

October 13, 2011

W. Craig Fugate, Administrator  
Federal Emergency Management Agency  
U.S. Department of Homeland Security  
500 C Street SW  
Washington, D.C. 20472

Attention: Rulemaking and Adjudications Staff

Subject: October 2011 FEMA REP Manual

Dear Administrator Fugate:

IEMA provided comments on Supplement 4 to NUREG-0654 and the FEMA REP Program Manual in October 2009. Since that time, IEMA has been fully engaged with the numerous public meetings, webcasts and other forums where input has been solicited on these and other emergency preparedness documents undergoing review as we have a very extensive program and work with more nuclear power plants than any other state. Although we appreciated the opportunity to comment on these draft documents, we have the following additional comments and questions because we feel these revisions will greatly impact our programs:

- 1) We strongly urge that implementation of the FEMA REP Manual be delayed until a complete revision to NUREG-0654 is implemented to ensure consistency. Section II of the REP Planning manual represents a defacto attempt to revise NUREG-0654. Additionally, we highly recommend that final approval wait until after all stakeholder issues are resolved.
- 2) Since the October 2011 revision did not include how stakeholder comments were adjudicated, we would request that stakeholders be given the opportunity to review comments made by other entities and how those comments were addressed. When the comments are made available, stakeholders will need additional time to review the impact of these revisions and provide comments.
- 3) It is very unclear as to which parts of these documents are policy and procedure and which parts are guidance. It is our understanding that these documents are guidance. If that is the case, then the use of "shall" is not appropriate in these documents.
- 4) The information about implementation of the documents is unclear. Will the implementation be region by region or by headquarters? We believe that implementation should be at headquarters level to ensure consistency throughout the country.



- 5) The reference to HSEEP is also very unclear. Supplement 4 to NUREG-0654 and the FEMA REP Manual imply that HSEEP is incorporated into the documents. However, it appears as if only certain portions of HSEEP are incorporated, and not those parts that have to do with evaluation. IEMA continues to strongly believe that HSEEP can not be implemented into the REP Program until 44 CFR 350 is revised.
- 6) There a couple of new criteria and revised sections of existing criteria that were added to the October 2011 version that were not part of the 2009 version and stakeholders did not have the opportunity to comment on these.
- 7) The definition of "full-scale" needs clarification. After the clarification, stakeholders need additional time to review the impact.

IEMA is very proud of our programs to ensure the health and safety of the citizens of Illinois. In order to continue to provide the best protection possible, we hope our comments and concerns are addressed.

Sincerely,

  
Joseph G. Klinger  
Assistant Director

cc: James Wiggins, NRC  
NSIR  
TWFN, MS - 4D22A

Scott Morris, NRC  
NSIR/DPR/DDIR  
TWFN, MS - 4A43

Mark Thaggard, NRC ✓  
NSIR/DPR/DDEP  
TWFN, MS - 3B46M

Allan Barker, NRC Region III  
2443 Warrenville Road  
Suite 210  
Lisle, Illinois 60532-4352

Ruth McBurney, CRCPD  
1030 Burlington Lane, Suite 4B  
Frankfort, KY 40601