



# Federal Emergency Management Agency

Washington, D.C. 20472

MAR 22 1995

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Mr. R. Lee Spessard, Director  
Division of Technical Support  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Spessard:

This is in response to your letter of November 23, 1994, to Dennis H. Kwiatkowski, Deputy Associate Director, Preparedness, Training and Exercises Directorate, requesting the assistance of the Federal Emergency Management Agency (FEMA) in addressing a petition for Director's Decision under 10 CFR 2.206 for the San Onofre Nuclear Generating Station (SONGS). The petition concerns emergency plans, evacuation routes, and the impact of Orange County's financial solvency on the emergency services provided to the City of San Clemente, California.

The Petitioner, Mr. Richard M. Dean, a Concerned Citizen of Orange County, asserts that although Southern California Edison had a plan to evacuate the residents of San Clemente in the event of an emergency at the SONGS facility, there is now no plan. In addition, the Petitioner asserts that since last winter, a very large landslide permanently closed the Pacific Coast Highway at the Dana Point/San Clemente border, and since this highway was one of two exit routes out of the area, Southern California Edison now requests that in the event of a nuclear emergency, all San Clemente residents should stay home. Lastly, Mr. Dean urges that SONGS be "shut down," based on headlines in the Los Angeles Times, which stated "...Orange County Files for Bankruptcy." Mr. Dean is concerned about the impact that the County's financial status would have on timely responses to 911 calls.

We have looked into these issues and the facts are as follows:

Mr. Dean should be informed that it is the public officials of Orange County and the City of San Clemente, not Southern California Edison, who are responsible for the safety of the citizens of San Clemente in the event of an incident at the SONGS facility. Furthermore, it was State and local officials, in coordination with SONGS representatives, who developed the offsite Radiological Emergency Preparedness (REP) plans and preparedness, under the provisions of 44 CFR, Part 350, to be implemented in the event of an incident at the site.

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Attachment 1

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PDC PIR: Mel Fields

In addition to the City of San Clemente, these REP plans include protective measures for all citizens who live within the SONGS emergency planning zone (EPZ). The EPZ includes portions of Orange County, San Diego County, and the Cities of San Juan Capistrano, Dana Point, and San Clemente.

These REP emergency plans have been in existence continuously; they were evaluated during eight biennial REP exercises, from May 1981 through September 1993. The next biennial REP exercise for SONGS is scheduled for October 11, 1995. During these biennial exercises, evacuation route impediments, such as this landslide, are simulated to test the capability of the offsite response organizations to deal with such a contingency. The California State and local officials continue to meet such challenges successfully during these biennial REP exercises. Based on the results of the eight prior REP exercises, as reported in findings from FEMA to the U.S. Nuclear Regulatory Commission, the offsite radiological emergency response plans and preparedness for the State of California and the affected local jurisdictions, site specific to the San Onofre Nuclear Generating Station, can be implemented and are adequate to provide reasonable assurance that appropriate measures can be taken offsite to protect the health and safety of the public in the event of a radiological emergency at the site.

Mr. Dean's assumption that there is only one route out of San Clemente, Interstate 5, is incorrect. Specifically, the initial landslide which closed the Pacific Coast Highway at the San Clemente/Dana Point border occurred on January 16, 1993. More landslides occurred in February 1993. An alternate route was established around the slide area. Substantial clearance of the slide had been completed and the Pacific Coast Highway had been scheduled to reopen in January 1995. From January 1995 to the current date the entire area has continued to sustain extremely heavy rainfall causing further delays in the reopening of the Highway. Weather permitting, work continues on removal of the blockage of the Pacific Coast Highway and State officials are exerting every effort to reopen the Highway as soon as possible. Although Pacific Coast Highway is not currently open to the general public, two lanes are open for construction traffic and could be used for emergency evacuation.

It should be noted that there are a total of ten sectors to be evacuated in the SONGS EPZ, of which only three comprise the City of San Clemente. The closure of the Pacific Coast Highway only affected the evacuation of Sector 3 of the City of San Clemente. In the event that Sector 3 should need to evacuate, only the northbound lanes of the Pacific Coast Highway would be used. Therefore, the citizens of San Clemente can be safely evacuated.

Concerning the Petitioner's statement that, "Southern California Edison informs all San Clemente citizens to sit home and 'glow in the dark or fry,'" he should be informed that Southern California Edison has not changed the content of the emergency information

included in the SONGS Emergency Instructions Brochure or in the Southern Orange County telephone book. Each document states that both sheltering and evacuation are possible protective actions, in the event of an incident at the site.

In response to Mr. Dean's concern about the financial status of Orange County and its ability to respond to 911 calls, Orange County officials are aware that their financial situation presents a major challenge in restructuring and prioritizing services to meet their objectives and mandates within their available resources. However, the Board of Supervisors recognizes the primary mission of the County is the protection of the health, safety, and welfare of the citizens and the visitors to Orange County. During this financial crisis the Board has repeatedly reiterated and publicly confirmed these services to be the priority for all County agencies and departments, including those provided to contract cities such as San Clemente. In addition, a representative of the County is an active participant of the SONGS Interjurisdictional Planning Committee (IPC), which meets on a formal basis with officials of SONGS, the affected cities, the Camp Pendleton Marine Corps Base, the State Department of Parks and Recreation, the Capistrano Unified School District, San Diego County, and Federal and State emergency organizations to coordinate their nuclear power plant plans, preparedness, and procedures for emergency response to an emergency or incident at the SONGS site. The IPC also coordinates the multi-agency planning, training, and drilling for multi-hazard emergency response. The IPC representatives meet at least monthly to ensure their planning and preparedness measures are thoroughly coordinated and current.

I trust the above information will be responsive to your request for assistance in responding to the Petitioner's allegations. Do not hesitate to call me at (202) 646-2867 or Dr. Anne Marie T. SuPrise at (202) 646-4065, should you have questions or require additional information concerning this matter.

Sincerely,

*O. Megs Hepler, III*  
O. Megs Hepler, III  
Director  
Exercises Division  
Preparedness, Training, and  
Exercises Directorate

cc:  
Kay C. Goss  
Dennis H. Kwiatkowski