duplicate files of

David E. Pesonen, Director, Department of Forestry:

<u>No.</u>	<u>Classification</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total Cost</u>
1	Administrative Assistant I	2	\$10.79	\$ 21.58
1	Office Asst. II, Typing	3	6.37	19.11
<u>2</u>		<u>5</u>		<u>40.69</u>

In addition to the above, the estimated direct cost for photocopy paper is:
1-1/2 reams @ \$4.50 = \$6.75

Region V Headquarters and Ranger Unit Offices, Department of Forestry:

1	State Forest Ranger III	1	\$18.76	\$ 75.04
4	State Forest Ranger II	8	17.00	136.00
1	State Forest Ranger I	2	15.45	30.90
1	Fire Prevention Officer I	1	15.45	15.45
1	Secretary	1	7.92	7.92
4	Stenographer, Range B	36	6.98	251.28
1	Office Assistant II	1	6.86	6.86
1	Dispatcher/Clerk	2	7.75	15.50
<u>14</u>		<u>55</u>		<u>\$ 538.95</u>

In addition to the above, the estimated direct cost for photocopy paper is:
3 reams @ \$2.65 = \$7.95

Memorandum

EXHIBIT P

To : Mr. Bryon S. Georgiou
Legal Affairs Secretary to the Governor
State Capitol, First Floor
Sacramento, CA 95814

Date : September 18, 1981

Subject: Your request to identify
and produce emergency
planning and earthquake
data (August 26, 1981)

via Mario G. Obledo, Secretary
Health and Welfare Agency

From : Department of Social Services

In reference to the above requested material the only such material presently in our files and which is related directly to the responsibilities of this Department, is a copy of the San Luis Obispo County Social Services Department's Standard Operating Procedures for Nuclear Power Plant Emergency Response, dated March 1977, and a copy of the San Luis Obispo County Social Services Department Standard Operating Procedures (Emergency Welfare Services Annex to the county's emergency response plan).

All other material relative to your inquiry, is maintained by the Office of Emergency Services, and is held by that agency.

The State Department of Social Services is presently working on an emergency response plan which is still under administrative review, and not in final form. Such, however, will be forwarded at your request.

Marion J. Woods

MARION J. WOODS
Director

Enclosures



EMERGENCY MEDICAL SERVICES AUTHORITY
STATE OF CALIFORNIA

ROGER S. TAYLOR, MD, MPA - DIRECTOR

EDMUND G. BROWN JR., GOVERNOR
MARIO G. OBLEDO, SECRETARY
HEALTH AND WELFARE AGENCY

TO: Byron S. Georgiou
Legal Affairs Secretary to the Governor

Date: September 15, 1981

VIA: Roger Taylor, M.D. *RT/pt RT 177*
Emergency Medical Services Authority

FROM: Calvin Freeman
Disaster Medical Services Section *CF*

SUBJECT: Production of Emergency Planning & Earthquake Data

This memorandum is in response to your request for procedure and cost information concerning the provision of emergency planning and earthquake data. Enclosed please find material which is readily available. We have checked with the Radiological Health Section of the Department of Health Services and they will provide you with a copy of the DHS Response Plan for Nuclear Power Plant Emergencies.

The Disaster Medical Services Section possesses an enormous amount of material, provision of which would create a prohibitive workload for the four staff of the Section. Specifically, the information requested is contained in sixteen file drawers and on fifteen bookcase shelves. Our conservative estimate is that collecting, sorting, and refiling all the information requested would require about one person-month to complete. Duplication costs would be in the neighborhood of \$50,000.

The Section's files are open, however, and staff would be available to assist anyone with authorization to locate relevant information.

If you have any questions or require additional information please contact me at 2-2300.

CF/sl

cc: Kathleer Acree, M.D.
William R. Nesbitt, M.D.

Enc.

Memorandum

EXHIBIT R

Date : SEP 17 1981

To : Byron S. Georgiou
Legal Affairs Secretary to the Governor
Governor's Office
State Capitol
Sacramento, CA

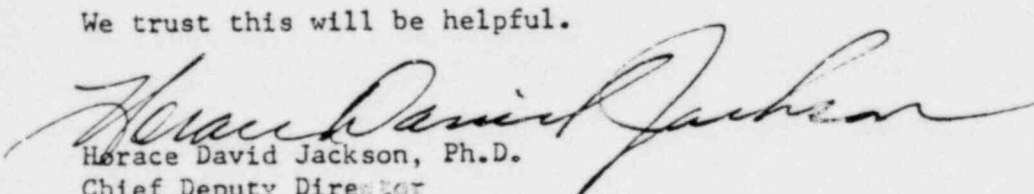
From : Department of Parks and Recreation

Subject: Request to Identify and Produce
Emergency Planning and Earthquake Data
Memorandum dated August 26, 1981

As per your request to search for, identify and produce in Sacramento all documents, charts, studies, photographs, plans, etc., that address preparedness to take emergency actions where an earthquake complicates emergency response, we offer the following.

We will notify all park Regional Offices and park Area Offices to search for and provide the requested documents. As many as one hundred personnel will spend some work time searching, identifying and transporting documents to Sacramento. Totally this will amount to 20 person/days and the work should be completed within seven working days. Our estimate of park emergency plans may equal five cubic feet and other photographs, letters, memorandums, studies, etc., may equal one to two cubic feet. Cost \$2,500.00.

We trust this will be helpful.


Horace David Jackson, Ph.D.
Chief Deputy Director

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PACIFIC GAS AND ELECTRIC COMPANY)	Docket Nos. 50-275 O.L.
)	50-323 O.L.
(Diablo Canyon Nuclear Power Plant,)	
Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "RESPONSE OF GOVERNOR EDMUND G. BROWN JR. TO PACIFIC GAS AND ELECTRIC COMPANY DOCUMENT PRODUCTION REQUEST DATED AUGUST 18, 1981" in the above-mentioned proceeding have been served to the following on September 22, 1981 by U.S. mail, first class.

Mr. Thomas Moore, Chairman
Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. W. Reed Johnson
Atomic Safety and Licensing Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. John H. Buck
Atomic Safety and Licensing Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

John F. Wolf, Esq., Chairman
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

William J. Olmstead, Esq.
Edward G. Ketchen, Esq.
Lucinda Low Swartz, Esq.
Office of Executive Legal Director
BETH 042
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
ATTENTION: Docketing and Service Section

Mrs. Elizabeth Apfelberg
1415 Cozadero
San Luis Obispo, CA 93401

Janice E. Kerr, Esq.
Public Utilities Commission
5246 State Building
350 McAllister Street
San Francisco, CA 94102

Mrs. Raye Fleming
1920 Mattie Road
Shell Beach, CA 93449

Mr. Frederick Eissler
Scenic Shoreline Preservation Conference, Inc.
4623 More Mesa Drive
Santa Barbara, CA 93105

Mr. Gordon Silver
Mrs. Sandra A. Silver
1760 Alisal Street
San Luis Obispo, CA 93401

John Phillips, Esq.
Center for Law in the Public Interest
10203 Santa Monica Drive
Los Angeles, CA 90067

Bruce Norton, Esq.
Norton, Burke, Berry & Junck
3216 North Third Street - Suite 300
Phoenix, Arizona 85012

Philip A. Crane, Jr., Esq.
Richard F. Locke, Esq.
F. Ronald Laupheimer, Esq.
Pacific Gas and Electric Company
1050 17th Street, N.W.
Suite 1180
Washington, D. C. 20036


David S. Fleischaker, Esq.
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