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General Comment

Overall, this is a good first attempt at revising portions of NUREG-0654. Unfortunately this revision uses too much draft documentation, academic theory & concept combined with computer simulation without support from empirical data. Far too much of the document shows having been written by NRC Staff with insufficient or no review and coordination by FEMA.

Information and recommendations provided in the Appendix is valuable and instructive, but it goes beyond the scope of the US Code of Federal Regulations or NRC/FEMA MOU documents. There is a definite difference between emergency planning guidance issued by FEMA for OROs and the legally established regulatory planning standards dictated by the NRC for nuclear power facilities. That distinction becomes very blurred when information such as this is written and published in an NRC authored document.

Considering the amount of change in this document recommends for the REP program and the information basis it wants to use, i.e. 2010 national census combined with subsequent site ETES, I request that NRC seriously consider retracting this document from public review and await the results of these efforts and a more complete and through review and coordination period with FEMA.

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