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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

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Comment on FR Doc # 2010-11842

Submitter Information

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Organization: Maricopa County Department of Emergency Management

Government Agency Type: Local

Government Agency: Emergency Management

General Comment

See attached file(s)

Attachments

NRC-2010-0080-DRAFT-0046.1: Comment on FR Doc # 2010-11842

SUNSE Better Complete
Template = ADH-013

FRIDS = ADH-03
Add = B. Pullman (RX53)



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August 6, 2010

Mr. Michael T. Lesar
Chief, Rulemaking and Directives Branch
Division of Administrative Services, Office of Administration
Mail stop: TWB-05-BO1M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Docket ID NRC-2010-0080

Dear Mr. Lesar,

Maricopa County provides the local offsite response for the Palo Verde Nuclear Generating Station 10-mile Emergency Planning Zone. We have reviewed the draft copy of NUREG-0654 FEMA-REP-1, Rev. 1, Supplement 3 and have attached our comments for your consideration.

Thank you for the opportunity to review and comment on this proposed rule change.

Sincerely,

A handwritten signature in black ink that reads "Pete Weaver".

Pete Weaver, Director

Attachments:

NUREG-0654 Language/Reference	Comment
<p>Note 2 Impediments include the following: Evacuation support not yet in place - For example, the GE is the initial notification to offsite response organizations or if there is a previous emergency classification notification, the GE notification occurs before preparations to support evacuation. Many sites have a low population density within 2 miles (3.2 kilometers) and evacuation support readiness will not be considered an impediment. This element should be discussed and agreed to with offsite response organizations (OROs). The expected time for evacuation support to be put in place should be agreed to with OROs in advance and embodied in the site-specific protective action recommendation (PAR) logic diagram for those sites where delay of a 2-mile (3.2-kilometer) radius evacuation is necessary, pending support setup. The licensee would base the recommendation on the agreement and would not confer with OROs on this matter before making the initial PAR.</p> <p>Note 8 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.</p>	<p>Utilities should focus on assessing the potential for, or actual release of radiation from the facility. Whether or not the evacuation support is in place or if impediments to evacuation exist, should not be a utility concern. That is an ORO responsibility for all emergencies, including radiological events. It is impractical, if not impossible to provide evacuation impediments to the utility in a timely manner that would benefit the PAR decision making process. This process should be removed from the PAR Logic Diagram.</p>
<p>3.1 Heightened Preparedness Heightened preparedness should be formally established as a protective action. The alert and notification that occur by sounding sirens (or other alerting devices) and broadcasting EAS messages initiates the implementation of a heightened preparedness for those within the EPZ. Public information materials should describe the concept of heightened preparedness, introduced in this update to Supplement 3.</p> <p>3.3 Staged Evacuation Staged evacuation, introduced in this update to Supplement 3, is the preferred initial protective action in response to a General Emergency because it is more protective of public health and safety than other actions (NRC, 2007). In a staged evacuation, those closest to the plant (i.e., within 2 miles (3.2 kilometers)) are evacuated first, while others shelter. The evacuation is later expanded as necessary. Public information materials should explain that the purpose of staged evacuation is to allow those directed to evacuate to do so in an unimpeded manner. A key message in the material should inform residents not in the evacuation area to stay off roadways to allow the initial evacuation to proceed. Those asked to shelter-in-place or to implement heightened preparedness should prepare for the possibility of evacuation, should it be necessary.</p>	<p>As new concepts to the current PAR/PAD options the integration of this option should not be initially established as a protective action. It should be implemented over time to ensure that appropriate educational materials for the OROs as well as the general public can be developed. It will also take time to integrate into established protective action procedures and changes made to current ORO plans, policies, procedures and public messaging.</p>

NUREG-0654 Language/Reference	Comment
<p>3.4 School Evacuation</p> <p>Research shows that people prefer to evacuate as a family unit, and some parents will attempt to pick children up from school (NRC, 2008b). Emergency preparedness professionals should recognize that, through the immediacy of cell phone communication among children, parents will likely become aware of an impending school evacuation before buses are mobilized. This early awareness may result in large numbers of parents picking up their children. It is suggested that this sensitive issue be addressed with a two-fold approach.</p> <ul style="list-style-type: none"> • The initial expectation of most OROs is that schoolchildren will be evacuated. Public informational materials and other communications with parents of children in public schools should discuss the benefits of allowing schools to implement these evacuation plans without interference. It may be appropriate to explain that parental interference may impede the evacuation process and thereby increase risk to all students during an emergency. The materials should clearly describe the evacuation process for schools and the locations where parents can find their children. • Although the initial expectation of OROs may be to evacuate schoolchildren, parents will arrive and will remove their children from school. This is potentially difficult to manage in an emergency; however, school evacuation planning should accommodate parents picking up children. This may include developing an expedient means to release children to parents, friends, or relatives, and may also include provisions to manage additional traffic. 	<p>One of the incentives to have residents come to the Reception and Care Centers is reunification with their children. It is irresponsible to encourage parents to come to their children's schools to pick up their children. Not only does it impede the evacuation of the school, it unnecessarily exposes the other children to potential exposure while school officials are attempting to accomplish parent/child reunification. The schools have a legal responsibility and potential liability to make sure that children are returned to their legal custodians/guardians. It would be better to perform this at a Reception and Care Center outside the area with a potential for radiological exposure so that it can be accomplished in a safe and orderly manner. It has been the practice of the ORO to encourage reunification at the Reception and Care Center and discourage parents from picking their children up at school. This should be removed from the Supplement.</p>
<p>4.1 Initial Alert and Notification</p> <p>The requirement for a prompt initial alert and notification message to the public is provided in 10 CFR 50.47, "Emergency Plans," with additional guidance included in NUREG-0654/FEMA-REP-1, Revision 1 (NRC, 1980). The intent of the initial notification is to use a scripted EAS message to bring awareness to the public that there is an incident at the nuclear power plant. It is important that emergency response instructions be consistent within the EAS message, and EAS messages should be reviewed for consistency with public information materials (FEMA, 2002). For instance, when a telephone number is included in an EAS message for residents to use to obtain additional information, the EAS message should not ask residents to refrain from using the telephone. Likewise, the public information material should not ask residents to refrain from using the telephone if a phone number is provided in the EAS message. Such contradictory information should be clarified or omitted.</p>	<p>Most EAS message limits range from 1:30 to 2:00 minutes in length. It is difficult to create messages that provide clear, concise, and consistent with public information materials. The inclusion of heightened awareness, staged evacuation, and shelter-in-place messaging as well as information for special assistance groups and parent reunification from schools may exceed the time limit available. As with heightened preparedness and staged evacuations, these new concepts to the current PAR/PAD options should not be initially established as a required messaging. It should be implemented over time to ensure that appropriate educational materials for the OROs as well as the general public can be developed.</p>

NUREG-0654 Language/Reference	Comment
	No timeline has been established for implementation of the changes included in NUREG-0654/FEMA-REP 1, Rev. 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies.