

DOCKETED
USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
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Dear Sirs:

After attending a recent meeting of the San Diego County Board of Supervisors on September 29th addressing the issue of a 20 mile evacuation radius around the San Onofre Nuclear Facility, we became very weary of the O.D.P.'s emergency response plan for a nuclear disaster at the facility.

It has recently been brought to our attention that indeed Southern California Edison is in violation of several N.R.C. requirements.

Supervisor Paul Eckert, Chairman of the Board of Supervisors and of the O.D.P., twice during the aforementioned meeting eluded to the fact that the present 10 mile evacuation plan is incomplete. We should also like to refer you to the enclosed correspondence, from Mr. Eckert to Carol Jahnkow.

It is our understanding, after reading the N.R.C. requirements for a licensee, that before the licensing of any nuclear power plant a "Final Safety Analysis Report" must be submitted. "The plans submitted must include a description of elements set out in section IV for the emergency planning zones, to an extent sufficient to demonstrate that plans provide reasonable assurance that adequate protective measures can and will be taken in the event of an emergency."

We submit to you that an incomplete plan as Mr. Eckert referred to is also inadequate, and therefore unit 1 is, and units II and III will be in direct violation of N.R.C. code should they be licensed.

Another apparent violation to the N.R.C. code was revealed during the course of James Hunts testimony, in response to questioning by Supervisor Hedgecock. (Hunt is the head of the Office for Disaster Preparedness). Hunt stated that it would be approximately one hour before a team could be assembled and decisions on action, such as public notification, could be taken. This is also stated in Nuclear power plant emergency response plan on page VIII-2 (Dec. 1980).

The N.R.C. code states, "By July 1, 1981, . . . The design objective shall be to have the capability to essentially complete the initial notification to the public within the Plume exposure pathway EPZ within about 15 minutes." Obviously by its own submission the O.D.P.'s plan does not live up to this standard.

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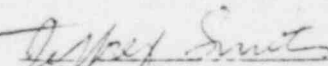
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We call on you to carry out your civic duty to enforce the law by revoking the license of San Onofre unit I and to deny licensing to units II and III.

For further information about the inadequacies of the O.D.P. plan please feel free to contact us.

Sincerely,


Robert Holzman


Jeffrey Smith

Enclosure

C.L. Calif. State Assembly men, U.S. Senators & Reps
Calif. Governor Brown