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Subject: FW: NRC Rule Making Implementation Timeline.
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Importance: High

I wanted to share with you my thoughts on the proposed NRC rule implementation timeline. Any feedback is appreciated.

NSIR/DPR-ISG-01 Comments on REP Program changes and implementation dates proposed by NRC.

1. The proposed timeline for backup/redundant ANS is not consistent with the new FEMA IPAWS (Integrated Public Alert Warning System) which is scheduled to be operational on the third quarter of 2012. Once the FEMA IPAWS is operational states are required to integrate their ANS into IPAWS and implement the next generation EAS which will take about a year to complete.

The FEMA CMAS (Commercial Mobile Alert System) is currently in development and the FCC rules establishing the CMAS require an end-to-end architecture, in which a Federal Alert Aggregator/Gateway would receive, authenticate, and format alerts received by Federal, state, tribal, and local government agencies and then transmit them over a secure interface to gateways administered by participating CMS providers. The CMS providers would, in turn, process the alerts and transmit them to their subscribers' mobile devices. The gateway is required to be established by April 7, 2012 and once that is complete OROs can begin to build out the interface for backup ANS. The implementation of the backup/redundant ANS should be early 2014 to allow the systems to be integrated into IPAWS and consistent with the IPAWS implementation timeline.

2. The implementation dates for HAB evaluated exercises is too inflexible. State and local jurisdictions already have required demonstration criteria that must be done between now and the proposed implementation dates for HAB exercises and the timeline does not allow sufficient time for implementation.

In order for Minnesota to comply with the required cycle for demonstrating the criteria we already have to, we would need to have our first evaluated HAB exercise July 10th 2012 and that is not sufficient time to integrate plans and procedures, complete training, validate plans and procedures through drills and functional exercises.

I would propose that the utility, state and locals jurisdictions must have an approved 8 year exercise cycle demonstration timeline established within a year of the rule adoption and that HAB exercises must be completed as soon as practicable in the 8-year schedule. This would allow for discussion and negotiation of currently scheduled demonstration criteria and would allow us to re-prioritize criteria to be demonstrated and allowing the earliest

possible implementation of HAB exercises.

The key is developing and gaining approval of a new 8-year cycle for demonstration of all required items and then implement the schedule. Minnesota would be more likely to implement the HAB exercises in 2013 and 2014 if we can move our ingestion exercise back two years, If we cannot move our ingestion exercise back two years then our first HAB exercise must be in 2012 and we will not be ready with the plan and procedure enhancements and the training needed for a successful exercise.

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