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June 5, 2001

Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T-6 D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on Draft Addenda to NUREG-0654/FEMA-REP-1,
Rev 1
Criteria for Preparation and Evaluation of
Radiological Emergency Response Plans and Preparedness
in Support of Nuclear Power Plants
66FR22270, dated May 3, 2001

Dear Mr. Meyer:

Duke Energy offers the attached comments relative to the solicitation for public comments regarding the Draft Addenda to NUREG-0654/FEMA-REP-1, Rev 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," as published in the May 3, 2001 Federal Register.

Please address any questions to Tina Kuhr at (704) 382-3151.

Thank you for the opportunity to provide these comments.

Very truly yours,

M. S. Tuckman

M. S. Tuckman

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**Proposed Draft Addenda to NUREG-0654/FEMA-REP-1, Rev 1
Criteria for Preparation and Evaluation of Radiological
Emergency Response Plans and Preparedness in Support of Nuclear
Power Plants
Duke Comments**

It is recommended that Draft Addenda Item 16 [Page 61, Section II.J.9, referring to EPA-520/1-75-001] be revised to state the following:

EPA issued EPA-400-R-92-001, May 1992, and the Food and Drug Administration, Department of Health and Human Services, issued "Guidance on Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies; Availability," on August 13, 1998, (63 FR 43402), which supersedes these documents.

It is recommended that Draft Addenda Item 23 [Appendix 2, page 2-2, referring to NRC Reg Guide 1.23] be revised to correct the typographical error appearing in the word "citation".

U. S. Nuclear Regulatory Commission

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