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**NRCREP Resource**

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**From:** Sen, Atri [Atri.Sen@iem.com]  
**Sent:** Monday, October 19, 2009 6:43 PM  
**To:** Rulemaking Comments  
**Subject:** NUREG/CR-XXXX/SANIT2009-XXXX-P: "Criteria for Development of Evacuation Time Estimate Studies"- Draft: IEM Comments  
**Attachments:** ETE\_EP\_guidance\_comments\_IEM2Reg-Gov-Oct19-09final.doc

To Whom It May Concern:

Please find attached IEM's comments to the Draft guidance referenced above for your perusal.

Thank you,

Atri

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Add: J. Laughlin (SKL1)

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Subject: FW: NUREG/CR-XXXX/SAND2009-XXXX-P: "Criteria for Development of  
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## **NUREG/CR-XXXX/SAND2009-XXXX-P: “Criteria for Development of Evacuation Time Estimate Studies”: IEM Comments**

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). This may defeat the whole purpose of this guidance document.

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.
  - a. Will it be licensee’s responsibility to ensure the completeness of community plans to the level of detail warranted by this guidance?
  - b. Is this guidance overlapping with FEMA’s responsibility to manage and maintain community preparedness levels?
  - c. How should the ETE contractor handle situations where local planning and/or resources do not meet the standards assumed by this guidance document?

The final rule-making should have explicit guidance to address the issues listed above.

3. The above-referenced guidance necessitates:
  - a. Very strong coordination and collaboration with OROs as well as numerous local private and public entities as part of the ETE development process. This process is most likely to result in numerous meetings and data collection sessions, the schedules of which may be beyond the control of either licensee or the ETE contractor.
  - b. Inclusion and presentation of facility specific data (e.g. vehicle queue lengths at hospitals, schools, etc. per Tables 4-1 and 4-2), which are not readily available. These have to be developed through meetings and engagements with facility owners and stakeholders, who do not belong to traditional ORO entities. Some of the other information on hospital occupancy, etc. may not be disclosed to ETE contractors or licensees, especially in case of private facilities.

- c. A more involved and longer site-survey to gather the prescribed, detailed input parameters than normally undertaken, which will enhance the level of effort to conduct the study.
- d. A large number of scenario simulations, including the “what-if” runs that probably need to be done to account for a true assessment of “Improvements in Evacuation Time”, as laid out in Section 5.2.
- e. A more detailed and comprehensive technical report that needs to be formatted to ensure proper interpretation of the contents by non-technical reviewers. May result in increased review cycles before it is sent final, especially since OROs may be involved in the process.

In light of these, 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. Collection of such data in the field is a significant task and is deemed near-impossible, given the 180-day completion period for ETE studies.

IEM concurs with the issues highlighted in the NEI white-paper that incorporates industry response to this requirement and requests NRC to uphold the recommendations.