



NUCLEAR ENERGY INSTITUTE

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(4)

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August 3, 2001

Chief, Rules and Directive Branch  
Division of Administrative Services  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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**SUBJECT:** Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants; Draft Addenda to NUREG - 0654/FEMA-REP-1, Revision 1 (66 Fed. Reg. 22270, ~~March~~ <sup>May</sup> 3, 2001)

The Nuclear Energy Institute (NEI) submits these comments on behalf of the nuclear industry. We have reviewed and support the recommended revisions to the Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants; Draft Addenda to NUREG - 0654/FEMA-REP-1, Revision 1 (66 Fed. Reg. 22270, ~~March~~ <sup>May</sup> 3, 2001).

NUREG - 0654/FEMA-REP-1 was published in 1980. The draft addenda revises outdated citations. NUREG - 0654/FEMA-REP-1 is used by licensees, states, and local governments for the development and implementation of radiological emergency plans for nuclear power generating stations. NRC and FEMA also use this NUREG to review licensee, state and local government radiological emergency response plans to determine the adequacy of the plans.

Nuclear utilities respond to a formal set of threshold conditions that require plant personnel to take specific actions with regard to notifying state and local governments and the public when certain off-normal indicators or events are recognized. Emergency classes are defined in 10 CFR Part 50. Levels of response and conditions leading to those responses are defined in NUREG - 0654/FEMA-REP-1, Appendix 1, October 1980. In 1992 the NRC endorsed industry developed NUMARC/NESP-007 "Methodology for Development of Emergency Action Levels," in Regulatory Guide 1.101 Revision 3 "Emergency Planning and Preparedness for Nuclear Reactors," August 1992. As utilities implemented the NUMARC/NESP-007

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areas of possible improvement were identified. In addition, the NRC staff provided suggestions for improvement based on their review of utility submittals.

An NEI task force incorporated implementation experiences and suggestions into NEI 99-01 Revision 4, the successor to NUMARC/NESP-007. NEI 99-01 Revision 4 was submitted for NRC endorsement in September 2000.

As we proceed forward to meet this country's energy needs with the advanced light water reactor designs or the new pebble bed reactor NEI stands ready to develop emergency action levels that appropriately support the public health and safety. At the same time it would be prudent to evaluate other emergency preparedness regulations and guidance in support of advanced reactor designs.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynnette Hendricks". The signature is written in a cursive, flowing style.

Lynnette Hendricks