Add: 12 mothers m. sanders DAR: ADM

TENNESSEE VALLEY AUTHORIES & PROCEDURES ER

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

MAR 21 1988

'88 MAR 24 P2:36

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

December 5, 1987 53 FR 45866

Gentlemen:

NUREG 0654/FEMA-REP-1, REVISION 1, SUPPLEMENT 1, CRITERIA FOR PREPARATION AND EVALUATION OF RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS IN SUPPORT OF NUCLEAR POWER PLANTS

The Tennessee Valley Authority (TVA) has reviewed and is pleased to provide comments on revision 1, supplement 1 to NUREG O654/FEMA-REP-1 noticed in the December 2, 1987 Federal Register (52 FR 45344-45346) regarding the preparation and evaluation of radiological emergency response plans.

This supplement provides modifications to criteria that will be used to evaluate utility developed compensatory measures resulting from the situations in which State and local officials decline to participate in the planning process for radiological accidents.

This supplement should be effective as a joint NRC and FEMA interim-use document with the understanding that it is to be used after the utility has made a sustained effort to obtain the cooperation of the necessary governments and, as the last measure to be used, to compensate for the lack of cooperation.

It needs to be noted that there are several logistic details concerning the interface between the offsite emergency response organization (as defined in the supplement) that will need to be addressed within the governmental structure that exists at the time this document would be implemented, which cannot be generically defined ahead of time.

We appreciate the opportunity for comment.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

, A

R. Gridley, Director Nuclear Licensing and

Regulatory Affairs

cc: See page 2

cc: Mr. K. P. Barr, Actiny Assistant Director for Inspection Programs TVA Projects Division U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

> Mr. David Meyer, Chief Rules and Procedures Branch Mail Stop 4000 MNBB U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> Mr. G. G. Zech, Assistant Director for Projects TVA Projects Division U.S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

Bellefonte Resident Inspector Bellefonte Nuclear Plant P.O. Box 2000 Hollywood, Alabama 35752

Browns Ferry Resident Inspector Browns Ferry Nuclear Plant Route 12, P.O. Box 637 Athens, Alabama 35611

Sequoyah Resident Inspector Sequoyah Nuclear Plant 2600 Igou Ferry Road Soddy Daisy, Tennessee 37379

Watts Bar Resident Inspector Watts Bar Nuclear Plant P.O. Box 700 Spring City, Tennessee 37381