

Docket ID NRC-2008-0122

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USNRC

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Federal Register/Vol. 74, No. 94, Proposed Rules

General Comment: The purpose of these rule changes is "Enhancement to Emergency Preparedness Regulations" that is needed due to changes required by Presidential Directives that resulted after the Terrorist Attacks on 9/11/01. The requirement for Hostile Action Based exercises will now require ORO responders to support on-site personnel responding to events when on-site resources are not adequate. Because of the same terrorist attack, many changes have occurred to ORO in incident response in the last seven (7) years. National Incident Management System (NIMS) and Incident Command System (ICS) were required for all State and Local responders, and the Dept. of Homeland Security thru funding control has made the Homeland Security Exercise Evaluation Program the model that all responders, planners, and exercise officers are being trained for in exercise programs. Although, NIMS, ICS, and HSEEP is stated as the purpose and intent of the rule changes, very little of the rule is being altered to comply. On page 23268, section IV. 1. Second Paragraph, last line states that the NRC is looking for comments to issue regulations requiring licensees to use ICS. This is the place to get the comments and make the rule.

Page 23258-23259 II. A. 4: Licensees should not be required to "ensure" OROs plans personnel available to carry out plans. Plans can be reviewed by licensees as they are with FEMA REP staff. ORO use numerous sources to provide things like route alerting and traffic. Licensees should review the plans for adequate planning to provide responders for hostile actions incidents.

Page 23264 II. B. 4: ETE updating of 10% of the population change should apply to population of EPZs greater than 50,000 people. Rural plants that have small population would not have little impact on routes.

Page 23268 IV. 1: Licenses are already required under existing OSHA regulations to use ICS and HSPD-5 to develop ICS for private sector agencies. The NRC needs to put the requirement in this change.

Rulemaking Comments

From: Gallagher, Carol
Sent: Friday, October 09, 2009 3:19 PM
To: Rulemaking Comments
Subject: FW: Docket ID NRC-2008-0122
Attachments: Comments on Fed Register.docx

Van,

Attached for docketing is a comment on the proposed rule "Enhancements to Emergency Preparedness Regulations."

Thanks,
Carol

-----Original Message-----

From: Frank Price [mailto:frankp@ema.alabama.gov]
Sent: Friday, October 09, 2009 2:44 PM
To: Gallagher, Carol
Cc: LaTonya Stephens; Marieke B. Fendley
Subject: Docket ID NRC-2008-0122

<<Comments on Fed Register.docx>> Attached is comments for Docket ID NRC-2008-0022.

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by TWMS01.nrc.gov
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From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
Date: Fri, 9 Oct 2009 15:19:25 -0400
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