

5/18/09 74 FR 23219  
15

# PUBLIC SUBMISSION

**As of:** October 20, 2009  
**Received:** October 19, 2009  
**Status:** Pending\_Post  
**Tracking No.** 80a45025  
**Comments Due:** October 19, 2009  
**Submission Type:** Web

**Docket:** NRC-2008-0122  
Emergency Preparedness

**Comment On:** NRC-2008-0122-0013  
NUREG/CR-XXXX, Criteria for Development of Evacuation Time Estimate Studies, Draft Report for Comment

**Document:** NRC-2008-0122-DRAFT-0088  
Comment on FR Doc # E9-11037

## Submitter Information

RECEIVED

2009 OCT 20 AM 11:43

RULES AND DIRECTIVES  
EPANCOH  
10/19/09

**Name:** Atri Sen  
**Address:**  
8550 United Plaza Blvd.  
Ste 501  
Baton Rouge, LA, 70809  
**Organization:** IEM, Inc

## General Comment

1. The prescribed goal of this guidance is a more complete and comprehensive ETE study that incorporates all possible existing ORO and community plans, including detailed 'busing' plans for transit dependent population. The prescriptive nature of this guidance document will encourage "unrealistic" or "unverifiable" assumptions in absence of accurate/verifiable data (e.g., the percent of permanent resident of EPZ assumed to be at parks, shopping & other locations to discount them from transient population calculations). The rule making should contain explicit guidance on NRC expectation in absence of such data/information.
2. The proposed guidance is heavily dependent on plans and even procedural level information (like bus schedules, etc.) from the OROs and other local entities (even private transit operators). Some of the information on hospital occupancies, beds, resources, etc., may not be available or will not be made public. The guidance does not provide any recommendations for when these plans and procedures are unavailable or incomplete. The final rule-making should have explicit guidance to address the issue.
3. The proposed 180-day turn-around time for ETE studies to NRC for review is not realistic. The following revision is recommended: Within 180 days of issuance of the decennial census data for transient and permanent populations by the U.S. Census Bureau, nuclear power reactor licensees and license applicants shall develop an ETE and submit it to the NRC for review and approval under § 50.4.
4. Requirement to include approved traffic control plans (signal timings) as part of the ETE Study. Such traffic control plans are rarely available for majority of the NPP communities. IEM concurs with the issues highlighted in the NEI white-paper (jointly developed after in-depth review of this draft guidance by ETE consultants and Industry) that incorporates industry response to this requirement and requests NRC to uphold the recommendations.

SUNSI Review Complete  
Template = ADM 013

E-RIDS = ADM-03  
Add: J. Laughlin (SxL)