

**PRM-50-85
(72FR37470)**

From: "Gary Lima" <glima@tnema.org>
To: <SECY@nrc.gov>
Date: Fri, Sep 21, 2007 4:50 PM
Subject: Comments Reference PRM-50-85 Petition for Rule Making - Regarding Pick-Up Centers Increased Minimum Distance

To SECY:

The State of Tennessee, Tennessee Emergency Management Agency (TEMA), FNF Program has reviewed the summary discussing the extension of the distance to pick-up points (paired schools in Tennessee) outside the 10-Mile EPZ, from 5 - 10 additional miles, for relocation of children during Site Area Emergency.

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After discussing this with Alabama and within TEMA, we believe this to be a logistical requirement of unwarranted expense. Just a few years ago we were asked by NRC to assess the proposed change to the EPZ; going from 10 miles to 5 miles due to viable assessment of actual need in terms of EPZ (based on studies.) Tennessee and many other states argued maintaining the present 10 EPZ as a matter of practicality and increased "comfort zone" for our public, i.e. knowledge that 10 miles is better and inculcated in the average mind set; at least conservatively twice the new recommended radius from a nuclear plant via EPZ.

That being the case, there is no need to extend the distance from 10 miles for relocation of children, an additional 5 to 10 miles, especially knowing that moving them before an off-site release occurs prevents exposure or contamination. Therefore, we do not consider it practical or wise to extend the range. Those school buses are needed for the evacuation during the General Emergency and the greater the distance of travel for school children (especially during bad weather), the greater the chances for an accident with a bus.

Tennessee respectfully declines concurrence with the petition for change.

Regards,

Gary N. Lima

FNF Planner Supervisor

TEMA

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SECY-02

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