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# PUBLIC SUBMISSION

**Docket:** NRC-2010-0080

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-0015

Comment on FR Doc # 2010-04878

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## General Comment

In order to adequately review and comment on NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies"; Draft for Comment, at least two documents necessary for the technical review of the draft guidance are not available. One being the 2010 National Census and the other being the subsequent ETEs which could greatly impact the development of site specific PAR logic diagrams and should be considered more carefully in the implementation schedule. And there are no indications that DHS/FEMA has endorsed or supports the draft guidance. Based on these observations, I request that NRC seriously consider retracting this document from public review and await the results of these efforts and a more complete and thorough review and coordination period with FEMA, then reissue the guidance once these concerns are addressed. At a minimum, cited documents should be made available in final form and the comment period extended to allow adequate time to evaluate the technical basis and applicability to NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies".

SONSI Review Complete  
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Call = R. Sullivan (YX53)