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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

Document: NRC-2010-0080-DRAFT-0014
Comment on FR Doc # 2010-04878

Submitter Information

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Government Agency Type: Local
Government Agency: City of Dana Point

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General Comment

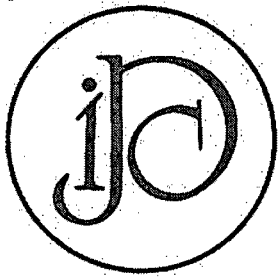
Please see the attached IPC letter to the NRC in reference to Docket NRC 2010-0080

Attachments

NRC-2010-0080-DRAFT-0014.1: Comment on FR Doc # 2010-04878

*SUNSI Review Complete
Template = ADM-013*

*E-RIDS = ADM-03
Add = B. Sullivan (RXS3)*



Interjurisdictional Planning Committee

County of Orange•County of San Diego•City of San Clemente•City of San Juan Capistrano
City of Dana Point•California State Parks•U. S. Marine Corps•Southern California Edison

May 4, 2010

Gregory B. Jaczko, Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16G4
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

Subject: Comment on Proposed Rulemaking
NRC Docket ID: NRC-2010-0080

Dear Chairman Jaczko;

On March 8, 2010, the U.S. Nuclear Regulatory Commission (NRC) published NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies; Draft Report for Comment." Please accept the following comments relating to this report from the San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC).

1. The IPC is requesting an extension to the posted comment period to a date no earlier than June 25, 2010. The IPC requests that at least one additional public meeting be conducted in early June in a location accessible to most stakeholders.
2. We would request that the NRC coordinate with FEMA to have the appropriate FEMA Radiological Emergency Preparedness program representatives present at the public meeting(s). Due to actual or perceived cross cutting issues effecting Offsite Responding Organizations (ORO) and licensee pre-emergency coordination and emergency protective action decision making, it is imperative that FEMA be engaged in this process with the stakeholders.
3. The IPC has long been a supporter and proponent of active ORO-Licensee relationships as we believe this is the best way to protect the public's health and safety during a radiological emergency. However, we also believe that our Federal partners must continue to work together to support these relationships by providing logical and reasonable guidance supporting the clearly defined oversight roles of FEMA and the NRC over the OROs and Licensees respectively. Many of the proposed requirements in this supplement require the licensee to

establish plans that clearly fall into the offsite emergency response arena, and may result in unintended consequences during an actual emergency. Further, offsite jurisdictions are not subject to NRC regulations and guidance and will not be required to implement changes being imposed upon licensees.

I would encourage the NRC to address these concerns and others in additional public meetings with offsite stakeholders and FEMA representation present to share their interpretation of these proposed changes and the potential results.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Rose". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Rose
Director of Disaster Preparedness, City of Dana Point
Chairman, SONGS IPC

The SONGS Interjurisdictional Planning Committee (IPC) is made up of representatives from the Offsite Responding Organizations in the Emergency Planning Zone of the San Onofre Nuclear Generating Station. These agencies include the Counties of Orange, and San Diego, the Cities of San Clemente, Dana Point, and San Juan Capistrano, the Marine Corps Base Camp Pendleton, and the California State Parks.

c: Commissioner Kristine L. Svinicki
Commissioner George Apostolakis
Commissioner William D. Magwood, IV
Commissioner William C. Ostendorff
James R. Kish, Director Technological Hazards Division, FEMA