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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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Government Agency Type: Local

Government Agency: County EMA

General Comment

August 7th, 2010

NRC-2010-0080 - NUREG 0654/FEMA REP 1, Rev.1, Supplement 3 comments:

- Palm Beach County is a host county for the St Lucie Nuclear Power Plant. This agency practices an 'all hazards' approach to emergency management. My comments are as follows:
 - o I support all 4 comments and the recommendation that were published in the NJ DEP letter dated April 21st, 2010. I particularly agree with:
 - Comment #3 regarding the timing of this proposed NRC rule and the release of the 2010 census in relationship to requirements for evacuation time estimate studies, and
 - Comment #4 regarding DHS/FEMA involvement in this process - There seems to be a conspicuous lack of commentary and dialogue of the issues by DHS/FEMA in this process; especially at the local level. It appears that NRC is dictating to the OROs via plant operators/utilities.
 - o The Florida REP Task Force held its annual meeting on July 19th-21st, in Tampa. I was fortunate to be able to participate in the NRC public meeting that was also held in Tampa on the evening of July 21st. I spoke publicly the NRC meeting about the term "heightened awareness". Essentially my comments were that this new term "heightened awareness" needs to be simplified because nobody will understand it. I recommended something like "stay informed" as an alternative term. In fact I really wanted to elaborate on my comments further, but failed to do so at that time. So my elaboration is that government officials should endeavor to keep every protective action message/instruction as simple as possible. In that regard, "heightened awareness" or "stay

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Add = B. Sullivan (RXS3)

informed" should always be a general standing order during an emergency; not a new protective action. Consider my rationale; the words evacuate and shelter, are verbs, hence they are actions. That's simplicity. Panicked people will know what those terms mean. "Heightened awareness" however, is a state of being which I believe would be best described by as an adjective. That's too confusing to be a protective action for panicked people during an emergency. I strongly recommend that the use of term "heightened awareness" be stricken as a new protective action.

o During the Tampa meeting I heard a panel member use the word "hope" three separate times. With all due respect, as an emergency manager, I found that the use of hope as a concept in relationship to a critical NRC planning document to be somewhat disturbing. I've often heard the cliché that 'hope is not a plan'. I don't use the concept of hope in my professional planning and I would expect that neither would the NRC.

o I heard it stated by the NRC panel members that this is a guidance document, however I heard it stated by a senior utility operator that it's language is strikingly similar to regulatory compliance language. More needs to be done to rectify that differential.

o Despite all the studies, I don't believe that staged evacuations will be achievable. That concept needs to be reconsidered.

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