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General Comment

See attached file(s)

Attachments

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SONSI Review Complete
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Call = R.A. Jarvey (RAS)
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May 27, 2010

Mr. Michael T. Lesar
Rulemaking and Directives Branch
Office of Administration
Mailstop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Draft Regulatory Guide, DG-2004, "Emergency Planning for Research and Test Reactors" [Docket ID NRC-2010-0144]

Dear Mr. Lesar:

The National Fire Protection Association (NFPA) appreciates the opportunity to provide comments to the Nuclear Regulatory Commission (NRC) on the Draft Regulatory Guide, DG-2004, "Emergency Planning for Research and Test Reactors." NFPA develops over 300 safety codes and standards, many of these affect nuclear reactor facilities and may provide the NRC with additional resources to aid facilities in the development of emergency plans, particularly as they relate to radiological hazards. We encourage the NRC to include the following NFPA standards to strengthen the guide.

NFPA 801, *Standard for Fire Protection for Facilities Handling Radioactive Materials* (2008 edition) contains requirements for emergency planning for nuclear facilities that store, handle, or use radioactive materials in quantities and under conditions requiring government oversight and/or license. The inclusion of NFPA 801 in the proposed revision of Regulatory Guide 2.6 would be a valuable addition for facility emergency planning of the fire preparedness component and for informational purposes.

NFPA 1620, *Recommended Practice for Pre-Incident Planning* (2010 edition) outlines a process a licensed facility may develop with their local emergency response agencies to serve not only as a tactical tool during a response but as a communication tool to share information and site/product specific hazards with emergency responders. This practice eliminates many of the unknowns responders may face when dealing with incidents at such sites, given the relatively small number of such facilities and infrequent encounters with radioactive products.

NFPA 1600, *Disaster/Emergency Management and Business Continuity Programs* (2010 edition) details how a licensed operator may develop a documented emergency management program for the facility. It includes risk assessment, incident prevention, mitigation, resource/mutual aid and logistics management as key elements. This detailed guide allows facility operators to prepare a plan before an incident and provides an operational tool available to support local emergency responders during an incident. The Department of Homeland Security (DHS) endorses NFPA 1600 as an official EPrep Standard and has proposed it for use

in their Voluntary Private Sector Preparedness Accreditation and Certification Program (PS-Prep) reinforcing the standard's value to emergency planning.

NFPA 472, *Competencies for Responders to Hazardous Materials/Weapons of Mass Destruction* (2008 edition) provides facilities with a tool to identify base level competencies for onsite response teams. Annex D lists Competencies for Responders Assigned to Radiological Agents and may be a useful way to communicate to local emergency responders the capabilities of the onsite teams and level of intervention they can be expected to safely provide prior to an incident.

Thank you for the opportunity to share our views on the NRC's Draft Regulatory Guide DG-2004. If you have any questions or require additional information, please do not hesitate to contact me at (202) 898 1229 or Ken Willette, Division Manager, Public Fire Protection at (617) 984 7299.

Sincerely,

Nancy McNabb, AIA
Director, Government Affairs

cc: pmay, kwillette, cdubay
encl: NFPA 472, 801, 1600, 1620