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STATE OF WASHINGTON
DEPARTMENT OF HEALTH
DIVISION OF RADIATION PROTECTION

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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DOCKET NUMBER
~~PETITION FILE~~ PRM 50-79
(67FR 66588)

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Dear Secretary:

We would like to submit the following comments regarding the Petition for Rulemaking, PRM-50-79, for the Washington State Department of Health.

First and foremost, we believe that the petition is incorrectly directed to the US Nuclear Regulatory Commission (NRC). The correct agency to address this issue and all others regarding off-site emergency preparedness for commercial nuclear power facilities is the Federal Emergency Management Agency (FEMA). We also have several other comments regarding specific elements in the petition.

Specific Federally-Mandated Requirements for Daycare Centers and Nursery Schools

It is our understanding that there are federally mandated requirements for daycare centers and nursery schools related to emergency preparedness within the REP program. While not specifically addressed in the language of NUREG-0654 FEMA-REP-1 (NUREG-0654), these facilities are considered to house "special populations" (see Appendix 4 item II.C of NUREG-0654). As such, it is the responsibility of state and local governments to identify and ensure that these facilities are adequately prepared to protect these children.

Lack of Instruction to Directors of Daycares and Nursery Schools

As a resident and/or business that exists within the 10-mile Emergency Planning Zone (EPZ) of a commercial nuclear facility, these facilities are provided annually with specific information on what to do in the event of an emergency at the nuclear facility (NUREG-0654, II.G.1 and 2) by the licensee and/or the state and local governments. The petitioners' statements regarding the daycare and nursery school directors in his area not believing that they have been given adequate information or training to handle an evacuation of children in their care during a radiological emergency; not having copies of radiological emergency evacuation plans for localities; not knowing where children would or should be taken in the event of an emergency evacuation in response to a radiological incident; and making any assumptions regarding the mode and means of transportation of the children in their care only serve to indicate a failure of the state and local agencies in this region to implement the requirements of NUREG-0654 and of the FEMA region to ensure that these requirements are being met (NUREG-0654, II.J.10.a,b,c,d,g).

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It is the responsibility of the center operator and local emergency management to address these issues, not the NRC. FEMA should then perform an assessment to verify that these requirements are being met. Properly implemented planning for these centers would designate a specific relocation center for these children to be taken to and how they are to get there. The parents would know where and how their children might be picked up at the relocation center after it has been verified that the children had not been contaminated. Note, if an area were being evacuated due to an emergency at the nuclear facility, the parents of these children would not be permitted to enter the evacuation area to retrieve their children from the daycare or nursery school.

Potassium Iodide


The stockpiling and administering of Potassium Iodide (KI) to children in a daycare or nursery school by center staff is, in our opinion, not advisable. Children at this age are most susceptible to both exposure to radioactive iodine and the misadministration of KI. Currently there are two sizes of KI tablets available, one intended for use by adults only and the other, one-half the size of the adult tablet, for children ages three to eighteen. Infant and toddler dosages are only one-eighth to one-quarter of the adult dose. To administer this dose to an infant or toddler requires the caregiver to dissolve the table in a liquid and then administer a small portion of the liquid to the child. Daycare workers are not trained as nurses or as pharmacists and should not be mixing and measuring out doses of KI to be administered to infants and children. There may also be other liabilities associated with the administration of any medicine to children by anyone other than the parent or a licensed medical practitioner. The emphasis should be on the prompt evacuation of all of the children prior to any exposure.

Conclusion

We urge the NRC to reject this petition and we recommend that the issues brought up in this petition be forwarded to the Federal Emergency Management Agency for their attention. We do not believe any rulemaking is needed in order to address the petitioners' concerns. Current guidance contained in NUREG-0654, FEMA-REP-1 is adequate to ensure the safety of the children the petitioners are concerned with provided that the intent of the guidance is adhered to by the state and local governments and enforced by FEMA.

Thank you for the opportunity to comment on this issue.

Sincerely,


for Gary L. Robertson
Division Director

CC: Bob Nichols, State Liaison Officer