

Board Of Commissioners
Robert E. Aufuldish, Raymond E. Sines, Daniel P. Troy



Lake County
Emergency Management Agency
Larry D. Greene, Director

3/08/2010
75 FR 10524
19

May 19, 2010

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

RE: Docket ID NRC-2010-0080

Dear Mr. Lesar:

Please accept the attached comments from Lake County (OH) EMA relative to **Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants**. Thank you for providing the forum that allows input from my agency.

Sincerely,

Larry D. Greene
Lake County EMA

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RULES AND DIRECTIVES
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USNRC

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SONSF Review Complete
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Lake County Ohio (Perry Nuclear Power Plant county)

DRAFT

NUREG-0654

FEMA-REP-1, Rev.1

Supplement 3

Docket ID NRC-2010-0080

NUREG 0654 LANGUAGE/REFERENCE	COMMENT
General Comment 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.	In theory, the concept of staged-evacuation sounds good and modeling may show it to be more effective. However, are there any independent "behavioral studies" that support the assumption people will comply with such a request? Any "real world" examples that verify populations won't just mass-evacuate when a Protective Action is issued. If they do exist, both should be cited in the guidance.

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<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 suggested pet guidance aligns with proposed FEMA guidance on pets. Latest FEMA release is:</p> <p><i>"Incorporating Household Pets and Service Animal Considerations Into Emergency Operations Plans"</i> <i>(March 2009 Draft)</i></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 deemed a valid protective action. The term tends to imply that potential "at risk" populations should be doing something, a perception that could foster confusion and place unnecessary stress on off-site communications capabilities and direction & control functions when needed most. A better suggestion may be to cultivate a general sense of "Heightened Awareness" beforehand, a planning goal best achieved through robust public education campaigns and, during actual events, timely media releases employing a wide array of communication mediums.</p>

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<p>Section 3.5, Page A-9</p> <ul style="list-style-type: none"> -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>Such detail related to public information is not practical. Emphasis should rather be placed on individual responsibility for contingency planning and identification of Special Needs populations. EPI publications should display exact locations of strategically-placed pick-up points and encourage neighborhood involvement to ensure everyone finds a way to get to one if a Protective Action is issued.</p>
<p>Section 2.1, Page A-2</p> <p>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 in Ohio are limited to two minutes by Encoder memory capacity and should contain a specific protection action for the public to follow (Evacuation, etc).</p> <p>Any information in excess of the two-minute EAS message will be disseminated through the Joint Information Center via Special News Bulletins and/or Special Information Bulletins.</p>