

**PR 50 and 52
(74FR23253)**

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PUBLIC SUBMISSION

As of: July 01, 2009 Received: June 23, 2009 Status: Pending_Post Tracking No. 809d69ab Comments Due: August 03, 2009 Submission Type: Web

Docket: NRC-2008-0122
Emergency Preparedness

DOCKETED
USNRC

Comment On: NRC-2008-0122-0010
Enhancements to Emergency Preparedness Regulations

July 1, 2009 (4:25pm)

Document: NRC-2008-0122-DRAFT-0040
Comment on FR Doc # N/A

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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Government Agency Type: Federal

Government Agency: NRC

General Comment

Regarding the proposals related to Evacuation Time Estimates (ETE); I question whether this change to the NRC regulations is needed. I question what is driving this change to the regulations.

To the best of my knowledge (26 years with the NRC, at least half as an Emergency Preparedness inspector), there have been no inspection findings indicating problems associated with ETES.

Some states/municipalities use ETES extensively and well, some make little use of them unless inclement weather is postulated. There are various uncertainties associated with generating an ETE, and various methodologies for calculating an ETE Report. It is not clear to me which methodology has been shown to be best (has one?); specifying a methodology to be utilized appears to be heavy-handed.

At the Lisle public meeting, I was told that "staged evacuations" may be more effective, and a good ETE is necessary. I was also told that a small percentage of nuclear plants had unimpressive and old (up to thirty years) old ETE Reports.

I also question the need for such studies to be done and submitted to the NRC on such a relatively short timeframe (180 days), and whether the NRC has the expertise and resources to review and approve the expected flurry of submittals.

Template = SELV-067

DS10

Assuming this to be correct, the NRC should focus on those plants seen as having deficient ETE Reports (as above) rather than tasking the entire industry with generating new ETE Reports using a specified methodology and timeframe. Some plants have criteria for when a new ETE Report is required, such as well Emergency Planning Zone (EPZ) population changes by 15%.

Suggestion: Scrap the proposed change, require a new ETE when EPZ population changes by 15% or when an ETE Report is over twenty (20) years old, using any current methodology. Discuss performing a new ETE Report with plants whose current ETE Report is seen as deficient or outdated. If necessary, make such discussions via public meetings.

Rulemaking Comments

From: Gallagher, Carol
Sent: Wednesday, July 01, 2009 4:14 PM
To: Rulemaking Comments
Subject: Comment on Emergency Preparedness proposed rule
Attachments: NRC-2008-0122-DRAFT-0040.pdf

Attached for docketing is a comment from James Foster on the above noted proposed rule that I received via the regulations.gov website on June 23, 2009.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.76]) by TWMS01.nrc.gov
([148.184.200.145]) with mapi; Wed, 1 Jul 2009 10:56:43 -0400
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Content-Transfer-Encoding: binary
From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
Date: Wed, 1 Jul 2009 10:56:42 -0400
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Thread-Topic: Comments on Emergency Preparedness proposed rule
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MIME-Version: 1.0