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Comment On: NRC-2010-0080-0009
NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies; Draft for Comment

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General Comment

Overall, this is a good first attempt at revising portions of NUREG-0654. Unfortunately this revision uses too much draft documentation, academic theory & concept combined and computer simulation without any support from empirical data. Far too much of the document shows having been written by NRC Staff with insufficient or no review and coordination by FEMA.

Information and recommendations provided in the Appendix is valuable and instructive, but it goes beyond the scope of the US Code of Federal Regulations or NRC/FEMA MOU documents. There is a definite difference between emergency planning guidance issued by FEMA for OROs and the legally established regulatory planning standards dictated by the NRC for nuclear power facilities. That distinction becomes very blurred when information such as this is written and published in an NRC authored document. Once again, the approach of putting information and recommendations of this nature attempts to extend NRC influence beyond that of regulating the nuclear power industry.

Attachments

NRC-2010-0080-DRAFT-0025.1: Comment on FR Doc # 2010-11842

SOUSI Review Complete
Template = ADH-013

E-REDS = ADH-03
Add = R. Sullivan (X53)

North Carolina Division of Emergency Management

COMMENTS ON PROPOSED NUREG 0654/FEMA-REP-1, Rev 1, Supp 3

<u>ITEM</u>	<u>MANUAL REFERENCE</u>	<u>CURRENT LANGUAGE</u>	<u>RECOMMENDATION/COMMENT</u>
1.	SECTION 1 <u>INTRODUCTION</u> Sub-paragraph 3 Page 1	<p>Although rapidly progressing severe accidents are very unlikely, nuclear power plant emergency preparedness programs are designed to respond to a wide spectrum of accidents including these scenarios. The NRC staff examined various PAR strategies for each of the three General Emergency accident conditions, including the following:</p> <ul style="list-style-type: none"> • immediate radial evacuation, which is the current strategy of evacuation away from the plant • lateral evacuation, which is evacuation perpendicular to the plume • staged evacuation, where the close-in population leaves first while others shelter-in-place and then leave • shelter-in-place, where residents shelter at home or in their current location followed by radial evacuation • shelter-in-place, followed by lateral evacuation • preferential sheltering, which includes use of large public structures followed by radial evacuation • preferential sheltering, followed by lateral evacuation 	<p>DELETE ALL</p> <p>These are evacuation concepts that are only supported by academic theory (telephone surveys) and computer model simulation. There is no existing empirical evacuation data that supports or suggests the concepts especially when applied to evacuation for a technological hazard such as radiation.</p> <ul style="list-style-type: none"> • Lateral evacuation, which is evacuation perpendicular to the plume <i>(This concept is heavily dependent on the local roadway network and detailed pre-evacuation planning along with being highly related to the population density of the evacuation area.)</i> • Staged evacuation, where the close-in population leaves first while others shelter-in-place and then leave • Shelter-in-place, where residents shelter at home or in their current location followed by radial evacuation • Shelter-in-place, followed by lateral evacuation • Preferential sheltering, which includes use of large public structures followed by radial evacuation • Preferential sheltering, followed by lateral evacuation
2.	SECTION 1 <u>INTRODUCTION</u> Sub-paragraph 6 & 7 Page 2	<p>These results guided this revision of NUREG-0654, Supplement 3. This revised guidance considered additional insights from the PAR Study, as well as input from State and local government emergency response professionals, stakeholders, and industry. In addition to the technical analyses documented in NUREG/CR-6953, Volume 1, the NRC staff conducted a public telephone survey of EPZ populations. The public survey provided information on the tendencies of EPZ populations with respect to emergency response. These insights assisted the NRC staff in improving the PAR guidance; the NRC published the survey results in NUREG/CR-6953, Volume 2 (NRC, 2008).</p> <p>This Supplement 3 to NUREG-0654 supersedes previous guidance on the development of PAR logic for nuclear power</p>	<p>While this document is titled as a Supplement to a joint NRC/FEMA document, all the research data, survey information and drafting has been accomplished solely by NRC. Although the language indicates input from State and local government emergency response professionals, stakeholders, and industry, far too much of the document shows having been written by NRC Staff with insufficient or no review and coordination by FEMA, State & Local REP stakeholders. The final wording is NRC <u>directive</u> in nature.</p> <p>Strongly recommend that following current Federal Register Review, NRC <u>with</u> FEMA adjudicate the comments and provide ALL state and local government emergency response professionals, stakeholders, and industry stake holders a <u>second review period</u> of no less than <u>75 working days</u>.</p>

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		<p>plant accidents, including the guidance contained in Appendix 1, "Emergency Action Level Guidelines for Nuclear Power Plants," of NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," (NRC, 1980), and NUREG-0654/FEMA-REP-1, Revision 1, Supplement 3, "Criteria for Protective Action Recommendations for Severe Accidents," published in 1996 as a draft report for interim use and comment (NRC, 1996).</p>	
<p>3.</p>	<p>SECTION 1 <u>INTRODUCTION</u> Sub-paragraph 8 Page 3</p>	<p>Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) 50.47(b)(10) states, in part, "Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place...." This supplement is considered "Federal guidance" as referred to in the regulation, and it will be used to aid in determining compliance with 10 CFR 50.47(b)(10). By issuing this guidance, the NRC does not intend to affect the protective action guidelines developed and promulgated by the U.S. Environmental Protection Agency (EPA). The EPA protective action guides remain the appropriate Federal guidance on radiological criteria for consideration of protective actions.</p>	<p>This paragraph states that this Supplement is to be considered "Federal Guidance" as listed in Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) 50.47(b)(10). The following statement, "By issuing this guidance, the NRC..." directly indicates that this document is solely an NRC <u>directive</u> document, <u>NOT</u> a joint NRC/FEMA document.</p> <p>If this is an NRC document, the Communications Appendix needs to be removed and the applicability to the wording determined by FEMA. If this information is to be used by Off-site Response Organizations (ORO) then it should be published as a part of the REP Program manual or as a separate FEMA PIO guidance document.</p> <p>This is an overt attempt by NRC to directly influence and direct Off-Site activity which is outside its sphere of influence.</p>
<p>4.</p>	<p>SECTION 2 <u>IMPLEMENTATION OF GUIDANCE</u> Sub-paragraph 1 Page 5</p> <p>(See Item 12 – 17 for comments on the PAR Logic Diagram)</p>	<p>The Attachment to this supplement contains a PAR logic diagram, which should be used to develop a site-specific PAR logic diagram for use by the licensee's emergency response organization (ERO). The PAR Logic Diagram (Attachment 1) is not intended to be used without site-specific modification. The site-specific PAR logic diagram is expected to be contained in emergency plan implementing procedures used by the nuclear power plant ERO. The Attachment is intended to guide the development of a PAR procedure for operational shift personnel and is designed to be implemented</p>	<p>REVISE & REWRITE</p> <p>While the intent of this paragraph seems to be to have the individual sites develop a set of severe accident (General Emergency) PARs in conjunction with the OROs, the wording seems to ramble and is very confusing.</p> <p>The "bottom line" seems to be that "The NRC expectation as demonstrated by licensees in biennial evaluated exercises, is that licensees will include a PAR with the General Emergency notification. The 15 minute time requirement remains in effect regardless of</p>

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		<p>rapidly without the initial need to confer with offsite response organization (ORO) personnel. The PAR logic diagram used by the licensee augmented ERO may differ reflecting the expectation that the augmented ERO has more resources than the shift organization. Section IV.D.3 of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," requires licensees to have the capability to notify OROs within 15 minutes of the declaration of a General Emergency. The NRC expectation, as demonstrated by licensees in biennial evaluated exercises, is that licensees will include a PAR with the General Emergency notification. The 15 minute time requirement remains in effect regardless of differences in licensee PAR logic diagrams used by shift and by augmented ERO personnel. The PAR must be made rapidly, in accordance with approved procedures, and those procedures should be developed in partnership with the responsible OROs.</p>	<p><i>differences I licensee PAR logic diagrams used b shift and by augmented ERO personnel. The PAR must be made rapidly, in accordance with approved procedures and those procedures should be developed in partnership with the responsible OROs."</i> (Bold added)</p> <p>Statements like "The PAR logic diagram used by the licensee augmented ERO may differ reflecting the expectation that the augmented ERO has more resources than the shift organization." Raises questions as to who is providing the information to the ORO and what documentation is being used to create this information. This is ESPECIALLY important if this information was what was supposed to be created in partnership with the ORO!</p>
5.	<p style="text-align: center;">SECTION 2 IMPLEMENTATION OF GUIDANCE Sub-paragraph 2, Line 3-10 Page 5</p>	<p>The NRC suggests that nuclear power plant licensees and the OROs responsible for implementing protective actions discuss and agree to various elements and criteria of the licensee and ERO PAR logic diagram(s). However, in no case does the NRC intend that nuclear power plant licensees delay the recommendation of protective actions to confer with OROs at the time of a General Emergency. Licensees are responsible for making timely PARs, in accordance with Federal guidance and plant conditions, and for providing the PARs to OROs to allow them to make timely and well-informed protective action decisions.</p>	<p>REVISE/REWRITE</p> <p>What is the difference between the licensee and the ERO? As written, these appear to be two separate and distinct groups with no connection. This verbiage goes back to the confusion created in the opening paragraphs of this section – what utility/licensee organizations are we discussing – the on-shift control room staff / the ERO (or portions of) / etc – are we discussing. There seems to be direction being given to the licensee in lines 6-10 that the 15 minute requirement from Paragraph 1 is paramount at this time in an event.</p>
6.	<p style="text-align: center;">SECTION 2 IMPLEMENTATION</p>	<p>The NRC expects that nuclear power plant licensees will develop PAR procedures that include ORO input at various</p>	<p>REWRITE – Change to read as follows:</p> <p>"The NRC encourages the nuclear power plant licensees to develop</p>

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	<p><u>OF GUIDANCE</u> Sub-paragraph 3 Line 1 - 3 Page 5</p>	<p>decision points, identified in the guidance, and that this input will guide the criteria used in the PAR logic diagram.</p>	<p>PAR procedures and associated PAR Logic Diagrams that include ORO input at the various decision points identified in this guidance.”</p> <p>As currently written, this sentence conflicts with the closing sentence in this paragraph which recognizes that in some rare cases the ORO may chose not to participate in the development of the site-specific Par logic diagrams. The rewrite brings the two sentences and section guidance together.</p>
7.	<p><u>SECTION 2 IMPLEMENTATION OF GUIDANCE</u> Sub-section 2.2 <u>Termination of Protective Actions</u> Page 6</p>	<p>Licensee emergency plans are designed to support mitigative actions to ameliorate plant accidents, and an ongoing NRC study, (the State-of-the-Art Reactor Consequence Analysis, yet unpublished) concludes that mitigative actions will likely be successful. A licensee is responsible for declaring a General Emergency and issuing a PAR; however, a licensee is not responsible for making a recommendation for terminating a protective action direction already given to the public. The licensee is responsible for downgrading the General Emergency but is not expected to do so without wide consultation. Downgrading an emergency may take time to ensure that the plant condition will remain safe and to confer with authorities. Corresponding protective actions should not be terminated by OROs until fully discussed among responsible State and local officials, with the licensee supplying input regarding plant status. The PAR logic diagram recognizes this path and provides decision points for protective actions, based on the current plant status.</p>	<p>REWRITE – Change to read as follows:</p> <p>“Licensee emergency plans are designed to support actions to mitigate plant accidents. While a licensee is responsible for declaring a General Emergency and issuing a PAR, the licensee is not directed to make recommendations as to terminating a protective action previously given to the public by the OROs. The licensee is responsible for down grading the General Emergency ECO when due to mitigation actions the General Emergency criterion is no longer applicable. Such down grade action should not be accomplished without consultation both internal and external to the site. Action to downgrade an emergency should be expected to take sufficient time as to ensure that plant conditions will remain stable and safe both during and following conferences with local authorities.”</p>
8.	<p><u>SECTION 2 IMPLEMENTATION OF GUIDANCE</u> Sub-section 2.3 <u>Precautionary Protective Actions at Site Area</u></p>	<p>The NRC does not require precautionary protective actions in response to Site Area Emergency or lesser emergency classifications. However, OROs at many sites already plan precautionary actions upon declaration of a Site Area Emergency, and some have plans for actions at the Alert level. These actions typically include sounding sirens, informing the population that an event has taken place at the site, evacuating</p>	<p>DELETE ALL</p> <p>How OROs plan and execute their emergency plans is the express responsibility of the individual State or local government. It is these response organizations that determine what the timing of response action to be in the best interest of their citizens. This activity is totally outside the purview of the NRC.</p>

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	<p>Emergency Page 6</p>	<p>schools, closing parks, and preparing special needs facilities for potential evacuation. Site Area Emergencies rarely occur. A review of actual Site Area Emergencies that have taken place since 1980 concluded that none required offsite protective actions. Some of these emergencies were declared because of an overly conservative emergency action level (EAL) scheme that has largely been replaced at nuclear power plants. However, the PAR Study (NRC, 2007a) and the historical record illustrate that precautionary protective actions are prudent only for a Site Area Emergency that is a precursor to a more serious event.</p> <p>The NRC does not recommend that precautionary protective actions be automatic at the Site Area Emergency level. The NRC expects that licensees will be able to discern whether a Site Area Emergency is a potential precursor to a more serious accident or, as in the historical cases, that core damage is not likely. The NRC recommends that OROs consider the implementation of precautionary protective actions appropriate for their locale following a Site Area Emergency declaration after conferring with licensee personnel regarding the nature of the event and the likelihood of core degradation. 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>In some cases, a licensee or ORO may have committed to site-specific precautionary protective actions, such as early or preferential evacuation, or both, of beaches or other recreational areas at the Site Area Emergency. This guidance should in no way be interpreted as countermanding these commitments which may exist in licensing-basis documents or in State emergency plans.</p>	

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9.	<p>SECTION 3 <u>DETERMINATION OF PAR FOR RAPIDLY PROGRESSING SCENARIOS</u> Sub-paragraph 4 Page 9</p>	<p><i>NRC Defines – “a rapidly progressing event, in this context, is defined as a scenario in which a large radioactive release may occur in less than 1 hour.”</i></p> <p>For sites where the 90-percent ETE for the general public of the full EPZ is less than about 3 hours, results showed that, for the rapidly progressing scenario, evacuation is the most appropriate protective action. For sites where this is not the case, the protective actions given below are most beneficial, unless impediments exist to implementation. Where evacuation cannot be accomplished in the time specified, shelter-in-place until the plume has passed is more beneficial. The evacuation tail generally represents the last 10 percent of the population and describes the population that takes a disproportionately longer time to evacuate than the remaining public. Planning is in place to evacuate 100 percent of the public; however, protective action recommendations and decisions should be based on the 90 percent ETE values.</p> <p>0 to 2 mile (0 to 3.2 kilometer) zone – If the 90 percent ETE for this area is 2 hours or less, immediately evacuate.</p> <p>2 to 5 mile (3.2 to 8 kilometer) zone – If the 90 percent ETE for this area is 3 hours or less, immediately evacuate.</p> <p>5 to 10 mile (8 to 16 kilometer) zone – Shelter-in-place, then evacuate when safe to do so.</p>	<p>REVISE/REWRITE</p> <p>Guidance presented in this paragraph is counter to previous recommendations and the specified factors (Para 2) influencing an efficient safe evacuation. Even if the 0-2 mile 90% ETE evacuation shows to be 2 hours or less, this places evacuees in a more hazardous position – outside, in a vehicle, susceptible to the effects of the plume – for possibly 1 hour or more based on the NRC definition of a rapidly progressing event. This goes counter to one of the basic concepts of Emergency managements which is to “NOT put citizens or responders in a more hazardous situation that they are in currently.”</p>

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10.	Section 5 <u>Glossary</u> Page 13		<p>ADD THE FOLLOWING (IF NOT DELETED AS PREVIOUSLY RECOMMENDED):</p> <ul style="list-style-type: none"> • Lateral evacuation - evacuation method where evacuation movement is perpendicular to the direction of the plume • Staged evacuation – evacuation method where the close-in population evacuates first while others shelter-in-place and wait before evacuating. • Shelter-in-place – evacuation method where residents shelter at home or in their current location followed by radial evacuation at a later time. • Preferential sheltering – evacuation method where individuals use large public structures for Shelter-in-place followed by a radial evacuation
11.	Section 6 <u>References</u> Page 15	Nuclear Regulatory Commission (U.S.) (NRC). NUREG/CR-6953, Vol. III. "Review of NUREG-0654, Supplement 3, 'Criteria for Protective Action Recommendations for Severe Accidents. Technical Basis for Protective Action Logic Diagram.'" NRC: Washington, D.C. 2010 Draft.	This is a DRAFT document and as such should not be used as basis for a guidance document. If the information contained in this document is so vital to the guidance provided here, the review and publishing of Supp 3 MUST be delayed until this document is approved and published IAW current Federal publishing guidelines.
12.	Attachment <u>Protective Action Recommendation Logic Diagram</u> Page 17-19		<p>REVISE</p> <p>As shown the PAR Logic diagram is both incomplete and cumbersome. The logic flow leads to a condition box, "Continue Assessment (11)" (#1), that essentially puts the site in a circular motion with no guidance on what action should be taken next. Recommend that a control line (#2) be drawn to connect the box with the box labeled "Continue assessment, maintain PAR" (#3). This condition box should lead to a Decision Point to help determine if and/or when the assessment allows the implementation of the condition indicated at #4 or go to some additional condition box.</p>
13.	Attachment <u>Protective Action</u>		There are too many notes requiring reference during use of this Diagram. A Decision making Diagram should be as simple and easy to

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	<u>Recommendation</u> <u>Logic Diagram</u> Page 17-19		follow as possible. Every step of this diagram requires the reference to one or more notes for clarification of the step or decision point. Many of the notes have multiple parts which are applicable only when the specific condition exist i.e. hostile action.
14.	<u>Attachment</u> <u>Protective Action</u> <u>Recommendation</u> <u>Logic Diagram</u> Note 4 Page 18	This includes downwind sector(s) and adjacent sectors.	DELETE This note is superfluous based on federal guidance that states any portion of a sector that falls with the "key-hole" is to be evacuated.
15.	<u>Attachment</u> <u>Protective Action</u> <u>Recommendation</u> <u>Logic Diagram</u> Note 7 Page 19	At T=X hours, where X equals the site-specific 2-mile (3.2-kilometer) ETE for 90 percent evacuation, (e.g., 3 hours after the public is notified of the initial PAR), the licensee should evaluate the need to expand the PAR, based on plant conditions. The licensee identifies the value of T using the site-specific ETE and shall consider TD for a daytime ETE and TN for a nighttime ETE. These values should be representative for the site and should not include special events. The shift staff is expected to make this PAR without conferring with OROs, and the PAR is based on the ETE time value alone, not on verification of evacuation progress. If the augmenting emergency response organization (ERO) has been activated, there should be sufficient resources available for the licensee to confer with OROs more fully.	REVISE/REWORD As written, this note is directing calculations to be made during the determination of an ECL & PAR, there by adding additional time & stress to the control room staff.
16.	<u>Attachment</u> <u>Protective Action</u> <u>Recommendation</u> <u>Logic Diagram</u> Note 8, Sub-paragraph 1 Page 19	If the impediment was the time to set up evacuation support (e.g., at a high-population site) - When the agreed-to time (e.g., 1 hour) for evacuation support to be in place has elapsed, the PAR should be changed. Licensee shift staff is not expected to confer with OROs before changing the PAR although, if the ERO is activated, they may confer.	REVISE/REWORD Without conferring with the OROs, this decision point defaults to NO. The ERO should ALWAYS confer with the off-site agencies to determine if evacuation impediments exist. It is highly possible that impediment to a timely evacuation may arise after the evacuation has been recommended and initiated, i.e. traffic accidents.
17.	<u>Attachment</u> <u>Protective Action</u>	The NRC expects that licensees would discuss evacuation of the sheltered population with OROs and plan for rapid	DELETE Movement of citizens "through potentially contaminated areas" is once

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	<u>Recommendation Logic Diagram</u> Note 10, Sub-paragraph 2 Page 20	evacuation of the public through potentially contaminated areas. Lateral evacuation should be considered, as it may reduce public exposure where the roadway network and plume meander are conducive.	again counter to one of the basic concepts of Emergency Managements which is to "NOT put citizens or responders in a more hazardous situation that they are in currently." Actions such as this MUST be considered VERY carefully and with ALL CURRENT situation information available to the decision makers.
18.	Appendix EFFECTIVE COMMUNICATION WITH THE PUBLIC TO SUPPORT EMERGENCY PREPAREDNESS AND RESPONSE Pages A-1 - A-20		<p>DELETE ENTIRELY</p> <p>Information and recommendations provided in this segments while valuable goes beyond the copy of US Code of Federal Regulations or NRC/FEMA MOU documents There is a definite difference between emergency planning guidance issued by FEMA for OROs and the legally established regulatory planning standards dictated by the NRC for nuclear power facilities. That distinction becomes very blurred when information such as this is written and published in an NRC authored document. Once again, the approach of putting information and recommendations of this nature attempts to extend the NRC's influence beyond that of regulating the nuclear power industry.</p> <p>We feel that these actions are an intrusion by the NRC into how the States & Local governments respond to an emergency. Daily activity with our Federal, local and private sector partners in this area allows us to best protect the citizens of North Carolina, which is the ultimate goal for all associated with this program.</p>

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Protective Action Recommendation Logic Diagram

