



NUCLEAR ENERGY INSTITUTE

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September 28, 2009

Mr. Christopher G. Miller
Deputy Director for Emergency Preparedness
Division of Preparedness and Response
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Nuclear Energy Institute Comments on Draft NUREG–0654, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants: Criteria for Protective Action Recommendations for Severe Accidents,” March 6, 2009 (ML090820416)

Project Number: 689

Dear Mr. Miller:

The Nuclear Energy Institute (NEI)¹, on behalf of the nuclear energy industry, is pleased to comment on the U.S. Nuclear Regulatory Commission’s (NRC) Division of Nuclear Safety and Incident Response Draft NUREG–0654, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants: Criteria for Protective Action Recommendation for Severe Accidents,” issued 3/6/09. This proposed revision to the NRC guidance incorporates current concepts in protective action strategies to date and presents guidance on the development of protective action recommendations and decisions.

The industry PAR task force and NEI have reviewed the draft NUREG and have developed detailed comments which are provided in the enclosure to this letter. In addition to the detailed comments, a

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry. NEI’s members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear material licensees, and other organizations and individuals involved in the nuclear energy industry.

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few general comments are provided. NEI and industry would be pleased to meet with the NRC to further discuss the comments provided in the enclosure.

The following are few issues that have been identified during the draft NUREG:

Though intended to simplify the protective action development process, the proposed process appears to add significant complexities to the process, which may require significant clarification and training in order to effectively and properly implement.

The inclusion of Large Early Release considerations appears inconsistent with the initial findings of the State Of The Art Reactor Consequence Analysis provided by the NRC.

The proposed guidance contains a number of new technical concepts (such as the delineation of high population EPZ's) that require clarification in order to assess their soundness.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Martin Hug". The signature is written in a cursive style with a large, stylized "H" and "g".

Martin T. Hug

Attachment

c: Mr. Randy L. Sullivan, NRC
NRC Document Control Desk