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Submitter Information

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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.

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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 Discuss performing a new ETE Report with plants whose current ETE Report is seen as deficient or outdated.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.

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 decennial census?

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