

Response to Comment, Chapter 8, Emergency Management

Comment No.	Source	Comment	Disposition
8.1	NEI	Persistence of language in Chapter 8 that can still be construed to grant NRC regulatory oversight of hazardous material releases that have no impact on nuclear or radiological safety.	Agree. References to hazardous materials will be deleted except for the requirement to identify the quantities and location of hazardous materials.
8.2	NEI	Section 8.4.3.2.11(1) implies that fire, police, medical and other emergency personnel must have the same formal training as onsite personnel.	Disagree. However, minor changes will be made to 8.4.3.2.11 to clarify that special instructions and orientation tours are sufficient for fire, police, and medical personnel.
8.3	NEI	Section 8.4.3.2.14(3) implies that offsite response organizations must review all changes to the emergency plan, even those that are determined not to reduce the effectiveness of the plan.	Agree. Clarification will be added that only those changes that decrease the effectiveness of the plan needs to be reviewed by offsite organization's.
8.4	NEI	On numerous occasions SRP chapter 8 prescribes detailed descriptions of the facility and processes, accidents and mitigation of accidents that have already been described in other parts of the application. The licensee should only have to reference this material rather than include it in the Emergency plan.	Disagree. The Emergency plan is intended to be a self-contained document.
8.5	NEI	Concepts applicable only to nuclear reactor licenses persist in chapter 8, for example, the use of the terms SAR and FEMA. These terms should be deleted.	Agree. Will be deleted.

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8.6	NEI	NEI is concerned with numerous instances in which chapter 8 of the SRP requires an analysis or directs an action that is specified neither in the Rule nor in Regulatory Guide 3.67.	Disagree. The staff considers chapter 8 to be consistent with Regulatory Guide 3.67.
8.7	NEI	NEI has recommended several changes to Chapter 8 to draw attention to an applicant's commitment and suggested format changes.	Disagree. The staff considers the current structure of the SRP Chapter 8 to be appropriate. The NEI proposal would result in much more general applicant commitments, inconsistent with Regulatory Guide 3.67.
8.8	NRC staff	Section 8.3.1(6) should be modified to delete the last sentence, because the information is requested in another section of the SRP.	Agree. Will be modified.
8.9	NRC staff	Section 8.3.1(7) is not required in this section of the SRP and should be deleted.	Agree. Will be deleted.
8.10	NRC staff	"Emergency Management program" should be replaced with "Emergency Plan" to be consistent with part 70. Other changes were recommended to correct grammatical errors.	Agree. Will be replaced with Emergency Plan.
8.11	NRC staff	Section 8.4.3.2.3(4) should be modified to include how projected doses are calculated.	Agree. Will be modified.