

1/11/82

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)

TESTIMONY OF JOHN W. ELDRIDGE, JR.

Q.1. State your name and title.

A. I am John W. Eldridge, Jr., an Emergency Management Specialist for the Federal Emergency Management Agency (FEMA) assigned to FEMA Region IX, San Francisco, California.

Q.2. Do you have statements of professional qualifications?

A. Yes. My statement of professional qualifications is attached to this testimony.

Q.3. When did you first become involved in emergency planning for the Diablo Canyon Nuclear Power Plant?

A. I first became involved in offsite emergency response planning for nuclear power in California during October 1979 when the Nuclear Regulatory Commission (NRC) still chaired this process. Based on the President's December 1979 request that FEMA take the lead in offsite planning and review all existing plans, I assisted in the FEMA Region IX review of all plans including the San Luis Obispo County plan.

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Q.4. Please describe the nature of that involvement up to the present time, including the various activities you have engaged in, persons you have communicated with, responsibilities you have had.

A. In my capacity as an Emergency Management Specialist for FEMA Region IX, I have been responsible for the review and evaluation of California State and local planning for fixed nuclear facilities in general and in particular have acted as the FEMA project representative for this site. In this capacity I work closely with State and County Office of Emergency Services (OES) personnel and Pacific Gas and Electric Company (PG&E) representatives on the development and review of these plans as well as on the associated training drills and exercises. I also coordinate the activities of the Regional Assistance Committee (RAC) for their review and developmental assistance at this site.

Q.5. In the course of your review of offsite emergency planning at Diablo Canyon, what documents have you reviewed, particularly those which you view to be of primary importance to your evaluation?

A. The November 2, 1981, evaluation and status report was based on review of the following documents:

San Luis Obispo County Nuclear Power Plant Emergency Response Plan

(Parts I and II), dated May 1981.

State of California Nuclear Power Plant Emergency Response Plan

Revised March 1981

FEMA Region IX Evaluation Findings, Diablo Canyon Nuclear Power Plant

Offsite Emergency Response Plans Exercise, August 19, 1981.

In addition, I have familiarized myself with the plan that was current as of the December 17, 1981, public meeting. It should be noted that this plan will be given a complete review by FEMA after it is submitted.

Q.6. What tasks have you completed, and what remain to be completed?

(relates to last question)

A. Under the full 44 CFR 350 process FEMA has provided assistance in the development of the plans, observed an exercise, and held a public meeting. Remaining to be done is the application by the State for review and approval of the plan and the FEMA Region and Headquarters review process based on that request.

In accordance with the FEMA Memorandum of Understanding with NRC to provide assessments, findings, and determinations, we have provided a FEMA Region IX evaluation dated November 2, 1981. When the corrective actions discussed in that document are accomplished to the satisfaction of FEMA Region IX, we will notify NRC through FEMA Headquarters.

Q.7. What is the purpose of your testimony?

A. The purpose of this testimony is to address the status of offsite planning at the Diablo Canyon site at this point in time. State and County emergency plans are currently undergoing revision, modification, and upgrading based on FEMA/RAC comments as part of the informal review and assistance process.

Q.5. What is the basis for the evaluation of offsite emergency planning at Diablo Canyon which you are about to make?

A. The FEMA review is based on the provisions of the FEMA Proposed Rule, "Review and Approval of State and Local Radiological Emergency Plans and Preparedness," 44 CFR Part 350 and the "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Nuclear Power Plants," NUREG-0654/FEMA REP-1, Rev. 1.

Q.9. When would you anticipate that each of the plans and SOP's referred to above will be completed, approved by local authorities and submitted to the State?

A. At this time it appears that the County plan and SOP's will be completed and submitted to the State by mid-February 1982.

Q.10. Are you familiar with the document entitled, FEMA REGION IX EVALUATION AND STATUS REPORT ON STATE AND LOCAL EMERGENCY PREPAREDNESS AROUND THE DIABLO CANYON NUCLEAR POWER PLANT, dated November 2, 1981, which is attached to a FEMA memorandum of the same date from Francis S. Manda, Acting Regional Director for the Associate Director, State and Local Programs and Support Directorate, Attention: Robert T. Jaske, Acting Chief, Technological Hazards Division, with the same title, which in turn is attached to a memorandum, dated November 17, 1981, from Richard W. Krimm, Acting Assistant Associate Director, Office of Natural and Technological Hazards for Brian Grimes, Director, Division of Emergency Preparedness, U.S. Nuclear Regulatory Commission, on the subject, Interim Evaluation and Status Report -- Diablo Canyon?

A. Yes.

Q.11. What was your role in the preparation of the Evaluation and Status Report itself?

A. I wrote it based on my analysis of the existing information. During that analysis I did maintain contact with FEMA, State OES, County OES, and PG&E staff as is customary during the planning process.

Q.12. Are the statements and conclusions contained therein correct?

A. -- Yes.

Q.13. Has anything to your knowledge changed since that report was prepared which would alter the accuracy of any of the statements or conclusions contained therein?

A. No.

Q.14. Do you speak for FEMA today; does your opinion represent those of FEMA; are you authorized to speak for FEMA?

A. Yes.

Q.15. Is it correct then to say that your testimony today reflects all the information currently in your possession, including any such new information?

A. Yes.

Q.16. Does the November 2, 1981, FEMA REGION IX EVALUATION AND STATUS REPORT, together with the accompanying memoranda represent FEMA's findings and determinations as to whether State and local emergency plans are adequate and capable of being implemented, as provided for under the terms of the November, 1980, Memorandum of Understanding between NRC and FEMA.

A. Yes.

Q.17. In the November 2, 1981, FEMA report, 12 significant corrective actions are identified, which are related to 7 different planning objectives contained in Section 50.47(b) and NUREG-0654/FEMA REP-1, Rev. 1. Apart from these actions, are there any other deficiencies which FEMA has identified which would cause you to modify the conclusion stated therein, "When these corrective actions are accomplished to the satisfaction of FEMA Region IX, and the County plan is completed and submitted to the State for formal review, we believe with reasonable assurance that an adequate level of emergency preparedness will exist in San Luis Obispo County"?

A. No.

Q.18. What is meant in the report by the phrase "when...the County Plan is completed"?

A. It is my understanding that the County Supervisors will review the plan for conceptual approval and then submit it to the State OES for review in February 1982.

Q.20. Has FEMA discussed the 12 corrective actions identified in the November 2, 1981, report with the Applicant, the County, or the State in order to determine a schedule of actions which will satisfy FEMA?

A. Yes. A schedule for accomplishing these corrective actions was developed in coordination with State OES, County OES, and PG&E representatives and was submitted to FEMA National office on December 15, 1981.

Q.21. What means have been provided for verifying completion of these actions?

A. FEMA Region IX staff will verify the completion of each corrective action and when all have been completed will notify NRC through FEMA Headquarters.

Q.22. Referring to item IV.E of the November 2, 1981, report, which corresponds to planning standard II.E in NUREG-0654/FEMA REP-1, Rev. 1, on the subject of notification methods and procedures, four corrective actions are specified. The first states, "The technical specifications for the design and maintenance of the proposed warning system should be submitted for preliminary review and approval by FEMA." Have these technical specifications been received?

A. This material has been received by FEMA Region IX and is presently under review.

Q.23 Does FEMA anticipate that these technical specifications, if adequately implemented, will resolve the first corrective action identified?

A. Yes.

Q.24. The second corrective action under item IV.E states, "Pagers should be provided for alerting key County response personnel." How many and what type of pager are recommended? Who will take this corrective action?

A. This is a joint responsibility between the County and PG&E. The County determines what people require pagers and PG&E will furnish the equipment.

Q.25. What commitments have been received pertaining to the above matter, and are these satisfactory to FEMA?

A. This is a joint responsibility between the County and PG&E. The County determines what people require pagers and PG&E will furnish the equipment.

Q.26. The third corrective action under item IV.E states,

A reliable communications link consisting of both a two-way radio capability and a dedicated telephone line must be established between the EOC and the two Emergency Broadcast System stations. Communications lines to both radio station KVEC and radio station KSLY are required in order to provide full 24-hour coverage. Also, an agreement between the two radio stations and San Luis Obispo County regarding dissemination of emergency instructions to the public needs to be formulated.

What commitments have been received pertaining to these actions, and are these satisfactory to FEMA?

A. Based on mutual discussions it is my understanding that the County will obtain the agreements with the radio stations and PG&E will purchase and install the equipment referred to.

Q.27. The fourth corrective action under item IV.E states, "The public warning system must be completed and operational in accordance with the NRC established deadline." Of what does the public warning/notification system consist?

A. The public warning/notification system consists of the siren system (which includes the radio means to activate the system) and the link from the Emergency Operating Center to the Emergency Broadcast System stations KVEC and KSLY (this is a radio link).

Q.28. What actions must be completed on the warning/notification system?

A. The review of the technical specifications must be completed by FEMA Region IX and found satisfactory. Training by PG&E and County personnel on the use of the system should be scheduled and underway. The system must also be fully installed in accordance with the schedule dictated in the NRC rule.

Q.29. What commitments have been received pertaining to the completing and making operational of the system? Are these commitments satisfactory to FEMA?

A. The County and PG&E are addressing these actions as the schedule submitted by FEMA Region IX on December 15, 1981, shows. FEMA will verify these corrective actions when they are completed.

Q.30. Referring to item IV.F of the November 2, 1981, report, which corresponds to planning standard II.F in NUREG-0654/FEMA REP-1, Rev. 1, on the subject of emergency communications, the following corrective action was identified by FEMA:

The County radiological monitoring team members should be supplied with radios to establish a direct communications link to the County Unified Dose Assessment Center Supervisor.

Does each team member need a radio? What sort of radio is needed?

A. The agreement by the County and PG&E is that a hand-held radio on a County frequency will be provided to each County team member to enable them to talk directly to the County person in charge at the Unified Dose Assessment Center (UDAC). In addition, PG&E will add a repeater installation to that County frequency to provide adequate coverage of the plume exposure zone. FEMA will verify these corrective actions when they are completed.

Q.31. Referring to item IV.G of the November 2, 1981, report, which corresponds to planning standard II.G in NUREG-0654/FEMA REP-1, Rev. 1, on the subject of public education and information, the following corrective action was identified by FEMA:

The public information program required under this planning objective must be carried out to ensure that emergency response instructions are made available to both resident and transient populations.

Have you identified any deficiency in the public information program described in any of the plans pertaining to emergency planning at Diablo Canyon?

A. The County plan does commit to a public information program but the layouts and associated materials have not been completed at this point nor have the plan and layouts been reviewed by all parties involved.

Q.32. What specific actions, and by whom, are contemplated by this item "to ensure that emergency response instructions are made available to both resident and transient populations"?

A. The layouts for the public information program and the emergency instruction packet must be developed by the County, State, and PG&E in accordance with the provisions of the County plan. The public information material should be reviewed by FEMA for adequacy and checked for consistency with the County plan. When that review is completed and any modifications made, the County, State, and PG&E should proceed with the dissemination to the public of these materials.

Q.33. What schedule is anticipated pertaining to the above matter, and are these satisfactory to FEMA?

A. The schedule set forth in the FEMA Region IX memorandum of December 15, 1981, shows the goal for initial completion of this activity. In addition, an annual update and dissemination of this information is required by the criteria. FEMA will verify the adequacy of content and distribution when these actions are completed.

Q.34. Referring to item IV.H of the November 2, 1981, report, which corresponds to planning standard II.H in NUREG-0654/FEMA REP-1, Rev. 1, on the subject of emergency facilities and equipment, the following three corrective actions were identified:

1. The additional telephone capability needed for operations in the EOC should be established and those lines should be installed.
2. The EOC should have backup power source to ensure continuing operations under conditions of a commercial power failure.

3. Develop and install a system that will allow the cities involved in the plume exposure zone to be kept informed of the developing situation from the EOC.

Q.35. As to the first of these corrective actions, what specific actions and by whom, are contemplated?

A. The County will identify the number of additional telephone lines needed and PG&E will furnish them in accordance with the schedule in the FEMA Region IX memorandum of December 15, 1981.

Q.36. Is this satisfactory to FEMA?

A. Yes. FEMA will verify these corrective actions when they are completed.

Q.37. On the second of these corrective actions, what specific actions and by whom are contemplated?

A. The County will verify the nature of the service needed in the EOC. If lighting in the EOC is the only service that now needs emergency power, FEMA will accept a stockpile of portable battery powered fluorescent lights stored in the UDAC and properly maintained.

Q.38. Is this satisfactory to FEMA?

A. Yes. FEMA will verify when this corrective action has been completed.

Q.39. As the third of these corrective actions, what specific actions are contemplated and by whom?

A. It is my understanding that the County and PG&E have agreed to resolve this problem by installing a dedicated telephone line from the EOC to the cities involved.

Q.40. Is this satisfactory to FEMA?

A. Yes. FEMA will verify this corrective action when it has been completed.

Q.41. Referring to item IV.K of the November 2, 1981, report, which corresponds to planning standard II.K in NUREG-0654/FEMA REP-1, Rev. 1, on the subject of radiological exposure control, the following corrective action was identified:

Provisions must be made for the distribution of dosimeters, both self-reading and permanent record devices, to emergency workers. This equipment should be permanently located in the County.

What commitments have been received pertaining to this matter, and are these satisfactory to FEMA?

A. It is my present understanding that the County will provide dosimeters through the resources of the State OES and PG&E will provide thermoluminescent dosimeters (TLD's). The County will determine the number needed and select the most suitable storage sites. FEMA will verify this corrective action when it is completed.

Q.42. Referring to item IV.N of the November 2, 1981 report, which corresponds to planning standard II.N in NUREG-0654/FEMA REP-1, Rev. 1, on the subject of drills and exercises the following corrective action is identified:

The annual drill and training schedule of the County should be established and activities under that schedule begun.

What is the scope of the drill and training schedule for the County which is intended by this corrective action?

A. The criteria in NUREG-0654/FEMA REP-1, Rev. 1, provide minimum standards for exercises, drills, and training in Part II, Sections N and O. The planning standard for N states "Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected." The planning standard for O states "Radiological emergency response training is provided to those who may be called on to assist in an emergency." Additional detail is provided in the criteria elements under each of these headings.

Q.43. Has an annual drill and training schedule for the County been created?

A. It is under development by all parties involved and some drills have been held for the radiological assessment and monitoring personnel.

Q.44. What is the status of drills and training in the County at the present time?

A. An initial cycle of drills and training was completed prior to the August 19, 1981, exercise (see attached schedule). The second annual

cycle is under development by County OES, State OES, and PG&E and the date projected on the FEMA Region IX, December 15, 1981, schedule appears reasonable.

Q.45. When this schedule is implemented, will it be satisfactory to FEMA?

A. Yes. FEMA will verify when this corrective action is completed.

Q.46. What provisions are found in the County plan to ensure the ability of personnel to implement their assigned tasks?

A. The County plan must commit to a drill and training cycle. All public employees assigned tasks under the plan will be asked to participate in the annual training, drill, and exercise process established.

Q.47. With respect to item IV.O which corresponds to planning standard II.O in NUREG-0654/FEMA REP-1, Rev. 1, pertaining to radiological emergency response training, the same corrective action specified in item IV.N is cited, i.e., establishment of annual drill and training schedules for the County and commencement of activities thereunder.

What radiological emergency response training has already been provided to those who may be called upon to assist in an emergency in the vicinity of Diablo Canyon?

A. An initial cycle of drills and training was completed prior to the August 19, 1981, exercise (see attached schedule). The second annual cycle is under development by County OES, State OES, and PG&E and the date projected on the FEMA Region IX, December 15, 1981, schedule appears reasonable. Radiological training for the assessment and monitoring personnel was begun in December 1981 under the second cycle.

Q.48. What commitments or actions are contemplated in response to this corrective action, and are such measures satisfactory to FEMA?

A. All parties involved, State, County, and PG&E, are developing this schedule as indicated by the FEMA Region IX December 15, 1981, schedule. FEMA will verify when this corrective action is completed.

Q.49. Are there any other corrective actions pertaining to the County plan which are necessary for FEMA to conclude that there is reasonable assurance that an adequate level of emergency preparedness will exist in San Luis Obispo County?

A. No.

Q.50. What emergency planning is needed in Santa Barbara County as it pertains to an emergency at Diablo Canyon?

A. None. Santa Barbara County is in the ingestion pathway zone for Diablo Canyon. The State is responsible for ingestion pathway planning and the State representatives should coordinate with the County to assist in identifying potential agricultural receptors in that area. The result of this coordination should be reflected in the State plan.

Q.51. Have you reviewed the San Luis Obispo County Plan insofar as it deals with evacuation and the report entitled "Evacuation Times Assessment for the Diablo Canyon Nuclear Power Plant," by PRC Voorhees, dated September 1980?

A. Yes.

Q.52. Do these materials satisfy the guidelines found in Appendix 4 of NUREG-0654/FEMA REP-1, Rev. 17

A. Yes. I have concluded that the methods and approach described in Appendix 4 were addressed. With regard to the inherent technical accuracy of transportation formulas used and actual times obtained, an NRC commissioned study shown in NUREG/CR-1856 indicates that the technical accuracy of this evacuation study is considered to be quite good by an independent transportation authority.

Q.53. Was the evacuation time assessment adequately incorporated into the plan and SOP's so as to enable decision makers under various emergency conditions to make the appropriate judgment as to whether evacuation is the proper protective response, and if so, what sort of evacuation to implement?

A. Generally, yes. The evacuation time assessments are incorporated into the plan showing times for normal and heavy rain conditions. FEMA is asking that they add a column showing evacuation time under heavy fog. The placement and display of this information in the SOP's and the EOC is normally worked out and modified in the drill and exercise cycle.

Q.54. Have you also reviewed the capability of the County and various local organizations and resources to effectively implement an evacuation if required? What is your conclusion?

A. The exercise evaluation indicated that the capability to effectively implement an evacuation does exist.

Q.55. From an emergency planning perspective, what is the purpose of determining the estimated time for evacuation?

A. Protective action decisions are made on the basis of what course of action will provide the least possible exposure to radiation. The knowledge of evacuation times allows the decision makers to determine what course of action (shelter, evacuation, or some combination of the two) will be most effective in limiting exposure.

Q.56. A County corrective action plan was prepared to implement recommendations made in the course of critiquing the August 1981 full field exercise. This is referred to on page 2 of the November 2, 1981, FEMA Evaluation and Status Report. How are the actions and the schedule for completing them related to FEMA's overall findings of "reasonable assurance that an adequate level of emergency preparedness will exist?"

A. The County corrective action plan is based on recommendations resulting from the evaluation of the exercise. That evaluation included recommendations ranging in importance from significant to convenient or "nice to have" suggestions as is customary in a full evaluation of any exercise. The FEMA finding of November 2, 1981, took into account the County corrective action plan. Six of the significant corrective actions discussed in the FEMA Evaluation and Status Report are related to the corrective action list developed from the exercise evaluation.

Q.57. Have potential problems relating to emergency response workers experiencing role conflicts (e.g., mothers who are school bus drivers, etc.) in the event of an emergency been adequately addressed in the County emergency plans?

A. The criteria in NUREG-0654/FEMA REP-1, Rev. 1, do not require the plan to address role conflicts. However, FEMA's experience has shown that adequate training for emergency response does allow people in all walks of life to take reasonable responsible actions in an emergency situation.

Q.58. Does the County possess all the necessary equipment for monitoring and communications, apart from the equipment specified in the corrective actions noted in the November 2, 1981, evaluation and status report? If not, what additional equipment is needed to provide "reasonable assurance that an adequate level of emergency preparedness will exist?"

A. Yes.

Q.59. What provision in County emergency plans has been made for medical facilities for treatment of the general public who may be injured in a radiological emergency? In your opinion are these adequate?

A. Members of the general public who were injured and contaminated in a radiological emergency would be treated at the same medical facilities, French Hospital and Sierra Vista Hospital, as PG&E employees.

Q.60. In your opinion, is there adequate preparedness to evacuate or take other protective actions on behalf of persons who may be in Montana de Oro State Park, Avila Beach, and other downwind beach areas beyond Avila Beach?

A. Yes. State parks would be closed at the Alert level as a courtesy to area residents. State Parks representatives participated in the August 19, 1981, exercise and demonstrated a capability to take that action.

Q.61.. Are notification procedures adequate to provide warning for persons located in the back country of Montana de Oro State Park?

A. Yes. Four-wheel drive vehicles and a helicopter would be used to cover remote areas of Montana de Oro State Park. If needed, the Sheriff has the option of calling on the members of the mounted posse to assist in that area.

Q.62. The County plan provides that the EWS may be activated only in conjunction with a Site Area Emergency or a General Emergency classification. Is it a deficiency in the plan that it does not provide for use of the EWS at the Alert level?

A. No.

Q.63. Has adequate planning been done to provide for the warning and evacuation, if necessary, of the immobile population (e.g. nursing homes, hospitals)?

A. Yes. There are no hospitals in the plume exposure zone and persons with limited mobility will be asked to register with the County during the public information program. This registration will allow them to be addressed individually during the evacuation process. People who are not registered can contact the County phone assistance center for transportation during an evacuation.

Q.64. Could you briefly describe the nature of the emergency exercise conducted on August 19, 1981?

A. The August 19, 1981, exercise was designed to test the integrated capability of a major portion of the basic elements in the emergency plans and organizations. It included mobilization of State and local personnel to verify the capability to respond to an accident scenario. The scenario began with an Unusual Event and escalated to a General Emergency requiring protective action decisions and implementation by public officials. The exercise included staffing and operation of the Unified Dose Assessment Center, the Emergency Operating Center, the Emergency Operations Facility, a Reception and Care Center, and the Media Center. It also included field monitoring, a sample evacuation, closing of State Parks, and a hospital exercise with injured and contaminated patients.

Q.65. Could you briefly state the results of FEMA's evaluation of the emergency exercise?

A. Overall, each jurisdiction and agency demonstrated a very active, dynamic and highly enthusiastic level of play during the exercise. The participants demonstrated a good capability to handle the exercise events and challenges.

All of the concerns identified in this exercise evaluation are correctable through training, drills, plan revisions, or purchase of equipment. We believe that the necessary corrective actions will be taken as part of the ongoing emergency planning process in the County.

The evaluation conclusion is that due to the planning effort to date and the full participation by all participants, the exercise succeeded in its three basic goals. First, it demonstrated a capability to respond to a developing emergency situation, second, it served as an excellent training device, and third, it highlighted potential problem areas to be corrected.

Q.66. Could you describe briefly, with reference as appropriate, the significant deficiencies identified in offsite preparedness as a result of the exercise?

A. Six of the twelve significant corrective actions identified in the FEMA memorandum of November 2, 1981, are related to findings from the August 19, 1981, exercise evaluation. The six are as follows:

IV.F The County radiological monitoring team members should be supplied with radios to establish a direct communications link to the County Unified Dose Assessment Center Supervisor.

IV.H.1 The additional telephone capability needed for operations in the EOC should be established and those lines should be installed.

IV.H.3 Develop and install a system that will allow the cities involved in the plume exposure zone to be kept informed of the developing situation from the EOC.

IV.K Provisions must be made for the distribution of dosimeters, both self-reading and permanent record devices, to emergency workers. This equipment should be permanently located in the County.

IV.N The annual drill and training schedule for the County should be established and activities under that schedule begun.

IV.O The annual drill and training schedule for the County should be established and activities under that schedule begun.

DIABLO CANYON EXERCISE SCHEDULE

<u>ACTIVITY</u>	<u>DATE</u>	<u>LOCATION</u>
al Drill	June 8 - 9	French Hospital
ings (2)	June 15 - 18	SLO
iminary Assessment Training	week of June 22	SLO/San Jose
etop (key county people)	July 8	CSTI
toring/EOC Drill	July 9	Sheriff's/Field
ident Assessment Course/Drill	week of July 13	CSTI
ception/Care Facility Drill	July 14	Paso Robles Fairgrounds
rt/Warning Evaluation	July 21 - 22	SLO
ucuation/Control Drill	July 28	Sheriff's Office
ll-Scale EOC Drill	August 5	Sheriff's Office
LL FIELD EXERCISE	August 19	Sheriff's Office
ercise Critique	August 21	SLO
ate/FEMA Public Meeting	Sept. 10	SLO