



Vermont Department of Health
Office of the Commissioner

Agency of Human Services

January 31, 2002

Kathy Halvey Gibson, Chief
Emergency Preparedness and Healthy Physics Section
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Ms Gibson:

On November 29, 2001 Governor Howard Dean wrote to NRC Chairman Richard Meserve to express Vermont's interest in making potassium iodide (KI) available to people who live near Vermont Yankee Nuclear Power Station.

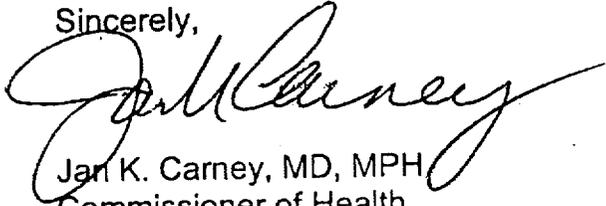
As requested by NRC, enclosed is Vermont's proposed plan overview for use of KI by the general public. Simply put, Vermont's plan will allow individuals who live or work in the six towns that comprise the Emergency Planning Zone to keep one dose per person of KI in their homes—after receiving information on risks and benefits, proper dosage, medical contraindications and the importance of following emergency directives such as evacuation or sheltering. This plan also includes the option of pre-distribution to hospitals, nursing homes, schools and licensed day cares that are located in the emergency planning zone. In addition, the state will keep the remainder as an emergency stockpile in the area.

With this plan, and based on current population estimates (also enclosed), I am formally requesting that the State of Vermont receive two full doses (i.e. 130mg dose x 2) of KI for 46,378 people, for a total of 92,756 individual doses.

I would appreciate it if you would contact me at 802-863-7280 regarding logistical arrangements and next steps. Specifically, I would like to know whether all doses will be in the 130mg size, or if some portion will be in the 65mg size. We request that KI tablets be supplied in individual dose packs, if at all possible. We would also like to know when to expect shipment.

Ship to address is Vermont Department of Health, 108 Cherry Street, Suite 201,
Burlington, VT 05402, ATTN: Dr. Jan K. Carney, MD.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan K. Carney". The signature is fluid and cursive, with the first name "Jan" being particularly prominent.

Jan K. Carney, MD, MPH
Commissioner of Health

cc: Howard Dean, MD, Governor
Richard Meserve, Chairman, Nuclear Regulatory Commission
Daniel C. McElhinney, Regional Assistance Committee Chair, FEMA,
Region I

Enc: State of Vermont Plan Overview: Distribution of Potassium Iodide to the
General Public
Potassium Iodide Population Estimate

Potassium Iodide (KI) Population Estimate

	A	B	C	D	E	F	G	H
1	CATEGORY Estimates	Brattleboro	Dummerston	Guilford	Halifax	Vernon	Marlboro*	TOTAL
2	RESIDENT POPULATION (2000)	12,005	1,915	2,046	782	2,141	978	19,867
3								
4	TRANSIENT POPULATION	10,218	690	418	120	874	257	12,576
5	NON-EPZ WORKFORCE	6,003	26	20	3	471	36	6,559
6								
7	VISITORS	4,216	664	398	117	403	221	6,018
8	Hotel, Motel, B&B Population**	1,063	25	0	10	0	25	1,123
9	Campgrounds	152	258	0	0	0	0	410
10	Seasonal Residents**	1,201	192	205	78	214	98	1,987
11	Non-Overnight Visitors***	1,801	189	193	29	189	98	2,499
12								
13	CHILDREN NOT AT HOME	4,178	296	281	97	269	415	5,536
14	Public Schools	2,716	215	281	97	242	90	3,641
15	Private Schools & Child Cares	1,367	39	0	0	27	325	1,758
16	Summer Camps	95	42	0	0	0	0	137
17								
18	INSTITUTIONAL CONTINGENCY****	479	0	0	190	0	0	669
19								
20								
21	TOTALS							
22		26,880	2,901	2,745	1,189	3,284	1,650	38,648
23	OVERALL CONTINGENCY							
24		5,376	580	549	238	657	330	7,730
25	POPULATION TOTALS							
26		32,256	3,481	3,294	1,427	3,941	1,980	46,378
27	TABLETS INDIVIDUALLY WRAPPED IN FOIL NEEDED							
28								92,756
29	*Marlboro is geographically in the ten mile EPZ and is currently considering participation in the program.							
30	**Seasonal residents is estimated at a peak of ten percent .							
31	** Hotel rooms were estimated. (For example Brattleboro was 425 rooms at 2.5 people at peak times.)							
32	***Day time visitors = Resident population times a factor(0.15 for Brattleboro)							
33	****Precautionary Transfer plans for the institutions may have residents and staff separated from their KI supply							
34	(Brattleboro has 958 institution beds times 0.5).							

State of Vermont Plan Overview
Distribution of Potassium Iodide (KI) to the General Public

I. AUTHORITY:

Title 18 of Vermont Statutes Annotated provides the Commissioner of Health with the authority necessary to recommend the ingestion of Potassium Iodide (KI) in the event of a public health emergency.

II. RESPONSIBILITY:

It will be the responsibility of the State of Vermont to carry out the provisions of this plan so that every citizen located within the 10-mile Emergency Planning Zone of the Vermont Yankee Nuclear Power Reactor has the opportunity to receive KI prior to a radiological event. It is also the responsibility of the State to maintain adequate stockpiles of KI in close proximity to the EPZ for use in the event of a radiological emergency by those persons who either do not have their own KI or who can not access their own KI.

III. DECISION CRITERIA:

The State of Vermont Health Services Coordinator (Commissioner of Health) will follow the U.S. Food & Drug recommended dosage as shown below. As a practical matter, it may not be possible to assess the risk of thyroid exposure from inhaled radioiodines at the time of an emergency. Lacking specific predicted thyroid exposure, the Health Services Coordinator may recommend use of KI to persons known to have exposure to radioiodines at an unknown concentration.

IV. ELIGIBILITY CRITERIA:

Risk Group	KI Dose (Milligrams)	# of 130 mg Tablets	# of 65 mg Tablets
18 to 40 years	130	1	2
Pregnant or lactating women, Also over 3 through 18 years	65	½	1
Over 1 month through 3 years	32	¼	½
Birth through 1 month	16	1/8	¼

V. DISTRIBUTION METHOD:

Potassium Iodide will be distributed in the following manner:

1. People who live or work within the EPZ will be offered the opportunity to obtain their own personal dosage of KI. This will be accomplished through outreach and education efforts by the Department of Health, in concert with locally stationed public health nurses.
2. Within, and just outside of, the EPZ, Offsite Response Organizations (ORO's) will be utilized to store sufficient quantities of KI. In the event of a radiological emergency, these ORO's will be utilized for mass distribution of KI. ORO's will be sited in local fire departments, police barracks and other centrally located and easily secured structures.
3. Special population segments will be provided with their own specific distribution systems located within, or near, their respective setting(s). Such populations as those served in hospitals, nursing homes, schools, child and/or adult care facilities will be provided KI in this manner.

VI. PROCEDURE FOR DETERMINING THE QUANTITY OF KI NEEDED:

The State of Vermont has utilized the following procedure to determine the number of doses needed.

- a. Total number of residents within the EPZ; plus
- b. Estimated transient population; plus
- c. The number of school-age children; plus
- d. A factor of 2 (allowable Federal request)

VII. PROCEDURE FOR ENSURING THAT THE SUPPLY IS ADEQUATE FOR THE POPULATION WITHIN THE EPZ.

The procedure for determining the quantity of KI (above) will involve the use of the latest EPZ planning and population numbers. These numbers will be obtained from the Vermont Department of Emergency Management and verified by the towns within the EPZ. Estimates of the total population, resident and transient, is attached. The State of Vermont is currently requesting two doses for 46,378 individuals for a total of 92,756 individual doses.

VIII. OFFSITE RESPONSE ORGANIZATION PROCEDURES:

Standard pharmacological procedures will be developed by the State of Vermont for the purpose of ensuring the safe and proper storage, monitoring, safeguarding, dispensation and disposal of KI stocks sufficient to meet the anticipated need. Additionally, the procedures will be put in place for tracking of who received KI, when, and in what quantity. Additionally, the ORO will maintain necessary waivers from liability as determined by the Vermont Department of Health and the Vermont Attorney General's Office.

These procedures will ensure that KI supplies are within the expiration date indicated on the KI containers and that there is appropriate documentation extending the shelf life, where applicable.

IX. METHOD OF ALERTING AND NOTIFYING THE GENERAL PUBLIC OF THE DECISION TO RECOMMEND THE INGESTION OF KI:

The Vermont Alert and Notification system currently used to alert and notify the public of a radiological emergency within the EPZ will be utilized for the purpose of KI ingestion. This system includes, but is not limited to, the use of sirens, radio & television announcements and local emergency response networks.

New Emergency Alert System messages specific to KI ingestion will be developed.

New Health Advisories will be developed for the same purpose.

New public education materials to include brochures, calendars, newspaper inserts, telephone book inserts, as well as other outreach venues, will be developed and distributed.

These materials will, at a minimum, include the following information:

- groups and location of people advised to take KI
- reason for taking KI
- Dosage and time period within which KI should be taken
- Where KI can be obtained and under what circumstances it can be obtained
- Possible side effects and appropriate warnings
- Other information as deemed appropriate.

HOWARD DEAN, M.D.
Governor



State of Vermont
OFFICE OF THE GOVERNOR
Montpelier 05609

Tel.: (802) 828-3333
Fax: (802) 828-3339
TDD: (802) 828-3345

November 29, 2001

Richard Meserve, Chairman
Nuclear Regulatory Commission
OWFN
11555 Rockville Pike
Rockville, Maryland 20852

Dear Mr. Meserve:

I am writing to express Vermont's interest in making potassium iodide (KI) available in a safe and effective way to people who reside in the zone surrounding Vermont Yankee. I understand that following the events of September 11 the Nuclear Regulatory Commission, Food and Drug Administration, and Federal Emergency Management Agency have all been working collaboratively to update recommendations regarding KI. Vermont has already begun working on a plan to make KI available to residents who wish to have it. This plan would be incorporated as adjunct to our overall radiological emergency response plan.

We believe it is critical to emphasize that the use of KI is not a substitute for evacuation. It is simply one more protective measure we can provide in addition to evacuating, sheltering, and controlling contaminated food.

I envision that Vermont's final plan will allow individuals to keep KI in their homes - after receiving full information on the risks and benefits, proper dosage, medical contraindications, and the importance of following emergency preparedness and response directives. Special education and appropriate follow-up would be provided to pregnant women and infants. The plan would also provide for emergency distribution of KI at our reception center.

I hereby request your assistance in implementing Vermont's plan as it is finalized and incorporated as an adjunct to the Vermont Radiological Emergency Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard Dean".

Howard Dean, M.D.
Governor