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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of	)	
	)	Docket Nos. 50-361 OL
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.	)	50-362 OL
	)	
(San Onofre Nuclear Generating Station, Units 2 and 3)	)	

APPLICANTS' RESPONSE IN OPPOSITION TO INTERVENORS GUARD, ET AL.'s APPLICATION FOR A STAY OF FULL POWER LICENSE

Dated: June 16, 1982.

D503

I. INTRODUCTION

On May 14, 1982 the Atomic Safety and Licensing Board ("ASLB") issued its Initial Decision ("ID") deciding the emergency planning issues in the above docket. The ID authorized the Director of Nuclear Reactor Regulation to issue a full-power license for San Onofre Nuclear Generating Station ("SONGS"), Unit Nos. 2 and 3 subject to certain conditions discussed below.1/

On June 1, 1982 Intervenors Guard, et al. ("Intervenors") served their Notice of Appeal of the ID and Application For Stay of Full Power License ("Application"). Pursuant to 10 C.F.R. 2.788(d), Applicants hereby respond in opposition to the Application.

A review of the ID compels a conclusion that the ASLB carefully considered the adequacy of the onsite and offsite plans to adequately protect the public health and safety and the capability of Applicants and offsite response organizations to implement their plans. The Application should be denied because Intervenors have failed to establish any of the requirements of 10 C.F.R. § 2.788(e) which must be satisfied if they are to prevail.

1/ In its Partial Initial Decision ("PID") dated January 11, 1982 the ASLB decided the seismic issues in the Applicants' favor, determined that the then-existing emergency planning was adequate for low-power operations, and authorized a low power license for SONGS, Unit 2.

II. THE INITIAL DECISION WAS CORRECTLY DECIDED; INTERVENORS WILL NOT PREVAIL ON THE MERITS.

Intervenors do no more than pay lip service to and totally fail to meet the requirement that in order to prevail on their Application they must make "a strong showing that they are likely to prevail on the merits." 10 C.F.R. § 2.788(e)(1).

A. The Initial Decision Correctly Employed Post-License Conditions to Fully Protect the Public Health and Safety.

The ASLB determined that deficiencies exist in two areas but found that the public health and safety would be protected if during the first six months of full power operation Applicants satisfied the license conditions imposed. These conditions require Applicants to install "a few" sirens in an area at the extreme outer edge of the Plume EPZ and to broaden existing medical planning to include members of the general public.2/

Intervenors position is straight forward. They assert that post-license conditions may never be employed. Not only do intervenors fail to cite any authority for this novel position, but they ignore the purpose and language of the regulations.

2/ The ASLB also instructed Applicants and the Staff to determine if emergency public information should be provided in Spanish. ID pp. 53-54; Finding of Fact ("FF") F 32. The ASLB did not find that a deficiency existed and specifically noted that time is not of the essence on this matter. ID p. 215. Intervenors have not challenged this determination.

The failure to satisfy a particular emergency planning requirement does not necessarily result in the denial of a license or the suspension of an existing license. 10 C.F.R. § 50.47(c)(1) provides that an applicant can demonstrate that (1) the deficiency is not significant for the plant in question, (2) adequate interim compensating actions have been or will be taken promptly or (3) there are other compelling reasons to permit plant operation.

In this proceeding Applicants demonstrated, and the ASLB found, that alternate means existed to alert the public in the area requiring additional sirens, thus satisfying the second criteria of § 50.47(c)(1). ID p. 19; FF A 21-25; FF G 11; see also, ASLB Order, May 25, 1982.

At the hearings, both the Applicants and the Staff took the position that specific medical planning for the general public was not required. While no specific showing was made of the medical services available to the public, Applicants' onsite plan was found to be well conceived and staffed with capacities exceeding those needed by persons injured at the site. In addition, the ASLB noted that Applicants "have provided some useful training seminars on the medical effects of radiation to offsite emergency response personnel" and that other medical service capacities in the area could be called upon on an ad hoc basis."

ID p. 45.3/ The ASLB's concern arose "from the risk of a serious accident over the facilities 30-year life" and it noted "that risks posed by operations in any given year or less are very remote -- significantly less than 10^{-6}, or one in one million." ID pp. 44-45. Considering all of these factors, the ASLB found that the deficiency with respect to medical services was not significant for SONGS so long as it was remedied in six months. ID p. 44.4/ Thus, this issue is governed by the first and second criteria of § 50.47(c)(1).

Intervenors have not made a strong showing that they are likely to prevail on the merits on these issues.

B. Adequate Methods, Systems and Equipment for Assessing and Monitoring Actual or Potential Offsite Consequences of a Radiological Emergency Condition Exist and Are In Use.

The ASLB found that Applicants were capable of performing all onsite and offsite radiation monitoring and

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3/ Intervenors' witness, Dr. Rex Ehling, Health Officer for the County of Orange, testified that facilities existed within and beyond the Plume EPZ to handle as many as 2,000 persons in the event of an emergency and that as many as 31,000 persons could be handled on a Southern California basis. Tr. 9992-9993.

4/ The ASLB also took into consideration the following factors: "Finally, the Applicants' and local officials' overall commendable attitude and good faith efforts to satisfy these new, and sometimes less than completely clear, emergency planning requirements should be taken into account. Those factors make us confident that the Applicants and local officials will make prompt efforts to develop adequate offsite medical arrangements and that they will be in place as soon as possible." ID pp. 45-46.

assessment required in the event of an emergency and that the planning standard of 10 C.F.R. § 50.47(b)(9) is satisfied. ID p. 49; FF D 12, 13, 25-26. To insure that this capability continued, and to enhance the capability, a license condition requires that Applicants' assessment and monitoring capacities be maintained at no less than the level described at the hearing and that the additional meteorological tower and health physics computer system being installed by Applicants be operational within six months after the commencement of full power operation.

Intervenors' expressed concern is that a radiation monitoring and assessment function must exist in the offsite jurisdictions as a backup to the Applicants' projection models. Application, pp. 3-4. Intervenors cannot possibly prevail on this issue since their concern has already been satisfied. The ASLB found that the offsite response organizations do have significant capabilities to monitor and assess possible radiation releases. FF D 16-19. The ASLB concluded, "that the offsite organizations do have significant capacities in trained personnel, equipment, and transportation and that those organizations could and would assist the Applicants in the event of an emergency." FF D 28.

C. The ASLB Thoroughly Considered The Adequacy Of The Emergency Plans.

Any reading of the ID (except, apparently, that of the Intervenors) establishes that in evaluating the evidence

the ASLB properly considered the requirements of 10 C.F.R. § 50.47(b), (c) and Part 50, Appendix E.IV. Indeed, had the ASLB simply adopted "a standard that what there is, is adequate" as Intervenors recklessly assert (Application, p. 5, ll. 27-28), the ID would have been a fraction of its 220 pages and would contain no conditions whatsoever.

Under 10 C.F.R. §§ 50.47(a)(1) and (b) (10) Applicants demonstrated, and the ASLB found, that a range of protective actions, including evacuation, sheltering and thyroid prophylaxis, are available and capable of being implemented. It was also found that the means for choosing between these actions under any particular circumstance had been established based upon consideration of the environmental, demographic and temporal factors, as well as resource availability, type of radioactive release, and exposure duration, with the goal of minimizing harmful effects.

Intervenors badly misconstrue the nature and requirements of the applicable regulations. Intervenors focus on time estimates for evacuation. These estimates are not to determine some measure of "adequacy" or specification for a particular dose savings, but, as recognized by the ASLB, are made "to provide decision makers knowledge of time required to allow evacuation under various conditions." FF B 18. The time estimates enable the decision makers to determine whether, under the circumstances then existing, evacuation or

sheltering, or some combination is the preferred action. See, FF B 9-12 and 63. Consideration of particular accidents is not the purpose of the regulations or the function of the ASLB. The emergency planning zone concept takes into account the broad range of radiological accidents and dose consequences to the public from such accidents. The ASLB properly evaluated the emergency plans and the capability of implementing such plans in this context.5/

D. The ASLB Properly Considered The Current State of Emergency Planning. Intervenors Were Not Denied Due Process.

Intervenors recognize that FEMA's Interim Findings establish a rebuttable presumption. Application, p. 7.

5/ The material attached to the Application concerning emergency drills conducted by one response organization should not be considered by the Appeal Board. No affidavit has been provided as required by 10 C.F.R. § 2.788(b)(4) and no basis has been provided to evaluate the drill discussed. For example, was it assumed that visitors to the beach ignored the posters and flyers provided by Applicants for use at the State parks and beaches (FF F 13) and that none had radios to tune to one of the pre-identified Emergency Broadcasting System stations carrying emergency messages? Was it assumed, as called for by the relevant plans, that all persons within the state parks would be evacuated at the declaration of an Alert, well before the declaration of a General Emergency when the guidance concerning the time for alerting and notification became relevant? Without answers to these and similar questions, the information provided has little, if any, significance. The evaluation of such drills is the function of FEMA. Applicants recently received FEMA's Evaluation Findings ("EF") of the April 15, 1982 drill. FEMA found the operations of State Parks satisfactory. EF p. ii. Applicants also note that during the drill no sirens were sounded, the public address system was not activated and the EBS system was not utilized. EF pp. I 5 and 12.

Nevertheless, Intervenors assert surprise and that it was not "fair" that Applicants offered evidence to demonstrate that the level of emergency preparedness met the applicable regulations and to rebut the Interim Findings. Intervenors had a full opportunity for discovery and to cross examine the representatives of FEMA, the offsite response organizations and Applicants concerning the current state of emergency preparedness as well as actions to be taken to improve emergency preparedness.6/ The ASLB made its finding based on the evidence before it. Intervenors have failed to cite a single instance where they were prejudiced by the conduct of the hearings.

This is not a record upon which a claim of denial of due process should be asserted, let alone sustained.

III. THE APPEAL BOARD SHOULD NOT RECONSIDER ITS DENIAL OF OTHER INTERVENORS' APPLICATION FOR A STAY.

The seismic issues in this proceeding have been contested by a different group of Intervenors, Carstens, et al. On April 26, 1982 this Appeal Board issued its Decision and Order denying Intervenors Carstens, et al.'s Application For A Stay of Low Power License. Intervenors Carstens, et al.

6/ Having stipulated to the close of discovery, and having been provided with ample opportunity to conduct additional discovery concerning FEMA's Interim Findings, Intervenors cannot now assert they were prejudiced thereby. Tr. 643-648. In addition, contrary to Intervenors' assertion, the hearings were not conducted on a rush basis. The hearings took place on nineteen days over a five-week period. The two attorneys representing Intervenors at the hearings had ample time to conduct their examinations and cross-examinations.

have now applied to the Commission for a stay. Intervenors Guard, et al. did not participate in the hearings with respect to the seismic issues and did not file an application for a stay of the PID. Moreover, they have forfeited any rights they might have had to challenge the PID when their appeal was dismissed. This Application does not properly raise any issues with respect to the PID and it should not be reconsidered by this Appeal Board.

IV. THE INTERVENORS HAVE FAILED TO SHOW IRREPARABLE INJURY.

The Intervenors allegations of irreparable harm are, at best, speculations regarding the likelihood and consequences of a nuclear accident during the period of appeal. Such speculation as a matter of law is insufficient to constitute the imminent and irreparable injury required to justify a stay of a licensing decision. State of New York v. NRC, 550 F.2d 745, 756-57 (2d Cir. 1977); Virginia Sunshine Alliance v. Hendrie, 477 F. Supp. 68, 70 (D.D.C. 1979).

Intervenors have failed to demonstrate any cognizable injury, much less the sort of immediate, irreparable injury pending appeal which is prerequisite to issuance of a stay. Public Service Company of Indiana (Marble Hill), ALAB-437, 6 NRC 630, 632 (1977); Philadelphia Electric Company (Peach Bottom), ALAB-158, 6 AEC 999 (1973).

V. THE GRANT OF A STAY WILL HARM APPLICANTS AND WOULD NOT BE IN THE PUBLIC INTEREST.

Intervenors' arguments that the grant of a stay will not inordinately harm other parties is entirely misplaced. The

harm to Applicants is set forth in the attached "Affidavit of Robert Dietch" (previously filed with this Appeal Board). Intervenors' characterization of the expense of delay as inherent to being in the nuclear industry and their refusal to recognize the significance of this substantial harm to the Applicants and the public at large is contrary to Appeal Board precedent. Public Service Co. of Indiana (Marble Hill), ALAB-487, 6 NRC 630, 634 (1977); Florida Power & Light Company (St. Lucie), ALAB-404, 5 NRC 1185, 1188 (1977).

It is generally recognized that the "public interest" lies with preserving the presumption of validity that attaches to licensing board decisions unless a substantial reason appears from the stay proponents papers for staying the effectiveness of such decisions. Florida Power & Light Company, supra, 5 NRC, at 1189. Intervenors have failed to make such a showing. Accordingly, the public interest demands that Intervenors' stay request be denied.

VI. CONCLUSION

For the reasons set forth above, Intervenors' Application should be denied in its entirety.

Respectfully submitted,

By EDWARD B. ROGIN
Edward B. Rogin
One of Counsel for Applicants

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of SOUTHERN CALIFORNIA EDISON COMPANY, et al. (San Onofre Nuclear Generating Station, Units 2 and 3).	)	Docket Nos. 50-360 OL 50-361 OL AFFIDAVIT OF ROBERT DIETCH IN OPPOSITION TO INTERVENORS' APPLICATION FOR STAY OF LOW POWER LICENSE

State of California,)
) ss.
County of Los Angeles.)

I, Robert Dietch, being first duly sworn, declare that if called to testify in this proceeding, I could competently do so, as follows:

1. At all pertinent times referred to herein, I have been employed by Southern California Edison Company ("SCE") as Vice President, Nuclear Engineering and Operation. In this capacity, I have direct management responsibility for Nuclear Regulatory Commission ("NRC") licensing proceedings and for the operation of the San Onofre Nuclear Generating Station ("SONGS").

2. The purposes of this affidavit are to demonstrate that construction of SONGS Unit 2 is complete; that Applicants are prepared to commence the fuel-loading and low-power testing program for SONGS Unit 2 in February, 1982; that to Applicants' knowledge there are no unresolved issues barring the issuance of the fuel-loading and low-power testing license for SONGS Unit 2; that it appears to

Applicants at this time that such issuance is imminent; that any delay in the Project Schedule for any reason, including the grant of the stay requested by the Intervenors, will result in substantial and irreparable injury to Applicants, Applicants ratepayers, and the environment; and that the radioactivity created by the low power testing program will not preclude the Applicants' capability to implement any plant modifications that may be required by the NRC.

3. On January 11, 1982, the Atomic Safety and Licensing Board (the "Board") of the United States Nuclear Regulatory Commission ("NRC") issued its Partial Initial Decision and Order authorizing issuance of a fuel-loading and low-power testing license for SONGS Unit 2. Under the NRC's Rules of Practice, the Board's Order is immediately effective and requires issuance of the license authorized by the initial Decision and Order within ten (10) days from the date of the decision or as soon thereafter as the NRC's Director of Nuclear Reactor Regulation (the "Director") can make the findings required by 10 C.F.R. § 50.57(a). The Partial Initial Decision and Order also required that the onsite Emergency Plan for SONGS Units 2 and 3 be in effect.

4. Since issuance of the Partial Initial Decision and Order the following items noted by Intervenors in their Application for a Stay have been completed:

> 4.1 The NRC Staff has announced that the required number of Senior Reactor Operators are now qualified to operate SONGS Unit 2.

4.2 An independent consultant has submitted to the Director a report on the Seismic Design Verification Program for SONGS Unit 2. Applicants have no reason to believe that this report is insufficient to justify issuance of a fuel-loading, low-power testing license for SONGS Unit 2.

5. The onsite Emergency Plan for SONGS Units 2 and 3 has been fully implemented, including complete implementing procedures and accomplishment of all required training. The NRC Staff has completed its inspection and is currently preparing its report to the Board regarding the onsite Emergency Plan. Based upon exit interviews with the NRC Staff, Applicants have no reason to believe that this report will not be favorable.

6. As of this date, I am informed and believe that all items remaining to permit the Director to make the necessary findings under 10 C.F.R. § 50.57(a) and issue the license for SONGS Unit 2 have been resolved and issuance of said license is imminent.

7. Construction of SONGS Unit 2 is substantially complete and the Project Schedule currently calls for fuel loading in February, 1982. All required equipment and personnel are onsite awaiting the issuance of the fuel loading, low-power testing license for SONGS Unit 2. Upon issuance of this license, a detailed low-power testing program will be accomplished. Completion of this program takes approximately 108 days of continuous activities and involves licensed operators supported by a group of about

twenty SCE start-up personnel, approximately ten start-up personnel from the Combustion Engineering Company, and various other technical experts from SCE and other vendors of major components, as required.

8. The record on the Applicants' application for full-power authorization for SONGS Units 2 and 3, is closed and no reason appears why issuance of an Initial Decision on this application cannot be issued by the Board well in advance of the completion of the low power testing program for SONGS, Unit 2. Based upon industry experience, it is unlikely that SONGS Unit 2 low-power testing program can be accomplished in much less time, and it may take more time. For example, Sequoyah Unit 1 took 147 days; Maquire Unit 1 took about 132 days; North Anna Unit 2 took 103 days, and Salem Unit 2 took 98 days. Accordingly, it reasonably appears to Applicants that any delay in commencing the low power testing program will result in a day-for-day delay in full-power operation of SONGS Unit 2.

9. Any delay in the Project Schedule for SONGS Unit 2 will result in substantial increases in the cost of the project. These costs will ultimately be borne either by the Applicants or the Applicant's ratepayers in the form of increased utility rates. A delay in the Unit 2 Project Schedule would result in additional costs of approximately $52.5 million per month, or $1.73 million per day, of delay. This cost increase is attributable to the following factors:

9.1 Cost of Alternative Fuel: In the event SCE is unable to operate SONGS 2, it must turn to fuel oil to generate the electricity which would otherwise have been generated by Unit 2. Approximately 0.9 million barrels of fuel oil per month would be needed to generate this power. This will result in additional fuel costs of $36 million per month.

9.2 Financing Costs: Applicants are precluded by law from recovering the costs of construction of the SONGS Unit 2 from the utility ratepayer until SONGS Unit 2 is placed in full-power operation. As a result, Applicants must finance all construction costs until SONGS Unit 2 is placed in full-power operation. These financing costs are approximately $12.5 million per month. Accordingly, each month of delay in placing SONGS Unit 2 in operation results in increased financing costs of $12.5 million.

9.3 Additional Costs: Additional operating costs would be incurred by the Applicants in the amount of approximately $4 million for each month in which Applicants are forced to maintain SONGS Unit 2 in a standby, nonoperational mode.

9.4 Environmental Costs: Because it will be necessary to burn an additional 0.9 million barrels of fuel oil in place of the nuclear fuel in the event operation of the SONGS Unit 2 is delayed, an additional 1350 tons per month of pollutants (based upon system simulation due

primarily to additional Nitrogen Oxides and Sulfur Dioxides) will be emitted relative to the amount of polluntants which will be emitted if the SONGS Unit 2 could be placed in operation.

10. It has been the industry experience that performance of repairs, maintenance and modifications after completion of low-power tests are not made significantly more difficult or costly by reason of fission products in the core or contamination of the primary coolant system resulting from low-power test. In fact, both Salem Unit 2 and North Anna Unit 2 have reported that after completion of low-power tests there was no increase in background radiation in the containment. Indeed, workers at Salem 2 performed a number of TMI-related improvements, including modifications requiring contact with the primary coolant, without protective clothing.

11. SCE has had substantial experience involving structural and mechanical modifications to SONGS Unit 1 after that reactor had been operating for a number of years at full power creating a much larger inventory of fission products in the core and in the primary coolant system than would be present at the completion of a low-power testing program. Based on SCE's experience, I would conclude that there is no work which cannot be accomplished at SONGS Unit 2 simply because low-power tests have been conducted and fission products are in the reactor core. Any work that might be

required would only result in minor cost increases due to special provisions to minimize worker radiation.

12. Based upon the considerations described above, I would conclude that while a decision to stay the low-power license is not required to preserve Applicants' ability to make whatever modifications the NRC should decide in the future are necessary, such a decision would immediately cause unnecessary and irreparable environmental damage and financial loss to Applicants, Applicants ratepayers and the public at large.

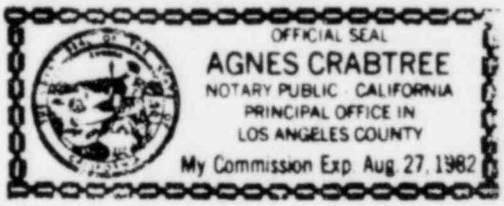
Robert Dietch

Robert Dietch

Subscribed and Sworn to
before me this 8th day
of February, 1982.

Agnes Crabtree

Notary Public, State
of California, County
of Los Angeles



CERTIFICATE OF SERVICE BY FIRST CLASS OR EXPRESS MAIL

I certify pursuant to 10 C.F.R. § 2.712(e)(2) that:

I am employed as an attorney in the City and County of San Francisco, California and am one of counsel for Southern California Edison Company and San Diego Gas & Electric Company.

I am over the age of eighteen years and not a party to the within entitled action; my business address is 600 Montgomery Street, 10th Floor, San Francisco, California 94111.

On June 7, 1982, I served the attached "APPLICANTS' RESPONSE IN OPPOSITION TO INTERVENORS GUARD, ET AL.'s APPLICATION FOR A STAY OF FULL POWER LICENSE" by placing a true copy thereof enclosed in the United States mail, first class (or by Express Mail, where asterisked), at San Francisco, California addressed as follows:

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Dated: June 16, 1982

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