

25 West Jefferson St
Jefferson, OH 44047
440.576.9148
Fax 440.576.9059

**Ashtabula County
Emergency
Management Agency**

Fax

3/08/2010
15 FR 105-24
14

RECEIVED

2ND MAY 19 AM 7:48

RULES AND DIRECTIVES
BRANCH
USNRC

To: Michael T. Lesar	From: Ashtabula Co EMA
Fax: 301-492-3446	Pages: 4 including cover
Phone:	Date: 5/19/10
Re: Docket ID NRC 2010-0080	cc:

Urgent For Review Please Comment Please Reply Please Recycle

● **Comments:** Michael Lesar

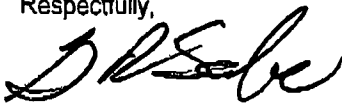
Chief, Rulemaking and Directives Branch
Division of Administrative services, Office of Administration
Mail Stop: TWB - 05-B01M

Dear Mr. Lesar

Please find attached the comments from Ashtabula County EMA for the proposed revisions to NUREG 0654-FEMA-REP-1, Rev1, Supplement 3.

I can be reached at via the contact information included on this cover page if there are any questions or concerns.

Respectfully,



George R Sabo

Ashtabula Co. EMA

grsabo@co.ashtabula.oh.us

SOWSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Add = R. Sullivan

(1X53)

Ashtabula County Ohio (Perry Nuclear Power Plant county)

DRAFT

NUREG-0654

FEMA-REP-1, Rev.1

Supplement 3

Docket ID NRC-2010-0080

No. 3566 P. 2

NUREG 0654 LANGUAGE/REFERENCE	COMMENT
General Comment	In theory, a staged evacuation looks good and modeling shows that it would be more effective. However, where is the 'behavioral analysis/studies' to show people would really comply with the request? Actual emergencies show that people will spontaneously evacuate when informed of an emergency that may/will require it. Example: Hurricane headed for the Outer Banks, N. C.; the Florida Keys.
Section 1, Page 1 The study results, documented in NUREG/CR-6953, "Review of NUREG-0654, Supplement 3, 'Criteria for Protective Action Recommendations for Severe Accidents,'" Volumes 1 and 2, (NRC, 2007a and NRC, 2008), (hereafter referred to as the PAR Study), show that shelter-in-place and staged evacuation can be more protective to public health and safety than radial evacuation, providing a technical basis for improving NRC PAR guidance.	The use of calculations and computer modeling may show a lower dose received for the most at risk members of the public, however, human nature may prove otherwise. Need to show that a member of the public will actually follow the protective action decisions made and will "shelter in place" or be on "heightened preparedness" instead of evacuating themselves.

Ashtabula County Ohio (Perry Nuclear Power Plant county)

DRAFT

NUREG-0654

FEMA-REP-1, Rev.1

Supplement 3

Docket ID NRC-2010-0080

No. 3566 P. 3

May. 19. 2010 7:44AM

<p>Section 3, Page A-6 Explanation regarding what to do with pets. Informational materials typically state that pets should be left at home or that pets are not allowed at congregate care centers. Research shows that residents are more likely to comply with an evacuation order if they can bring their pet (NRC, 2005; NRC, 2008a), thus, public information materials should not suggest that pets be left at home. Statements such as "pets are not allowed at congregate care centers" do not tell residents what to do with their pets. A statement such as "Pets may be brought to congregate care centers, provided they remain in a pet carrier, in the vehicle, or outside at all times," informs the recipient that pets may evacuate with the family but restrictions may apply. The policy on pets must be discussed with the operator of the congregate care centers, as some operators do place restrictions on pets.</p>	<p>Ensure any pet guidance aligns with existing/proposed FEMA guidance on pets. Do not duplicate.</p>
<p>Section 2.3, Page 7 Should licensees be unable to provide this assessment, the prudent action would be to implement precautionary protective actions. Heightened preparedness is one appropriate precautionary protective action.</p>	<p>"Heightened Preparedness" should not be called a protective action since the word action suggests 'TAKING ACTION' – THE ACT OF DOING SOMETHING. Heightened preparedness is planning ahead/now for AN EMERGENCY, not only for a radiological emergency.</p>
<p>Section 3.2, Page A-7 Public information materials should state that the evacuation will be directed by local authorities who will staff traffic control points throughout the evacuation area.</p>	<p>Public information does not need to go into this much detail. Why would the public need to know who will staff traffic control points throughout the evacuation area?</p>

Ashtabula County Ohio (Perry Nuclear Power Plant county)

DRAFT

NUREG-0654

FEMA-REP-1, Rev.1

Supplement 3

Docket ID NRC-2010-0080

No. 3566 P. 4

<p>Section 3.5, Page A-9 -Describe how authorities expect transit-dependent residents to get to a bus route -Discuss when the bus runs will start, taking into account that it may take an hour or longer to mobilize drivers and buses -Discuss how long residents may expect to wait for pickup.</p>	<p>Too much detail expected in communication to the public. The public has to take some responsibility for their own safety/planning. That's why public information suggests or should that transportation dependent persons preplan for an emergency of any nature by already having identified and contacted a family member or neighbor that they can call for assistance</p>
<p>Section 2.1, Page A-2 More specifically, the following items are necessary for assembling effective public warning messages (Mileti, 2000):</p>	<p>Define a "public warning message". Is it an EAS message? EAS Messages are limited to 2 minutes due to the Encoder memory capacity.</p>
<p>Appendix</p>	<p>Any information more than the 2 minute EAS message will be put out to the public through the Joint Information Center via the Public Information Officer.</p>
	<p>The excessively prescriptive guidance for messaging for the various groups (schools, special needs, transients) suggests that the general public does not have common sense. If all the suggested information for all the various groups is put out to the public in Special Information Bulletins/informational bulletins during an emergency, a message would never be complete.</p>

May. 19. 2010 7:45AM