

# PUBLIC SUBMISSION

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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

**Document:** NRC-2010-0080-DRAFT-0043

Comment on FR Doc # 2010-11842

## Submitter Information

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**Submitter's Representative:** Richard J. Watts

**Organization:** Office of Emergency Management

**Government Agency Type:** Local

**Government Agency:** Monroe County

8/08/2010  
 75 FR 10524  
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## General Comment

Comments Submitted by Monroe County Office of Emergency Management Regarding Proposed NUREG-0654 Supplement 3.

## Attachments

**NRC-2010-0080-DRAFT-0043.1:** Comment on FR Doc # 2010-11842

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SOUSI Review Complete  
 Template = ADM-013

E-RTDS = ADM-03  
 Add = R. Sullivan (RXS3)



*Office of Emergency Management*  
Monroe County, New York

**Maggie Brooks**  
*County Executive*

**Mary Louise Meisenzahl, MPA, CEM®**  
*Administrator*

August 6, 2010

Ms. Cynthia K. Bladey  
Acting Chief, Rulemaking and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: NUREG-0654/FEMA-REP, Rev. 1, Supplement 3, Guidance for Protective Action Recommendations for General Emergencies as published March 8, 2010 for public comment.

Dear Ms. Bladey:

The Monroe County Office of Emergency Management submits comments on the draft NUREG-0654 Supplement 3, that result from our review of the main Supplement 3 draft document, the supporting Sandia studies, and from recent discussions with our local and state government partners and the licensee.

Our principal concerns are:

**RE: Supplement 3**

Monroe County assessment: The proposed Supplement 3 blurs the respective roles of the licensee and offsite response organizations (OROs) by requiring the license to assess offsite conditions for impediments before making a Protective Action Recommendation (PAR) at a General Emergency. Monroe County strongly disagrees with this approach. The assessment of offsite conditions is a long-established responsibility of OROs, and Monroe County firmly believes licensee recommendations should be based upon the science of known onsite conditions including the status of the plant and radiological releases.

In our role as protective action decision-maker, only the ORO has authority and resources to evaluate offsite conditions. In addition, we are concerned that any requirement that compels the licensee to assess offsite conditions will delay the timeliness of licensee PARs and adversely impact the subsequent ORO implementation of protective action decisions.

Monroe County position: We urge the NRC to remove the language in Supplement 3 requiring the licensee to assess impediments before making a PAR.

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Ms. Cynthia K. Bladey  
August 6, 2010  
Page 2

**RE: Implementing Schedule**

Monroe County assessment: Based upon our review of the proposed Supplement 3 technical details, we are concerned about requirements and the timing of NRC's intended final implementation of Supplement 3 requirements. Specifically, the Federal Register notice for Supplement 3 (Vol. 75 No. 44 dated March 8, 2010) indicates that licensees will be required to implement the guidance by mid-2012. Many of the PAR-related planning elements contained in Supplement 3 will be based upon revisions to site-specific Evacuation Time Estimate studies (ETEs). It is unlikely that these revisions will be available by mid-2012. Revisions of ETEs must be based upon the availability of 2010 Census data and upon methodologies dictated by new ETE rulemaking requirements. Neither is finalized at this time.

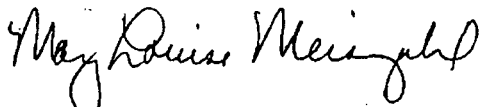
Monroe County position: We recommend that NRC implementation timelines/schedules allow time to coordinate with FEMA guidance, revise documents and train both licensee and ORO personnel.

**RE: Specific Issues Identified by the New York State Department of Health**

Monroe County concurs with the comments regarding the proposed Supplement 3 document that were provided to the NRC by the New York State Department of Health on August 6, 2010.

Thank you for your consideration. If you need additional information, please contact me.

Very truly yours,

A handwritten signature in cursive script, reading "Mary Louise Meisenzahl".

Mary Louise Meisenzahl  
Administrator