



Pennsylvania DEP

Bureau of Radiation Protection

Randolph Easton

Emergency Response Section



Comments on Draft Preliminary Rule Making

Emergency Preparedness
Note: Comments refer to
Docket NRC-2008-0122



Emergency Facilities, Equipment and Communications – 50.47

- 50.47 – Emergency Plans – (b)(8) –
Modify Section to Include:
 - Offsite Incident Command Post
 - Offsite Staging Area
 - Reliable Communications
- Also Modify (d)(4) in Same Section



Incident Command System – Appendix E

- Appendix E to Part 50 - IV. Content of Emergency Plans – A. Organization
 - Add (10) – Description of Onsite Response Capabilities Interface With ICS.



Emergency Equipment and Communications – Appendix E

- Appendix E to Part 50 – IV. Content of Emergency Plans – C. Activation of Emergency Organization – Add (3) --
 - Offsite Incident Command Post
 - Offsite Staging Area
 - Reliable Communications



Emergency Facilities, Equipment and Communications – Appendix E

- Appendix E to Part 50 – IV. Content of Emergency Plans – E. Emergency Facilities and Equipment
 - (9)(c) – Add ‘the incident command post and staging area’.
 - Add (10) – Incident Command Post Location Identification and Procedures
 - Add (11) – Staging Area Location Identification and Procedures



Incident Command System – Training – Appendix E

- Appendix E to Part 50 – IV. Content of Emergency Plans – F. Training
 - Add (1)(b)(x) – Senior ERO Staff Receive Advanced NIMS Course Training, Such as ICS-300 and ICS-400



Conduct of Exercises – Requirement to Reach GE – Appendix E

- Appendix E to Part 50 – IV. Content of Emergency Plans – F. Training
 - Modify (2)(j) to read: “Each biennial exercise should proceed to the General Emergency level.
 - Replace ‘shall’ with ‘should’.
 - Flexibility in accident scenario development
 - Allows onsite staff to succeed, reduces negative training
 - Avoids pre-conditioning



Hostile Action Events – Appendix E

- Appendix E to Part 50 – IV. Content of Emergency Plans – I. Onsite Protective Actions During Hostile Action Events
 - Modify to read: “... to protect onsite personnel and those offsite personnel that respond onsite...”



Conclusion

- BRP Appreciates Opportunity to Provide Input on this Important Issue.
- Questions and Comments:
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