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Ms. Cindy K. Bladey
Chief, Rules, Announcements and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Comments on NRC Proposed NUREG-0654 FEMA-REP-1, Revision 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies; Draft for Comment," *Federal Register* (FR Vol. 75, No. 44), Docket ID NRC-2010-0080

Project Number: 689

Dear Ms. Bladey:

On June 8, 2010, Nuclear Energy Institute (NEI)¹ submitted comments on the proposed NUREG-0654 FEMA -REP 1, Revision 1, Supplement 3, on behalf of the nuclear energy industry. In Attachment 1, NEI Comment # 1, of the June 8th letter, we proposed an example of an evaluation matrix as an alternate approach that could assist the users in implementation of Supplement 3. The intent of proposing the sample matrix as an alternate approach was to provide the clarity and guidance necessary to achieve a more consistent, systematic approach for public protective action strategy development using Supplement 3. Comments provided by our offsite response organization partners during the five NRC public meetings obviated the need for the additional clarity for implementing the guidance contained in Supplement 3.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear material licensees, and other organizations and individuals involved in the nuclear energy industry.

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In our June 8th letter, we stated that NEI intended to provide a complete evaluation matrix for NRC review prior to the close of the proposed Supplement 3 comment period on August 9, 2010. Based on the discussions at the subsequent NRC public meetings related to Supplement 3, NEI has determined that the evaluation matrix is best suited for inclusion in an NEI technical document.

Following the release of the final approved version of Supplement 3, NEI will develop a complete evaluation matrix tool intended for use by both licensees and their offsite response organization partners. It is our intent at this time that we would engage the NRC and FEMA on this approach as a proposed NEI technical document and ultimately seek endorsement of the document.

If you have any questions, please contact Martin Hug at (202) 739-8129; mth@nei.org.

Sincerely,



Susan Perkins-Grew

c: Mr. Christopher G. Miller, NSIR/DPR/DDEP, NRC
Mr. Robert E. Kahler, NSIR/DPR/DDEP/IR, NRC
Mr. Randy L. Sullivan, NSIR/DPR/DDEP/IR, NRC
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