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# PUBLIC SUBMISSION

**Docket:** NRC-2010-0080

Notice of Availability of NUREG-0654/FEMA-REP-1, Revision 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies

**Comment On:** NRC-2010-0080-0009

NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies; Draft for Comment

**Document:** NRC-2010-0080-DRAFT-0035

Comment on FR Doc # 2010-11842

## Submitter Information

**Name:** Richard Ayers

**Address:**

2220 Ady Road  
Forest Hill, MD, 21050

**Organization:** Harford County Emergency Operations

**Government Agency Type:** Local

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## General Comment

I'm the Emergency Manager for Harford County, Maryland and also the current chairman of the PBAPS (Peach Bottom Atomic Power Station) off-site planning committee. I have attached my comments to the proposed changes and shared them with the PBAPS off-site committee. Furthermore, I have spoken about these changes at a meeting held in Bethesda, Maryland in April.

## Attachments

**NRC-2010-0080-DRAFT-0035.1:** Comment on FR Doc # 2010-11842

*SOUSI Review Complete  
Template = ADM-013*

*E-REDS = ADM-03  
Call = R. Sullivan (RX53)*

NUREG 0654 FEMA REP-1, Rev 1  
Supplement 3  
Guidance for Protective Action Recommendations for General Emergencies

Harford County, Maryland

Emergency Management  
Comments

Richard A. Ayers Sr  
Emergency Manager

Harford County, Md comments:

### **1. Coordination with FEMA**

I Rick Ayers Emergency Manager for Harford County, Maryland just completed the L-340 REP Program and Planning Course. This document as published is not consistent with the newly proposed REP Program Manual that FEMA is currently reviewing and asking for public comments on. For example: the revised PAR logic is not referenced in the plan review or exercise evaluation criteria and "there are no references to the proposed supplement 3 or its processes in the REP program manual." Was there coordination between FEMA and the NRC on the off-site requirements proposed in the Supplement 3 document which will result in conflicting guidance? I currently chair the PBAPS (Peach Bottom Atomic Power Station) Risk County Coordination Committee and recommend that joint FEMA and NRC outreach meetings be conducted and the agencies explain how the new off-site requirements would be implemented. As Chairman of our local committee, I would agree to host these outreach meetings in Harford County, Maryland. I would request that these meetings be held prior to the finalization of the Supplement 3 document.

### **2. Proposed staged evacuations**

Supplement 3 imposes a new PAR Logic Diagram and requires a more detailed staged evacuation by evacuating the 2-mile area first and sheltering the 5-mile areas downwind until the 2-mile area is evacuated and then evacuating the 5-mile downwind area.

I have reviewed our Evacuation Time Estimate (ETE) studies (August 2003) for the Peach Bottom Atomic Power Plant specifically looking at the evacuation time for the 5-mile sub areas. Harford County, Maryland is not located in the 2-mile EPZ. I have found that the difference in evacuation time from just evacuating the 5-mile area and evacuating the 10-mile area and any combination of the sub areas 10-miles downwind to be negligible. In fact, the 5 mile evacuation for sector Southwest takes 6 hrs and 30 minutes and the 10 mile evacuation for sector Southwest is also 6 hrs and 30 minutes. Based on this information and no overall evacuation time difference there would be no value added in evacuating the 5-mile area and sheltering out to 10-miles downwind and then 10 minutes later evacuating the 10-mile sub areas based on the current guidance. This would also hold true for the PBAPS counties that deal with the proposed 2-mile and 5-mile sub area recommendations. For Harford County, implementation of the proposed staged evacuation, would result in inconsistent public messages, reduced public confidence in the message, confusion of the public and may ultimately lead to delayed evacuation, larger shadow evacuations and a lower level of reasonable assurance for the public. Harford County has trained

and educated our public for years that evacuation would be our first choice to protect them and now the recommendation is to change that process. Harford County does not agree with this recommendation at all.

Harford County recommends the language in Supplement 3 requiring the staged evacuation be deleted or made optional for sites that choose to use it.

### **3. Utility requirement to conduct an assessment of off-site conditions prior to making a Protective Action Recommendation (PAR).**

The proposed Supplement 3 language requires the utility to make an assessment of off-site conditions like road conditions and traffic impediments and consider those conditions when making a Protective Action Recommendation and consider sheltering verses evacuation for these types of conditions. Harford County, Maryland does not concur that the assessment of off-site conditions is a responsibility of the utility and believes strongly the utility recommendations should be based on the on-site conditions and the science of potential exposure based on the release rate. The utility does not have authority or resources to evaluate off-site conditions and make Protective Action Recommendations based on off-site conditions in a timely manner. This decision should be made at the local level and should not be considered in the proposed Supplement 3 document and will result in longer delays in development of Protective Action Recommendations and implementation of Protective Action Decisions.

Harford County recommends the language in Supplement 3 requiring the utility to consider off-site conditions when making a Protective Action Recommendation is removed.

### **4. Heightened preparedness messages**

What does this mean? The proposed Supplement 3 language requires new and additional messaging about heightened preparedness for all areas around a plant. The guidance is unclear as to what constitutes a heightened preparedness message and the message may be confusing with all of the messaging already being made. Harford County already uses additional messaging to our citizens through our Emergency Notification System. I recommend the language in Supplement 3 requiring heightened preparedness messages be removed because it is duplicative of the messaging that already occurs and is very unclear.

### **5. School Evacuation Messaging**

The proposed Supplement 3 language encourages having parents come to the schools in the impacted area to pick up their children even when the school is being evacuated. Harford County does not support this type of messaging as it will encourage people to drive to the school when evacuations are underway way resulting in traffic congestion, confusion and evacuation delays. We have worked very hard to have realistic school evacuation plans that relocate school children to a designated sister school early in an emergency. The parents are informed where to go and pick up their children and child reunification procedures are in place for that site. When children are in school the school has specific custodial responsibilities and they must be maintained during evacuations so that no child is left behind. The reunification of children with their parents is a systematic process; encouraging parents to come to a school during an evacuation in progress and pick up children would delay evacuations and not ensure proper reunification with the parents.

We recommend the language in Supplement 3 about parents coming to the school during and evacuation to pick up children be removed.

## **6. Implementation timeline**

The document does not contain any information about the implementation timeline. There should be public comment sought on the timeline for implementation prior to finalization of the document. NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies"; Draft for Comment is a multi-faceted document that requires many off-site requirements and needs DHS/FEMA endorsement. There does not appear to have been any DHS/FEMA, utility or Off-site Response Organization (ORO) involvement in the development of this proposal. Since the guidance has a significant impact on offsite response organization plans and procedures, it would seem appropriate to have DHS/FEMA endorsement and more stakeholders input prior to final publication.