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# PUBLIC SUBMISSION

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Notice of Availability of NUREG-0654/FEMA-REP-1, Revision 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies

**Comment On:** NRC-2010-0080-0001

NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies; Draft for Comment

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Comment on FR Doc # 2010-04878

## Submitter Information

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**Government Agency Type:** State

**Government Agency:** Public Safety

## General Comment

The State of Minnesota Department of Public Safety Division of Homeland Security and Emergency Management has several concerns with the changes as proposed in the Supplement 3 document. Our primary concerns are outlined below:

1. Coordination with FEMA

The document as published is not consistent with the newly proposed REP Program Manual that FEMA is currently reviewing the public comments on. There does not appear to have been coordination between FEMA and the NRC on the off-site requirements proposed in the Supplement 3 document which will result in conflicting guidance.

We recommend that joint FEMA and NRC outreach meetings be conducted and the agencies explain how the new off-site requirements would be implemented. We would also like to see additional outreach meetings prior to the finalization of Supplement 3 document.

2. Proposed staged evacuations

Supplement 3 imposes a new PAR Logic Diagram and requires a more detailed staged evacuation by evacuating the 2-mile area first and sheltering the 5-mile areas downwind until the 2-mile area is evacuated and then evacuating the 5-mile downwind area.

SUNSI Review Complete  
Template = ADM-013

E-RIDS = ADM-03

Add = R. Sullivan (rxs3)

I have reviewed our Evacuation Time Estimate (ETE) studies (updated in December 2008) for both of our plants in Minnesota specifically looking at the evacuation time for the 2-mile and 5-mile sub areas. We have found that the difference in evacuation time from just evacuating the 2-mile area and evacuating the 2-mile area and any combination of the sub areas 5-miles downwind only results in a 10 minute difference in overall evacuation time for each site.

Based on the 10 minute overall evacuation time difference there would be no value added in evacuating the 2-mile area and sheltering out to 5-miles downwind and then 10 minutes later evacuating the 5-mile sub areas based on the current guidance.

For Minnesota, implementation of the proposed staged evacuation, would result in inconsistent public messages, reduced public confidence in the message, confusion of the public and may ultimately lead to delayed evacuation, larger shadow evacuations and a lower level of reasonable assurance for the public.

We recommend the language in Supplement 3 requiring the staged evacuation be made optional for sites with low overall evacuation times.

### 3. Utility requirement to conduct an assessment of off-site conditions prior to making a Protective Action Recommendation (PAR).

The proposed Supplement 3 language requires the utility to make an assessment of off-site conditions like road conditions and traffic impediments and consider those conditions when making a Protective Action Recommendation and consider sheltering verses evacuation for these types of conditions.

Minnesota does not concur that the assessment of off-site conditions is a responsibility of the utility and believes strongly the utility recommendations should be based on the on-site conditions and the science of potential exposure based on the release rate.

The utility does not have authority or resources to evaluate off-site conditions and make Protective Action Recommendations based on off-site conditions in a timely manner. Implementation of the proposed Supplement 3 will result in delays in development of Protective Action Recommendations and implementation of Protective Action Decisions.

We recommend the language in Supplement 3 requiring the utility to consider off-site conditions when making a Protective Action Recommendation is removed.

### 4. Heightened preparedness messages

The proposed Supplement 3 language requires new and additional messaging about heightened preparedness all areas around a plant. The guidance is unclear as to what constitutes a heightened preparedness message and the message may be confusing with all of the messages already being made.

We recommend the language in Supplement 3 requiring heightened preparedness messages be removed because it is duplicative of the messaging that already occurs.

### 5. School Evacuation Messaging

The proposed Supplement 3 language encourages having parents come to the schools in the impacted area to pick up their children even when the school is being evacuated. Minnesota does not support this type of messaging as it will encourage people to drive to the school when evacuations are underway way resulting in traffic congestion, confusion and evacuation delays.

We have worked very hard to have realistic school evacuation plans that relocate school children to a designated sister school early in an emergency. The parents are informed where to go and pick up their

children and child reunification procedures are in place for that site. When children are in school the school has specific custodial responsibilities and they must be maintained during evacuations so that no child is left behind. The reunification of children with their parents is a systematic process; encouraging parents to come to a school during an evacuation in progress and pick up children would delay evacuations and not ensure proper reunification with the parents.

We recommend the language in Supplement 3 about parents coming to the school during and evacuation to pick up children be removed.

#### 6. Implementation timeline

The document does not contain any information about the implementation timeline. There should be public comment sought on the timeline for implementation prior to finalization of the document.

NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies"; Draft for Comment is a multi-faceted document that requires many off-site requirements and needs DHS/FEMA endorsement. There does not appear to have been any DHS/FEMA, utility or Off-site Response Organization (ORO) involvement in the development of this proposal. Since the guidance has a significant impact on offsite response organization plans and procedures, it would seem appropriate to have DHS/FEMA endorsement and stakeholder input prior to final publication.