

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

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# PUBLIC SUBMISSION

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Emergency Preparedness

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

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Comment on FR Doc # N/A

DOCKETED  
USNRC

July 1, 2009 (4:25pm)

OFFICE OF SECRETARY  
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ADJUDICATIONS STAFF

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## Submitter Information

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**Submitter's Representative:** Alan Nelson

**Organization:** NEI Task Force

**Government Agency Type:** Federal

**Government Agency:** NRC

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## General Comment

Regarding the proposed methodology for Evacuation Estimate Studies: The guidance goes to great lengths to describe the variables which need to be incorporated. Some of these variables are so detailed and/or obscure that no data is likely to be available to support their use. What will be done if information regarding these variables is unobtainable?

Will Scandia labs (who conducted the study) provide software package to support their recommended methodology (including how to handle the above variables)?

In the proposed rule, what would allow half of the licensees to not be held responsible for the "initial update" (SECY-09-0007, Page 102) which is to follow the decentennial census?

Inclusion of "shadow evacuation" contradicts NUREG-6864, Volume 1, Identification and Analysis of Factors Affecting Emergency Evacuation." Should this guidance be followed?

Template = SECY-067

DS 10

## Rulemaking Comments

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**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-0041.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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To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>  
Date: Wed, 1 Jul 2009 10:56:42 -0400  
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