

PRM-50-104
(77FR25375)

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275

PUBLIC SUBMISSION

Docket: NRC-2012-0046
Petition for Rulemaking Submitted by Nuclear Information and Resource Service and Multiple
Co-Petitioners - Expansion of Emergency Planning Zone

Comment On: NRC-2012-0046-0003
Emergency Planning Zone; Notice of Receipt and Request for Comment

Document: NRC-2012-0046-DRAFT-0179
Comment on FR Doc # 2012-10314

DOCKETED
USNRC

July 17, 2012 (1:35 pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Submitter Information

Name: Jacqueline Vaughan
Address:
175 Main Street
Prince Frederick, MD, 20678
Organization: Public Safety
Government Agency Type: Local
Government Agency: Calvert County Government

General Comment

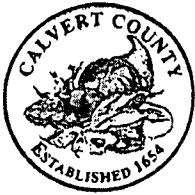
See attached file(s)

Attachments

SKMBT.NRCletter

Template = SECY-067

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**CALVERT COUNTY
DEPARTMENT OF PUBLIC SAFETY**

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Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

July 16, 2012

ATTN: Rulemakings and Adjudications Staff:

REFERENCE:

U.S. Nuclear Regulatory Commission: Notice of Public Comment on Petition for Rulemaking (PRM), dated February 15, 2012; In Response to Petitioner's Request that NRC amend its regulations to expand the Emergency Planning Zones (EPZs) for nuclear power plants.

CITATIONS:

Document Citation: 77 FR 25375

Docket Number: NRC-2012-0046

Docket Name: Petition for Rulemaking Submitted by Nuclear Information and Resource Service and Multiple Co-Petitioners - Expansion of Emergency Planning Zone

Gentlemen and Ladies:

Calvert County Government hereby wishes to comment on the referenced petition and the prospective rule change. We have reviewed the petitioner's request and believe that the request is unjustified and would cause a significant fiscal burden to the county. In addition, extending the respective emergency planning zones for the nation's commercial nuclear power stations should be reserved until after additional reviews are completed and scientific analysis has been fully examined and satisfied by the U.S. Nuclear Regulatory Commission, other supporting federal agencies, and any credible third party interests.

The proposed rule change would cause undue hardship on Calvert County Government, and most importantly the residents of Calvert County. Calvert County is the smallest county in the state of Maryland (geographically) with a population of approximately 98,000 citizens; the proposed 25 mile EPZ encompasses all of Calvert County.

The expansion of the 10 mile EPZ to a 25 mile EPZ would mean Calvert County, at a minimum, would have to address the following issues:

1. Our operations/EOC would need to be relocated outside of the county.
2. Calvert County would no longer have the ability to provide a mass-care/reception center within its geographical boundaries.
3. The current evacuation routes and Estimated Time of Evacuation (ETE) would require changes to accommodate the increase in population.

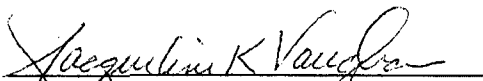
4. Additional staffing would be required to operate traffic and access control points.
5. Additional staffing would be required at the mass-care/reception center.
6. The current Siren system utilized by Calvert Cliffs Nuclear Power Plant would have to be expanded to cover the areas of Calvert County that will be added to the EPZ.
7. The emergency worker monitoring and decontamination site would have to be relocated outside of the county.
8. Planning and guidance documents would all require modifications to comply with the proposed rule change.
9. Because the 25 mile EPZ would encompass the entire county, some governmental offices and support agencies would have to relocate outside of the county. This includes the accident assessment center operated at the CENG Joint Information Center and Emergency Operations Facility in Prince Frederick, MD.


The information listed above is just a brief overview of the potential hardships we would face if the proposed rule change were accepted by the NRC. The fiscal impact on Calvert County Government and the citizens it serves would be catastrophic. Calvert County does not have the financial means, staffing or resources to support this proposed rule change.

To date, Calvert County has experienced over 30 years of safe and successful nuclear power generation at Calvert Cliffs Nuclear Power Plant (CCNPP), which is operated by Constellation Energy Nuclear Group (CENG) in Lusby, MD. It should be noted that this was also the first commercial fixed nuclear facility in the nation to have its license renewed by the NRC.

While that history is commendable, we appreciate the public's concern and perception regarding life safety issues and will take all practical steps to ensure that appropriate systems are put in place and implemented to enhance the safety of the public on behalf of the citizens of Calvert County, MD. In that regard, the agencies of Calvert County Government will continue to support the utility and, moreover, undertake any efforts to improve the safety and wellbeing of individuals who might be at risk of a radiological emergency at the Calvert Cliffs Nuclear Power Plant.

Sincerely,


Jacqueline K. Vaughan, Director
Department of Public Safety


John R. Fenwick, Division Chief
Division of Emergency Management and Safety

Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, July 17, 2012 8:47 AM
To: Rulemaking Comments
Subject: Comment on PRM-50-104
Attachments: NRC-2012-0046-DRAFT-0179.pdf

Van,

Attached for docketing is a comment from Jacqueline Vaughan, Calvert County Department of Public Safety, on the above noted PRM that I received via the regulations.gov website of July 16, 2012.

Thanks,
Carol