

# IEMA

Illinois Emergency Management Agency  
Division of Nuclear Safety

RULES AND DIRECTIVES  
BRANCH  
USNRC

Pat Quinn, Governor

Joseph G. Klinger, Interim Director

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May 11, 2010

Mr. Michael T. Lesar, Chief  
Rulemaking & Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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3/08/2010  
75 FR 10524

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Subject: Request for Extension of Comment Period for NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies; Draft for Comment, Docket ID NRC-2010-0080

To Whom It May Concern:

The Illinois Emergency Management Agency (IEMA) believes the efforts of the Nuclear Regulatory Commission (NRC) to revise the current draft guidance contained in *NUREG-0654, Supplement 3: Guidance for Protective Action Recommendations* is a positive step to update this guidance based on insights gained in Emergency Preparedness. The importance of this fundamental document for Protective Action Recommendations and the infrequency of its revision require that stakeholders have adequate time to consider the impact the State of the Art Reactor Consequence Analyses (SOARCA) may have on Supplement 3 to NUREG-0654. It is our understanding that a draft of the SOARCA results will soon be released in at least draft form. IEMA believes that it is essential the results of the SOARCA be reviewed and considered in any effort to upgrade Supplement 3.

Therefore, IEMA is requesting at least a 60-day extension be granted for comments on draft *NUREG-0654, Supplement 3*. This additional time is necessary to thoroughly review the results of the SOARCA study and the proposed changes to *NUREG-0654, Supplement 3* and, to

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Call = R. Sullivan (RX53)



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interpret the new draft guidance and its impact on our current protective action decision making and implementation process. Additionally, IEMA requests that the NRC, with FEMA participation, conduct at least one additional public meeting sometime during the extension period in a location accessible to most stakeholders. After our preliminary review, IEMA believes an additional public meeting is essential to gain additional insights and clarification on how to interpret this new guidance and its impact on our current protective action decision making and implementation process. This additional public meeting could also consider changes due to the SOARCA.

Sincerely,

  
Joseph G. Klinger  
Interim Director

JK/KE/tc

cc: File

