(14)

Interjurisdictional Planning Committee

County of Orange•County of San Diego•City of San Clemente•City of San Juan Capistrano
City of Dana Point•California State Parks•U. S Marine Corps•Southern California Edison

DOCKETED
USNRC

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

DOCKET NUMBER
PETITION RULE PRM 50-79
(67FR66588)

December 11, 2002

Ms. Annette Vietta-Cook
Secretary
US Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attn: Rulemakings and Adjudications Staff

Subject: Petition for Rulemaking filed by Lawrence T. Christian (Docket No. PRM-50-79)

Dear Ms. Vietta-Cook:

The Interjurisdictional Planning Committee (IPC) is a group of representatives from all of the offsite planning jurisdictions within the Emergency Planning Zone (EPZ) of the San Onofre Nuclear Generating Station (SONGS). One of the priorities in support of the IPC mission is to support the development and integration of emergency response plans for schools within the SONGS EPZ. This is accomplished in two ways. First, by including a representative of the Capistrano Unified School District (CUSD) as an associate member of the IPC; and second, through the formation of a Private Schools Sub-Committee.

The Private Schools Sub-Committee maintains the "Model Nuclear Power Plant Emergency Plan for Private Schools & Childcare Facilities." This document is provided to private schools and childcare facilities to aid them in developing a working Nuclear Power Plant Emergency Plan specific to their location. It also educates them on the broader emergency plan for the area that will be implemented should a power plant emergency occur. The Sub-Committee members also maintain a list of all the privately owned and operated elementary schools, middle schools, high schools, pre-schools, and childcare facilities that can be identified within the EPZ. This list is incorporated into the County of Orange Nuclear Power Plant Emergency Response Plan, and is used to alert these facilities of an emergency situation and any protective action decisions. A copy of the IPC Private Schools Model Plan has been included with this letter for reference.

The IPC supports the premise of the petition filed by Mr. Christian, and recognizes the benefits of requiring nuclear power emergency plans for childcare facilities within emergency planning zones. However, the IPC harbors several concerns over issues raised by the petition. Our specific concerns are as follows:

- Section I, Part B, Item 2 – Designated transportation with emergency bus drivers for all daycare centers and nursery schools.

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- Public transportation out of the SONGS EPZ during an evacuation is currently provided in several ways.
  1. Public Schools are evacuated using a combination of CUSD buses and Orange County Transportation Authority (OCTA) public transportation buses.
  2. Special Assistance buses provided by OCTA are assigned to pick up the identified special needs population.
  3. OCTA also provides buses for 41 established Transportation Assembly Points in the EPZ where the general public can go if they are unable to transport themselves.
- The IPC is concerned about placing additional responsibility on government owned/operated resources for the transportation of privately operated school and childcare facilities. Any new regulation requiring transportation of this population should include specific language to clarify that ownership of this responsibility lies with each privately operated facility.

➢ Section I, Part B, Item 3 – Assigned and installed approved-child-safety seats that meet state and federal laws as they pertain to the transportation of children and infants under 50 lbs. or under the height of 4'9".

- Any new regulation requiring the transportation of children and infants and the use of approved appropriate restraint seats should include specific language to identify that it is the responsibility of the privately owned/operated facility to arrange for each child to have an approved and appropriate child seat.
- Additional requirements include the identification of the person, group, or agency that is responsible for validating that a seat is appropriate for a given child and that it is installed correctly in the vehicle that is to transport the child.

➢ Section I, Part B, Item 4 – Working rosters of designated emergency bus drivers with a means in place of notifying them in the event of a radiological emergency.

- Any new regulation requiring the development and maintenance of a list of emergency transportation drivers for privately owned and operated childcare facilities should state that it is the responsibility of the individual facility to develop and maintain such a list for their use.

➢ Section I, Part B, Item 5 – Notification to emergency management officials, annual site inspections of daycare and nursery schools and inclusion of radiological emergency preparedness exercises…

- The IPC is concerned that this requirement could represent a paradigm shift in the emergency management field. Emergency Management is generally a planning/response function, not an enforcement or regulatory agency.
- Additional concerns involve the requirement to include businesses in the emergency exercise process. Will this change the existing FEMA REP guidelines and exercise evaluation criteria?

- Any new regulation requiring the inspection of childcare facilities for compliance with radiological emergency response plans should identify the requirements to be met during a site inspection and the agency responsible for conducting such an inspection. The IPC strongly recommends that this responsibility lie with the applicable licensing agency.

➢ Section I, Part B, Item 8 – KI Tablets and educational materials to be stocked at all daycare centers and nursery schools located in the evacuation zone.

- The NRC has already made KI available to States wishing to accept it for the general public within the EPZs of nuclear power plants. California has accepted the KI, and the IPC is working with State Officials to determine the appropriate management of this stockpile and any distribution methods of KI within the SONGS EPZ. The administration and issuance of drugs in a school or childcare environment is not to be undertaken lightly and the IPC position is that a clear understanding of the use and limitations and appropriate doses of KI is critically important, in addition to an understanding of the Government Official who authorizes the use of KI during an emergency.
- Additionally, the IPC would like to stress, as the NRC has previously indicated, that KI is merely a supplement to evacuation. The best solution to avoid exposure of critical receptor populations, such as school children, is to evacuate them prior to any release of radiation. Emergency plans developed for the SONGS EPZ have established the evacuation of Public Schools for a Site Area Emergency (SAE) with offsite radiological consequences, and the notification of private school facilities, within the EPZ when a SAE is declared. The intent of this plan is to evacuate the children from the EPZ before there is any potential for the release of radiation beyond the boundary of the plant.
- Any new regulation requiring the stockpiling of KI tablets at a privately operated childcare facility should clearly state that:
  1. It is the facility's responsibility to maintain enough current and age appropriate doses for all children and employees;
  2. KI should be issued when authorized by the appropriate Health Officer charged with making the decision to issue KI to emergency workers and the general public; and
  3. KI should be issued only when it will not impede or slow the evacuation process.

In addition to these specific concerns, the IPC would like to stress the importance of clarifying the definition of the facilities targeted by this petition. Any regulatory requirements imposed upon offsite Emergency Management agencies should be limited to identifiable licensed facilities, and any enforcement actions should be the responsibility of the appropriate facility licensing agency.

Finally, the members of the IPC agree that any requirements imposed upon these facilities should be used to supplement an "all hazards" approach to emergency planning. An emergency situation involving the release of radioactive material into the environment, is possible, but is statistically unlikely in comparison to many other emergencies requiring the evacuation of the general public. Here in California, our population is far more likely to be exposed to earthquakes, fires, or hazardous

materials releases, than to radiation released from a nuclear power plant. Emergency plans should be developed to protect the target population from the most likely hazards, rather than made specific to only one.

Sincerely,

Linda Bomberg

Linda Bomberg
IPC Chairperson

Attachments: ***Model Nuclear Power Plant Emergency Plan for Private Schools & Childcare Facilities***

cc: Michael Rose, City of Dana Point, Chairperson – IPC Private School Sub-Committee
Brian Perry, City of San Juan Capistrano
Jim Russell, City of San Clemente
Susan Asturias, County of San Diego
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Interjurisdictional Planning Committee
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County of Orange · County of San Diego · City of San Clemente City of San Juan Capistrano
City of Dana Point California State Parks · U S Marine Corps · Southern California Edison

Model Nuclear Power Plant Emergency Plan For Private Schools & Childcare Facilities

Within the San Onofre Nuclear Generating Station
Emergency Planning Zone

September 2002

FOREWORD

This document has been prepared as a model emergency plan for use by private schools and childcare facilities within ten miles of the San Onofre Nuclear Generating Station.

When a nuclear power plant emergency occurs, school administrators must determine if they will cancel school, dismiss children early, or put them on buses destined for reception centers outside the hazard area. The school administrators must also determine what information and instructions they will provide to parents regarding the actions they have taken, and how children will be reunited with their parents.

During an emergency, the utility owner will work with city, county, state, and federal governments to determine if there is the potential for a release of nuclear radiation. If the conditions warrant, a system of sirens and the Emergency Alert System will be used to alert the public of the incident.

When the sirens are sounded, the public should tune to local radio and television stations. The information broadcast over radio and television will outline what has happened and provide further instructions.

When warranted, the Orange County School Coordinator will contact private schools and childcare facilities to determine if additional bus transportation is required to relocate children to reception centers. It is the school's responsibility to identify their transportation requirements.

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SECTION I
INTRODUCTION

A. PURPOSE

Private schools and childcare facilities within ten miles of a nuclear power plant, such as San Onofre Nuclear Generating Station, should have a policy on how they will provide for the care, safety and welfare of children, personnel, and property in the event of an emergency. This document is intended to serve as a model emergency plan to meet that need. This emergency plan may be adopted as written or modified by the private school or childcare facility to conform to its existing policies and procedures. The model emergency plan addresses the following areas:

1. Characteristics of a nuclear power plant emergency and potential health hazards.
2. Agencies involved with emergency preparedness.
3. Emergency classification levels used to describe the severity of an emergency.
4. The protective actions that schools can take to protect children and faculty.
5. An emergency preparedness program that allows for the maximum utilization of school personnel, facilities and equipment during an emergency.
6. Emergency procedures.
7. Methods for informing parents about the emergency plan and how they will be notified of an emergency.
8. Recommendations on how to maintain this plan and train on its procedures.

B. SCOPE

The model emergency plan outlines the "who, what, where, why, when, and how" of managing a response to a nuclear power plant emergency: who is involved with emergency planning and response; what should be done in the event of a nuclear power plant emergency; where should evacuees go during the emergency; why do local governments order an evacuation; when should private schools and childcare facilities take action; and how should these agencies organize to manage the emergency.

SECTION II
BASIC PLAN

A. NUCLEAR POWER PLANT CHARACTERISTICS

The San Onofre Nuclear Generating Station (SONGS) is located on the coast of Southern California in San Diego County, approximately 2-1/2 miles southeast of the City of San Clemente. The site is located entirely within the boundaries of the United States Marine Corps, Camp Pendleton, California.

B. POTENTIAL HEALTH HAZARD

A release of radiation during a nuclear power plant emergency could present a potential health hazard to the public. In living organisms, radiation causes the removal of electrons from the atoms, which forms ions or charged atoms. These ions react with other atoms in human cells resulting in cell damage.

At low radiation doses, such as background radiation received every day from the earth and sun, human cells repair the damage rapidly. At higher doses, the cells might not be able to repair the damage, and are either changed permanently or die. In general, when cells die off, the body has the ability to regenerate them. However, cells that are permanently changed may reproduce abnormal cells when they divide. Under the right circumstances, these cells may become cancerous.

According to federal records, the public has never received high radiation doses as a result of an emergency at a United States nuclear power plant. The objective of this plan is to further reduce the chance of public exposure to radiation should such an emergency occur.

C. AGENCIES INVOLVED WITH EMERGENCY PLANNING

Government agencies, schools, businesses, community organizations and the general public should be aware of actions to take before, during, and after an emergency occurs at a nuclear power plant.

1. Southern California Edison

Southern California Edison (SCE) is the primary owner and operator of San Onofre Nuclear Generating Station (SONGS). SCE has the primary responsibility for the management of all onsite activities, responses, and coordination relative to any incident.

2. **Federal, State, And Local Governments**

Government agencies are responsible for directing and controlling the response to emergencies within their respective jurisdictions. A contact list for local government authorities is shown on Table 1.

3. **Private Schools And Childcare Facilities**

The administrators of private schools and childcare facilities are responsible for the safety of children and faculty when the emergency occurs. A list of private schools and childcare facilities is shown on Table 2.

D. EMERGENCY PLANNING ZONE

The federal government requires that communities within approximately ten miles of a nuclear power plant be included in an Emergency Planning Zone (EPZ). Jurisdictions within the EPZ include the City of San Clemente, City of San Juan Capistrano, City of Dana Point, County of Orange, County of San Diego, State Parks, and Marine Corps Base, Camp Pendleton. All residents within the EPZ receive instructions about emergency plans including protective measures, evacuation routes and shelter locations. These instructions are located in the customer guide section of the Pacific Bell Telephone Book, Orange County South edition. Figure 1 illustrates the Emergency Planning Zone for the San Onofre Nuclear Generating Station.

E. EVACUATION DISTRICTS

For planning purposes, the Emergency Planning Zone has been divided into ten evacuation districts. Each evacuation district is assigned a reception center at least twenty miles away from the nuclear power plant. Private schools and childcare facilities that elect to transport their children to a reception center should determine the evacuation district in which they are located ahead of time. An illustration of evacuation districts is shown in Figure 2. The location of pre-designated reception centers is shown in Figure 3. A description of evacuation districts and reception centers is shown in Table 3.

F. NUCLEAR EMERGENCY CLASSIFICATION LEVELS

A standardized method has been established by the U.S Nuclear Regulatory Commission (NRC) to classify the severity of an accident at a commercial nuclear power plant. The NRC requires that when conditions exist to initiate an emergency classification level, the nuclear utility operator shall provide early and prompt notification to local, state, and federal officials. The following emergency classes will be used for such notification:

- Unusual Event
- Alert
- Site Area Emergency
- General Emergency

In all categories, the nuclear utility operator will immediately inform local, state and federal officials.

1. Unusual Event

Unusual Events are off-normal plant conditions which could indicate a potential degradation of the level of safety of the plant, or which could attract significant public interest. These events do not constitute significant emergency conditions in themselves, but could escalate to more severe conditions if appropriate action is not taken. No response by other local agencies or the public is necessary.

2. Alert

An Alert classification is characterized by events that are occurring or have occurred that involve actual or potential degradation of plant safety. It constitutes the lowest level where emergency offsite response may be anticipated. Minor controlled radioactivity releases may occur. However, these releases are not expected to exceed the Environmental Protection Agency guidelines.

One purpose of the Alert classification is to assure that emergency personnel are readily available to respond if the situation becomes more serious. Although public action may not be required, county and city emergency operations centers will be activated and emergency response organizations will be mobilized and ready to implement protective measures. Private schools in the EPZ should be notified of an Alert, and some schools may choose to close.

3. Site Area Emergency

A Site Area Emergency is characterized by events involving actual or probable failures of plant functions needed for public protection. Although public action may not be required, county and city emergency operations centers will be activated and emergency response organizations will be mobilized and ready to implement protective measures should they become necessary.

Private schools in the EPZ should be notified of a Site Area Emergency and some schools may choose to close. Voluntary protective actions, particularly sheltering or closure of schools may be advisable for some events within the Site Area Emergency classification.

4. General Emergency

A General Emergency is the most serious type of an accident that could occur. It is characterized by events occurring or which have occurred involving actual or imminent substantial core damage, with potential for loss of containment integrity and a release of radioactivity to the environment. Protective actions, including evacuation, may be necessary.

Private schools in the EPZ should be notified of a General Emergency. Protective actions, particularly school closure, evacuation, or sheltering-in-place will be recommended at this classification by Orange County health officials.

G. PROTECTIVE ACTIONS

Local, state, and federal governments order public protective actions based on recommendations made by the nuclear utility. There are two basic measures available that can be used to reduce or eliminate the effects of radioactive contamination and/or the effects of direct exposure to nuclear radiation. They are to either shelter-in-place, or evacuate.

1. Sheltering-in-Place

The use of this protective action involves keeping the radioactive material at a distance by staying indoors and using the structure as a shield against the radiation being emitted. Heavier (denser) construction materials provide better shielding, therefore, in many cases, the business structure (i.e., the bank building, the well-constructed shopping center, etc.), provides better protection. Citizens will be warned by sirens or by other means (i.e., public address systems) to turn on their radios or televisions for further information.

Generally, sheltering will be considered when a severe and rapidly deteriorating accident occurs and evacuation cannot be initiated successfully due to a lack of time, when evacuation is not feasible or effective due to local constraints such as severe weather, bad roads, etc., or when the only means of protecting those people whose mobility may be impaired due to such factors as institutional confinement or health risk.

2. Evacuation

Evacuation involves moving the general public out of an area that has the potential to be exposed to radioactive contaminants. This requires in-depth pre-planning and complete cooperation of affected government agencies and the general public. It is anticipated that, should evacuation be required, it will be implemented well in advance of a radiation release. The people being evacuated will be directed to reception centers well away from the area of the emergency.

H. ALERTING THE PUBLIC OF AN EMERGENCY

The public is advised of nuclear power plant emergencies through an "alert and warning system" consisting of sirens and Emergency Alert System messages on radio and television. Should an emergency occur at SONGS, utility officials will immediately contact local, state and federal authorities. If warranted, government authorities will alert the public by sounding the community alert siren system located within ten miles of the

power plant. When the public hears the sirens, they should turn on radio and television to receive details about the emergency and information on actions they should take.

I. NOTIFYING SCHOOLS

When private school and childcare facility officials hear the sirens, they should follow the same instructions as those issued to the general public. When time permits, the Orange County Schools Coordinator will call each school on the current list of Private Schools and Childcare Facilities to make them aware of the emergency, and determine if any transportation assistance is requested.

J. SUGGESTED SCHOOL RESPONSIBILITIES

Private schools and childcare facilities should be prepared to respond to a nuclear power plant emergency upon notification of an ALERT or higher emergency classification. It is recommended that the following responsibilities be adopted by each organization:

1. Protecting the health and safety of children and faculty.
2. Closing the school at the ALERT or higher emergency classification.
3. Promptly notifying parents of the school closure.
4. Implementing an orderly method for parents to pick-up their children.
5. Conducting an orderly evacuation of children and faculty if closure is not possible due to rapid escalation of events.
6. Sheltering children and faculty if closure or evacuation is not practical.
7. Reuniting children with parents after an evacuation or sheltering.

Figure 4 illustrates a model layout for student evacuation or reunification with parents.

K. EMERGENCY ORGANIZATION

Each school should pre-identify an emergency organization. The organization at the school should be organized to address the following functions:

- Overall Emergency Coordination
- Communications Coordination
- Transportation Coordination
- Assembly Coordination
- Parental/Guardian Coordination
- Security

1. **School Administrator**

   The School Administrator is responsible for overall command, coordination and management of the emergency, including decisions to close the school, evacuate children and faculty, or shelter in place. The emergency procedure for this function is described in Section III.

2. **Communications Team Leader**

   The School Administrator should assign a Communications Team Leader who is responsible for establishing and maintaining communications with the County of Orange or other authority. The emergency procedure for this function is described in Section III.

3. **Assembly Team Leader**

   The School Administrator should assign an Assembly Team Leader who is responsible for establishing and maintaining an assembly area for children until parents can pick them up, or until an evacuation is ordered. The emergency procedure for this function is described in Section III.

4. **Transportation Team Leader**

   The School Administrator should assign a Transportation Team Leader who is responsible for the management of traffic control operations related to the closure or evacuation of the school. The emergency procedure for this function is described in Section III.

5. **Parental Assistance Team Leader**

   The School Administrator should assign a Parental Assistance Team Leader who is responsible for reuniting children and parents at designated reunion area. The emergency procedure for this function is described in Section III.

6. **Security Team Leader**

   The School Administrator should assign a Security Team Leader who is responsible for securing and locking the school if closed or evacuated. The emergency procedure for this function is described in Section III.

Figure 5 illustrates a model emergency organization based on the functions listed above. The organization and functions may be condensed or combined to suit the school's needs.

L. NOTIFYING PARENTS OF SCHOOL ACTIONS

Private schools and childcare facilities should advise parents of actions the school will take in an emergency. If children are to be evacuated to pre-designated reception centers, parents should be advised in advance of the reception center address so they can reunite with their children at that location.

M. RELEASING CHILDREN TO PARENT OR GUARDIAN

Once the decision has been made to reunite children with parents at the private school or the reception center, the School Administrator should ensure that children are released only to the parent or guardian. If the children are transported to a reception center, school faculty should work with the reception center staff to ensure the children's safety and welfare until they are returned to their parents.

N. EVACUATION TRANSPORTATION

In the event an evacuation is ordered, the school should arrange for its own transportation of children and faculty, if needed. Private schools lacking transportation may request transportation from the County of Orange. The Orange County School Coordinator will arrange for buses to transport children and faculty out of the affected area. Emergency telephone numbers for the above officials are shown in Table 1. If children are evacuated using Orange County buses, they will be taken to the reception centers corresponding to the evacuation districts where the school is located. Evacuation districts and associated reception center locations are shown in Table 3.

O. PLAN MAINTENANCE

Administrators of private schools or childcare facilities should review this plan annually. An electronic copy of the plan can be obtained from local government authorities if school administrators want to modify it to meet their own planning needs. Each school should have a system in place to keep parents' telephone numbers up to date.

P. TRAINING AND EXERCISES

The School Administrator should arrange for faculty training and drills on the emergency plan and procedures as part of the school's regular training program. Tabletop or practical drills should be conducted to test the plan's effectiveness. Tabletop drills might include a discussion of an accident scenario and the actions the faculty will take. Practical exercises might include setting up the positions outlined in the plan to see if there are adequate resources to carry out the concepts described.

FIGURE 1
Emergency Planning Zone
For The San Onofre Nuclear Generating Station

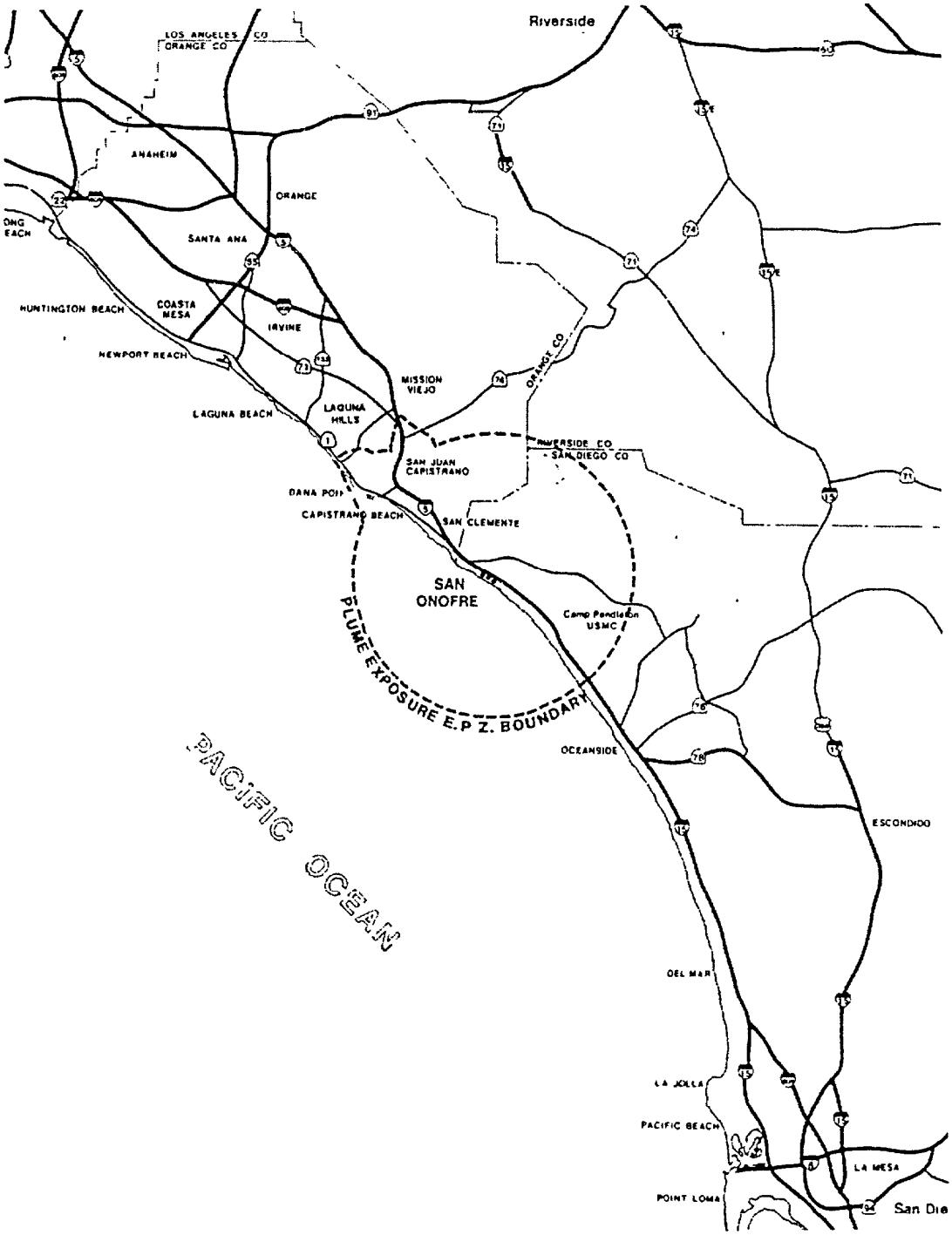


FIGURE 2
Evacuation Districts
Within The Emergency Planning Zone

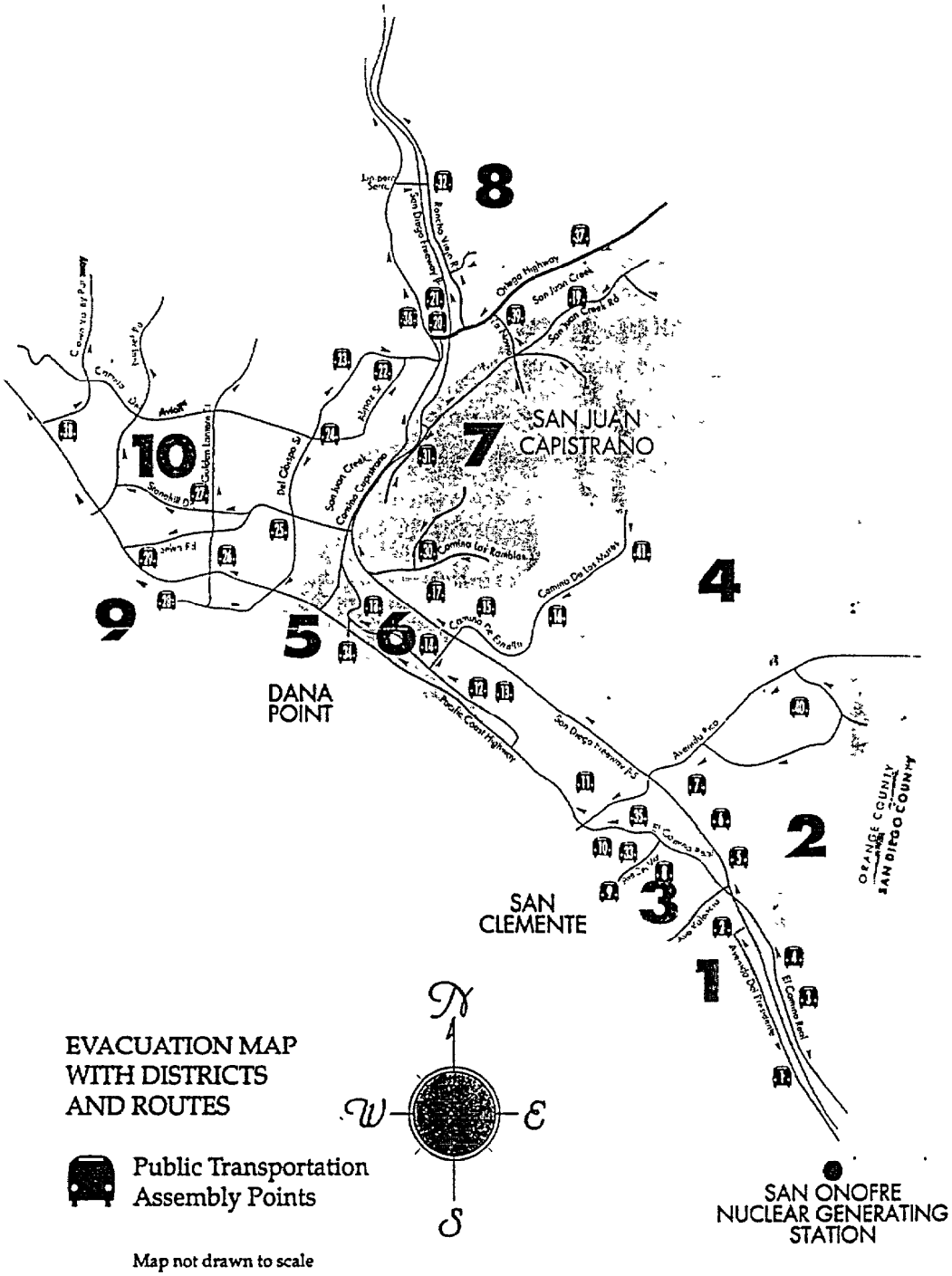
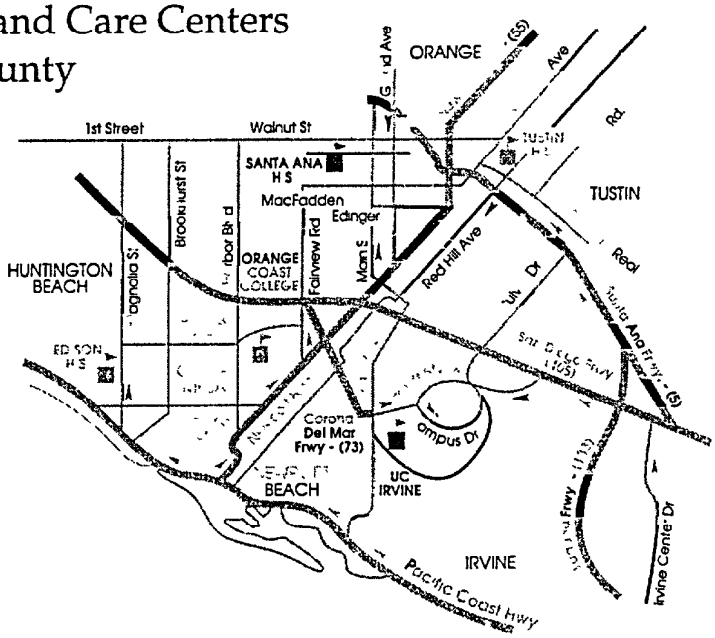


FIGURE 3
Reception Center Locations

EVACUATION ROUTES:
Reception and Care Centers
Orange County



Areas North of San Onofre Nuclear Generating Station

District	Reception and Care Center	Route North
1, 2 and 10	University of California Irvine University Drive between Bridge Road and Berkley Avenue, Irvine	I-5 or I-405
3	Same as Above	Pacific Coast Highway
4, and 6	Orange Coast College 2701 Fairview Road Costa Mesa	I-5 or I-405
5	Same as Above	Pacific Coast Highway
7	Santa Ana High School 520 W. Walnut Street Santa Ana	I-5
8	Tustin High School 1171 El Camino Real Tustin	I-5
9	Edison High School 21400 Magnolia Street Huntington Beach	Pacific Coast Highway

FIGURE 4
Model Layout For Evacuation Or Reuniting Children With Parents

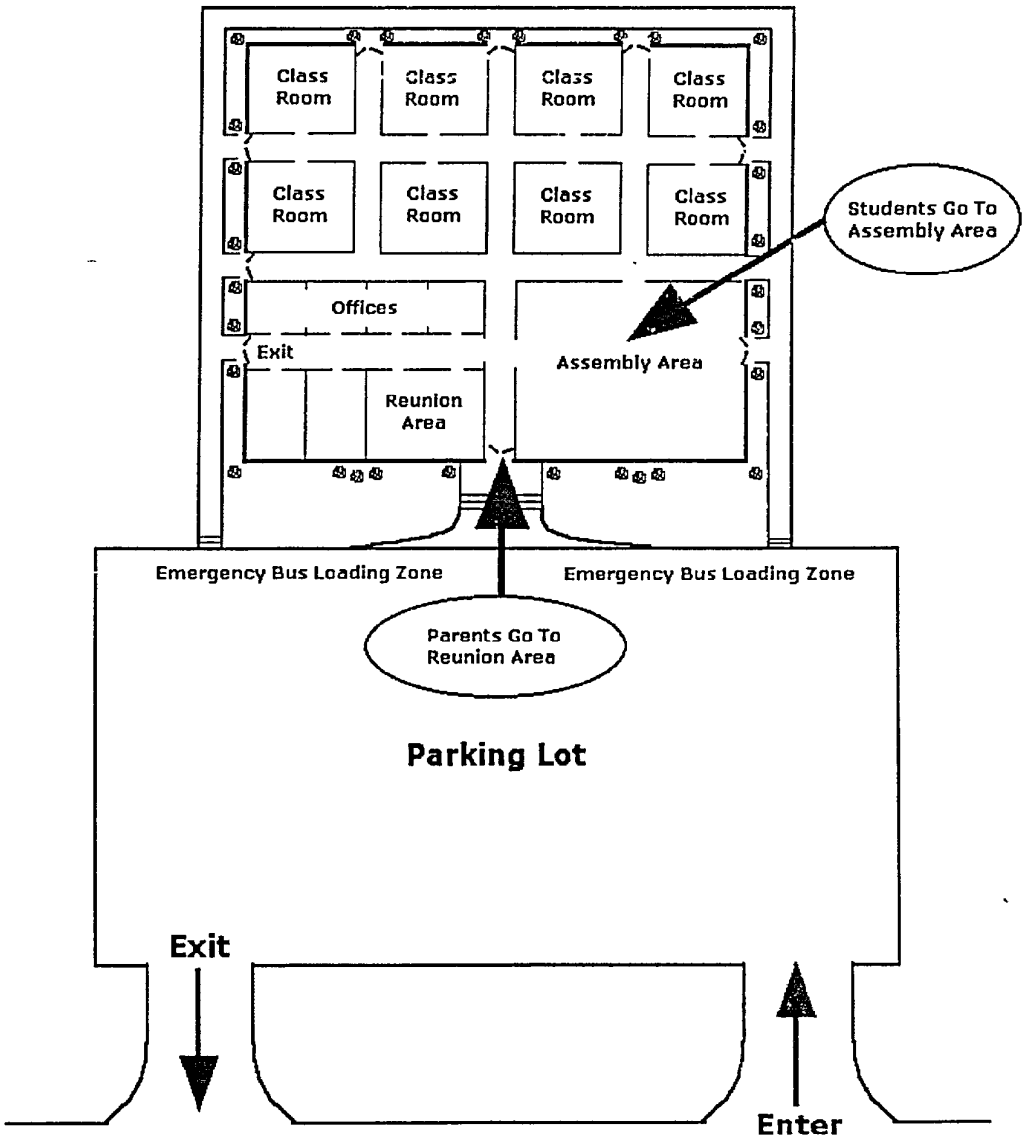


FIGURE 5
Model Emergency Organization

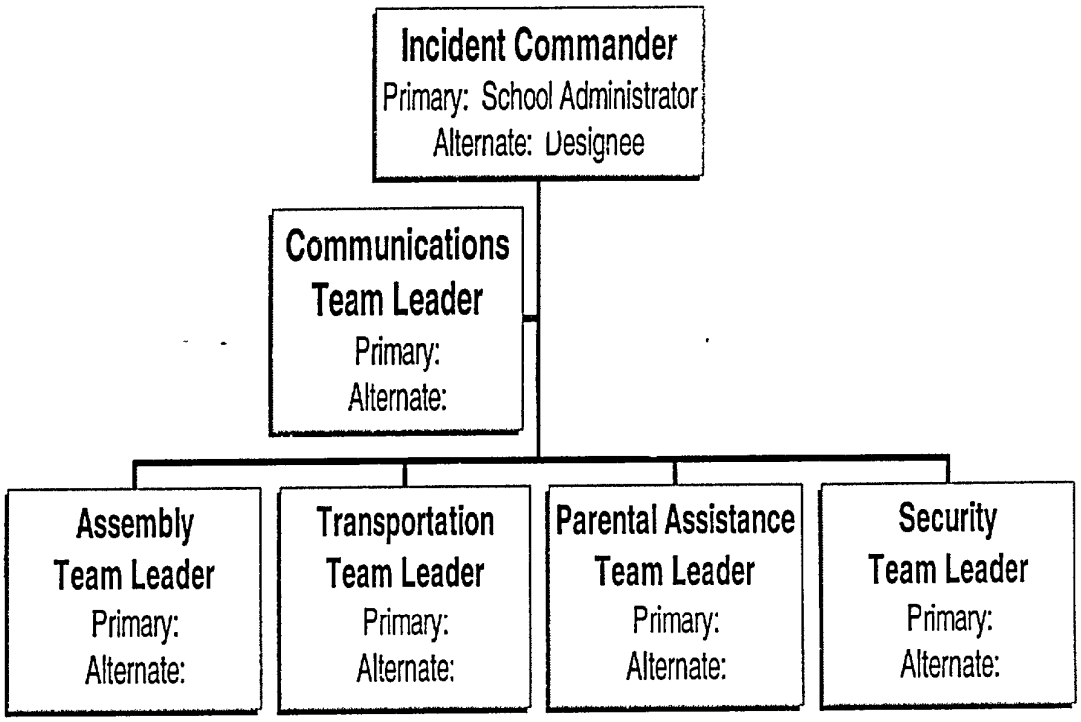


TABLE 1
Local Government Authorities

City of Dana Point

Emergency Services Department (Monday through Friday) ..... (949) 248-3535
Emergency Operations Center (When Activated)..... (949) 234-2800

City of San Clemente

Emergency Planning Officer (Monday through Thursday) ..... (949) 361-6109
Emergency Operations Center (When Activated)..... (949) 366-4705

City of San Juan Capistrano

Emergency Services Coordinator (Monday through Friday)..... (949) 443-6353
Emergency Operations Center (When Activated)..... (949) 443-6337

County of Orange

Emergency Management Division (Monday through Friday) ..... (714) 628-7055
Emergency Operations Center (When Activated)..... (714) 628-7060
Orange County Schools Coordinator (When EOC is Activated)..... (714) 628-7145

TABLE 2
Private Schools Within The Songs Emergency Planning Zone[1]

Evacuation District	Dana Point	Phone Number
6	Capistrano Beach Calvary School, 25975 Domingo Ave, Dana Point	(949) 496-3513
6	Nobis Children's Center, 26153 Victoria, Dana Point	(949) 661-6258
6	Wee Can Pre-School, 34240 Camino Capistrano, Dana Point	(949) 488-7939
9	Broderick Montessori School, 24292 Del Prado Ave., Dana Point	(949) 443-1193
9	Dana Pre-School, 34052 Violet Lantern, Dana Point	(949) 240-7271
9	Gloria Dei Lutheran Pre-School, 33501 Stonehill Dr., Dana Point	(949) 493-3596
9	Happy Campers Pre-School, 33501 Del Obispo Ave., Dana Point	(949) 443-4213
9	St. Edwards Parish Pre-School, 33926 Calle La Primavera, Dana Point	(949) 240-8485
9	St. Edwards Parish School, 33926 Calle La Primavera, Dana Point	(949) 496-1241
10	South Shores Christian Pre-School, 32712 Crown Valley Pkwy, Dana Point	(949) 496-5032
	San Clemente	
2	KinderCare Learning Center, 1141 Puerto del Sol , San Clemente	(949) 361-4860
2	Our Lady of Fatima School, 105 S. La Esperanza, San Clemente	(949) 492-7320
2	Our Savior's Lutheran Elementary & Pre-School, 200 Avenida San Pablo, SC	(949) 492-6165
2	San Clemente Presbyterian Pre-School, 119 Avenida de Estrella, San Clemente	(949) 492-6158
3	Boys & Girls Club of San Clemente, 1304 Calle Valle, San Clemente	(949) 492-0376
3	Serra Parent Co-op Pre-School, 1005 Calle Puente, San Clemente	(949) 492-8188
3	St. Michael's Academy, 107 W. Marquita, San Clemente	(949) 366-9468
3	St. Michael's Pre-School, 107 West Marquita, San Clemente	(949) 366-0130
3	St. Michael's Infant/Toddler Center, 702 North Avenida de Estrella	(949) 498-0128
3	Stepping Stone Pre-School, 130 Avenida Granada, San Clemente	(949) 492-6600
4	Early Explorations, 2015 Calle Frontera, San Clemente	(949) 492-5555
4	Faith Lutheran Church & Head Start Pre-School, 34381 Calle Portola, SC	(949) 661-5243
4	La Cristianita Pre-School, 35522 Camino Capistrano, San Clemente	(949) 496-1405
4	Palisades United Methodist Church Pre-School, 27002 Camino de Estrella, SC	(949) 661-3375
4	Top of the Hill Mother's Day Out, 2001 Calle Frontera, San Clemente	(949) 492-4595
	San Juan Capistrano	
8	St. Margaret's Episcopal School, 31641 La Novia Ave, San Juan Capo	(949) 661-0108
8	Capistrano Valley Christian School, 32032 Del Obispo, San Juan Capo	(949) 493-5683
8	Capistrano Valley Head Start, 31485 El Camino Real, San Juan Capo	(949) 661-8029
8	Childbridge Pre-school , 31113 Rancho Viejo Rd, San Juan Capo	(949) 661-3355
8	Community Presbyterian Pre-School, 32202 Del Obispo, San Juan Capo	(949) 493-9141
8	Mission San Juan Capistrano Parish School, 31641 El Camino Real	(949) 248-2050
8	Saddleback Valley Christian School, 26333 Oso Rd, San Juan Capo	(949) 443-4050
8	San Juan Montessori Pre-School, 32143 Alipaz, San Juan Capo	(949) 496-2927
8	San Juan Pre-School, 26891 Spring St., San Juan Capo	(949) 493-0688
8	Stonebridge Day School, 32091 Alipaz, San Juan Capo	(949) 496-6776
8	Stoneybrooke Christian School, 26300 Via Escolar, San Juan Capo	(949) 364-4407
8	San Juan Head Start, 32204 Del Obispo, San Juan Capo	(949) 661-5243

[1] Pacific Bell Smart Yellow Pages, April 2001, and Southern California Edison

TABLE 3
Evacuation Districts and Associated Reception Center Locations

District / Jurisdiction	Evacuation Procedures
District 1 **San Clemente:** Areas of San Clemente west of I-5 and south of Avenida Valencia.	**Go to UC Irvine** **Directions:** The Population from the area south of San Clemente State Beach should use the Avenida Del Presidente/I-5 interchange at the southern City limit. The population south of West Avenida Del Los Lobos Marinos to and including San Clemente State Beach should enter the freeway at the Magdalena on-ramp via the Avenida Mendocino overpass. The population north of West Avenida San Antonio, should use the Avenida Presidio or Avenida Palizada northbound I-5 on-ramp. Take I-5 northbound to the I-405 junction. Continue on I-405 to the University Drive interchange. Exit and take University Drive westbound to Campus Drive. Evacuation traffic will be directed to the reception center location.
District 2 **San Clemente:** Areas of San Clemente east of I-5, north of the Orange County/San Diego County line and south of Avenida Pico.	**Go to UC Irvine** **Directions:** All evacuation traffic exiting via South El Camino Real should use either Magdalena on-ramp or the northbound I-5 on-ramp at the South El Camino Real underpass. All traffic exiting evacuation district 2 via Avenida Presido, Avenida Palizada, or Avenida Pico should use the respective I-5 northbound on-ramp. Once northbound on I-5, continue to the I-405 junction and then take I-405 to University Drive interchange. Exit the freeway and take University Drive westward to Campus Drive. At this point, evacuation traffic will be directed to the reception center location.
District 3 **San Clemente:** Areas of San Clemente west of I-5, north of Avenida Valencia and south of Avenida Pico.	**Go to UC Irvine** **Directions:** All traffic should evacuate to the north on Pacific Coast Highway. Proceed northbound on Pacific Coast Highway to MacArthur Boulevard. Take MacArthur Boulevard northbound to University Drive. Turn right (east) on University Drive and continue to Campus Drive. At this point, traffic will be directed to the location of the reception center on the U.C. Irvine Campus.

District / Jurisdiction	Evacuation Procedures
District 4 **San Clemente:** Areas of San Clemente north of Avenida Pico, east of Pacific Coast Highway and south of the San Juan Capistrano city limits.	**Go to Orange Coast College** **Directions:** All traffic should evacuate to the north on I-5. Enter I-5 at either Camino De Estrella/Camino De Los Mares interchange, or the Camino Las Ramblas interchange. The populations from neighborhoods south of Estrella Country Club should use the take I-5 via Camino De Los Mares. Proceed northbound on I-5 to the I-405 junction, then northbound on I-405 to Fairview Road off-ramp. Take Fairview Road southbound to Adams Avenue. At this point, evacuation traffic will be directed to the reception center on Orange Coast College campus.
District 5 **Dana Point:** Areas of Dana Point including the Capistrano Beach, which lie west of Pacific Coast Highway, north of the San Clemente city limits and south of Doheny State Beach Park. This district includes Doheny State Beach Park.	**Go to Orange Coast College** **Directions:** All traffic should evacuate to the north on Pacific Coast Highway. Proceed northbound on Pacific Coast Highway to Newport Boulevard. Take Newport Boulevard eastbound to Harbor Boulevard. Take Harbor Boulevard northbound to Adams Avenue. At this point, traffic will be directed to the relocation center on Orange Coast College Campus.
District 6 **Dana Point:** Areas of Dana Point north of Avenida Pico, west of the San Clemente city limits, east of Pacific Coast Highway and south of San Juan Creek and the San Juan Capistrano city limits.	**Go to Orange Coast College** **Directions:** The population west of I-5 should evacuate to the north on I-5 via Camino Capistrano and enter I-5 at the northbound on-ramp immediately north of the San Juan Capistrano south city limit. The population east of I-5 should enter I-5 via Camino Las Ramblas interchange. Proceed north on I-5 to the I-405 junction. Take I-405 to the Fairview Road turn-off. Turn south onto Fairview Road and proceed to Adams Avenue. At this point, evacuation traffic will be directed to the reception center on campus.

District / Jurisdiction	Evacuation Procedures
District 7 **San Juan Capistrano:** Areas of San Juan Capistrano which lie east and south of San Juan Creek.	**Go to Santa Ana High School** **Directions:** The population should evacuate to the north on I-5. Use the northbound on-ramps at Camino Los Ramblas, Valle Road, and Ortega Highway (S.R. 74) interchanges. Proceed northbound on I-5 to the Red Hill Avenue exit. Turn left (south) on Red Hill Avenue and continue to Moulton Parkway. Turn right (west) on Moulton Parkway and proceed to Main Street. Turn right (north) on Main Street and proceed to Walnut Street. Turn left (west) on Walnut Street and proceed to Santa Ana High School.
District 8 **San Juan Capistrano and unincorporated area of the EPZ:** Areas of San Juan Capistrano west and north of San Juan Creek, and the unincorporated area of Rancho Mission Viejo south of Ortega Highway.	**Go to Tustin High School** **Directions:** The population should evacuate to the north on I-5. Evacuating vehicles west of I-5 could exit the city via Camino Capistrano and enter the freeway at either Avery Parkway or Oso Parkway interchange. Vehicles east of I-5 should enter I-5 at either Ortega Highway or Oso Parkway interchanges. Evacuation traffic should proceed northbound on I-5 to the Red Hill Avenue interchange. Turn right on Red Hill Avenue and then left on Laguna Road. Proceed to Tustin High School on the right.
District 9 **Dana Point:** Areas of Dana Point south of Selva Road, west of San Juan Creek, and west of Pacific Coast Highway.	**Go to Edison High School** **Directions:** The population should evacuate north on Pacific Coast Highway to Magnolia Street, Huntington Beach. Turn right (north) on Magnolia Street to Edison High School.
District 10 **Dana Point:** Areas of Dana Point north of Selva Road, west of San Juan Creek and east of Pacific Coast Highway.	**Go to UC Irvine** **Directions:** The population should evacuate north on Street of the Golden Lantern, Niguel Road, and Crown Valley Parkway to Moulton Parkway. Take Moulton Parkway to I-405 northbound to the University Drive Interchange. Take University Drive westbound to Campus Drive. At this point, evacuation traffic will be directed to the location of the reception center on the U.C. Irvine Campus.

SECTION III
EMERGENCY PROCEDURES

SCHOOL ADMINISTRATOR

A. Responsibility

The School Administrator is responsible for overall command, coordination and management of the emergency, including development, implementation and review of strategic decisions and the action plan.

B. Procedure

When notified of an emergency at the San Onofre Nuclear Generating Station, the School Administrator shall:

1. Determine the emergency classification level (Unusual Event, Alert, Site Area Emergency or General Emergency).

2. When an Unusual Event is declared, no action is required of offsite agencies, private schools or childcare facilities.

3. When an Alert is declared, notify faculty and make preparations in case the situation escalates to a Site Area Emergency or General Emergency. Discuss the need to:

   a. Close school
   b. Prepare to have children Shelter-in-Place.
   c. Prepare to evacuate children to the appropriate reception center.

4. Appoint faculty to the following positions and brief them on their responsibilities:

   a. Communications Team Leader
   b. Assembly Team Leader
   c. Transportation Team Leader
   d. Parental Assistance Team Leader
   e. Security Team Leader

5. Determine the need for supplies, additional personnel, transportation, etc.

6. Monitor radio and television for the latest information on the emergency status.

7. Keep faculty informed of emergency conditions and response actions that are being considered.

8. When a Site Area Emergency or General Emergency is declared by the utility take action to close school and evacuate to a reception center, unless told to shelter in place.

9. When closing the school, take the following steps:

   a. Account for children and faculty
   b. Notify parents or guardians to pick up children
   c. Reunite children with parents/guardians upon their arrival.

10. If an evacuation is ordered by government authorities, or if the school undertakes an evacuation on its own, take the following steps:

    a. Refer to the "Nuclear Emergency Information" in the Customer Guide section of the Pacific Bell Telephone Book (Orange County South or San Diego County North) to determine the evacuation district where your school is located and the reception center where children can be taken.

    b. Notify parents or guardians that you are moving children to a safe location.

    c. Transport children to the designated reception center away from the nuclear power plant.

    d. If needed, request transportation from the School Coordinator in the Orange County Emergency Operations Center.

11. When authorities order the public to stay indoors, take the following steps:

    a. Close and lock windows and doors.
    b. Turn off air conditioning, vents, fans and furnace.
    c. Close fireplace dampers.
    d. Go to the basement or other underground area.
    e. Stay inside until authorities say it is safe.

12. When authorities advise it is safe to go outdoors, notify parents or guardians to pick up children.

13. Monitor the situation until termination.

SECTION III
EMERGENCY PROCEDURES

COMMUNICATIONS TEAM LEADER

A. Responsibility

The Communications Team Leader is responsible for establishing and maintaining communications with the County of Orange or other authority.

B. Procedure

When an Alert, Site Area Emergency, or General Emergency is declared at San Onofre Nuclear Generating Station, the Communications Team Leader shall:

1. Report to the School Administrator and obtain a briefing on the situation.
2. Document telephone calls from parents and others.
3. Refer to the "Nuclear Emergency Information" in the Customer Guide section of the Pacific Bell Telephone Book (Orange County South or San Diego County North) to determine the evacuation district where your school is located and the reception center where children can be taken.
4. If school is to be closed, notify parents where they can pick up their children.
5. Advise the School Coordinator at the Orange County Emergency Operations Center if school is evacuated, closed, or if transportation is needed.
6. Transfer calls from parents/guardians of children to Parent/Guardian Coordinator.
7. Answer and document incoming phone calls.
8. Monitor radio and television for emergency information that affects school operations.
9. Continually update the School Administrator on status of communications.
10. Turn in all documentation to the School Administrator when finished.

SECTION III
EMERGENCY PROCEDURES

ASSEMBLY TEAM LEADER

A. Responsibility

The Assembly Team Leader is responsible for establishing and maintaining an assembly area for children until parents pick them up or until the School Administrator orders an evacuation.

B. Procedure

When an Alert, Site Area Emergency, or General Emergency is declared at San Onofre Nuclear Generating Station, the Assembly Team Leader shall:

1. Report to the School Administrator and obtain a briefing on the situation.
2. Activate assembly area and brief faculty or student volunteers as necessary.
3. Confirm that classroom teachers have accounted for all children reporting to the Assembly Area.
4. Establish a system to keep track of all children that report to and leave the assembly area.
5. Maintain contact with the Parent Assistance Team and Transportation Team leader.
6. If school closure ordered, release children only when Transportation Team Leader has confirmed that a student's parents have arrived for pickup.
7. Continually update the School Administrator of assembly area activities including the status of the assembly area, requests for resources, unusual occurrences, and when all children have been picked up.
8. Turn in all documentation to the School Administrator when finished.

SECTION III
EMERGENCY PROCEDURES

TRANSPORTATION TEAM LEADER

A. Responsibility

The Transportation Team Leader is responsible for the management of traffic control operations related to the closure or evacuation of the school.

B. Procedure

When an Alert, Site Area Emergency, or General Emergency is declared at San Onofre Nuclear Generating Station, the Transportation Team Leader shall:

1. Report to the School Administrator and obtain a briefing on the situation.
2. If school is to be closed, control traffic flow so that parents picking up their children enter the school area in only one direction and leave in one direction.
3. Set up parking area for parents to meet with their children.
4. Direct parents to the predetermined "reunion area," where they will be met by the Parental Assistance Team.
5. Coordinate activities with the Parental Assistance Team.
6. If school is evacuating, arrange transportation for children and faculty to reception centers.
7. If needed, contact Orange County School Coordinator for transportation assistance.
8. Continually update the School Administrator of transportation activities including the status of traffic flow, requests for resources, and unusual occurrences.
9. Turn in all documentation to the School Administrator when finished.

SECTION III
EMERGENCY PROCEDURES

PARENTAL ASSISTANCE TEAM LEADER

A. Responsibility

The Parental Assistance Team Leader is responsible for reuniting children and parents at designated reunion area.

B. Procedure

When an Alert, Site Area Emergency, or General Emergency is declared at San Onofre Nuclear Generating Station, the Parental Assistance Team Leader shall:

1. Report to the School Administrator and obtain a briefing on the situation.
2. Establish a "Reunion Area" where parents can retrieve their children.
3. Set up a record keeping system of class rosters or locator cards and sign out sheets to document each student's release including date, time and signature of parent/guardian.
4. Assign messengers to bring children from the assembly area to the reunion area for release to their parents.
5. Verify children are released only to authorized parents or guardians in accordance with school policy.
6. When children report to reunion area, confirm that they recognize their parents or guardians and feel secure in their custody.
7. Ensure each student release is documented and file each release form in alphabetical order.
8. Continually update the School Administrator of parental assistance activities including progress of re-uniting children to parents, flow, requests for resources, and unusual occurrences.
9. Turn in all documentation to the School Administrator when finished.

SECTION III
EMERGENCY PROCEDURES

SECURITY TEAM LEADER

A. Responsibility

The Security Team Leader is responsible for securing and locking the school if closed or evacuated.

B. Procedure

When an Alert, Site Area Emergency, or General Emergency is declared at San Onofre Nuclear Generating Station, the Security Team Leader shall:

1. Report to the School Administrator and obtain a briefing on the situation.
2. Work in pairs.
3. Assist other team members with overall security responsibilities by patrolling school and directing people to the appropriate areas, i.e. parents to reunion area.
4. Secure the school by checking each classroom and other areas by turning off all lights, appliances etc. and locking all external gates, doors, entrances etc.
5. Assist other teams as needed when major responsibilities have been completed and approval has been obtained from the School Administrator.
6. Post signs that inform parents of where their children have been evacuated.
7. Continually update the School Administrator of security activities including requests for resources, and unusual occurrences.
8. Turn in all documentation to the School Administrator when finished.