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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

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## Submitter Information

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**Government Agency Type:** State

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## General Comment

The attached document contains the Ohio Emergency Management Agency's comments on the Draft of Supplement 3 to NUREG-0654.

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## Attachments

**NRC-2010-0080-DRAFT-0017.1:** Comment on FR Doc # 2010-04878

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RULES AND DIRECTIVES  
BRANCH  
USNRC

*SUNSI Review Complete  
Template = ADM-013*

*E-REDS = ADM-03  
Cdd = R. Sullivan (RX03)*

Dear NRC/FEMA,

The Ohio Emergency Management Agency (Ohio EMA) has reviewed the draft revision of NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies". We are submitting the following comments for your consideration:

- 1) The draft of Supplement 3 encourages the licensee to get more input from offsite response organizations during the development of their Protective Action Recommendation (PAR) logic diagram. In general Ohio EMA supports this idea, but disagrees with the suggestion that weather and road conditions be factors considered by the licensee. Traditionally these considerations are the purview of the counties as they have the resources and knowledge of the area to quickly and accurately assess these conditions. To incorporate these factors into the licensee's PAR process may actually delay the PAR issuance process as they will have to seek out this information. The licensee should be focused on conditions within the plant and base their PARs on those conditions. Consideration of how that PAR may need to be modified due to offsite conditions should be left in the hands of county when drafting their Protective Action Decision (PAD).
- 2) Will guidance be provided on the logistics of the collaboration between the licensee and offsite response organizations in developing the PAR logic diagram? For instance how is the collaborative process expected to be documented and how long must the documentation be maintained? How often will the PAR logic diagram have to be reviewed (e.g. annually, after a license amendment)?

Additionally, how will this process be managed in areas with multiple jurisdictions? If offsite agencies fall under the jurisdiction of different FEMA Regions, which Region will be responsible for evaluating the PAR logic diagram agreements? Will each FEMA Region be evaluating the agreements to a set standard that is applied consistently throughout the country? If the licensee and offsite response organizations cannot reach consensus on the PAR logic diagram how is the conflict resolved?

- 3) The Supplement 3 draft now recommends staged evacuation at General Emergency. The draft assumes that communicating the benefits of staged evacuation to the public will be sufficient to prevent shadow evacuation. Are other means to control or direct a staged evacuation being considered or developed? If so, will guidance be provided that describes these measures and how they can be implemented?

We have not yet evaluated the time difference between staged evacuations and the current evacuation methods in our EPZs. If these evaluations do not reveal a significant time

savings, will we still be required to use staged evacuation? If a significant time savings is not realized, changing the evacuation method would not be worth the effort to re-educate the public which has been conditioned to the current evacuation plans for twenty years. If we are required to adopt staged evacuation what training, workshops or guidance documents will be provided to assist in the transition to this new protective action? How long will jurisdictions be given to integrate staged evacuation into their plans and procedures?

- 4) The draft Supplement 3 focuses a great deal on communication with the public and suggests many additions to Emergency Alert System (EAS) messages and public information materials. Will the current two minute limit on EAS messages be expanded to accommodate the new information recommendations, or is it expected that the new information will be communicated to the public via supplemental news broadcasts?