

**PRM-50-104
(77FR25375)**

PUBLIC SUBMISSION

As of: July 17, 2012
Received: July 16, 2012
Status: Pending_Post
Tracking No. 8109ce6f
Comments Due: July 16, 2012
Submission Type: Web

276

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

DOCKETED
USNRC

July 17, 2012 (1:35 pm)

Document: NRC-2012-0046-DRAFT-0180
Comment on FR Doc # 2012-10314

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Submitter Information

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Organization: St. Lucie County Public Safety & Communications

Government Agency Type: Local

General Comment

See attached file(s)

Attachments

Comment for Docket ID NRC-2012-0046

Template=SECY-067

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Submission to the National Registry for Public Comment on **Docket ID NRC-2012-0046**

St. Lucie County Department of Public Safety & Communications, Division of Emergency Management appreciates the opportunity to provide comments on the Petition for Rulemaking (PRM-50-104 or Petition) noticed in the Federal Register on April 30, 2012. The petition was filed with NRC by Mr. Michael Mariotte and was dated February 15, 2012. The petition was filed on behalf of the Nuclear Information and Resource Service (NIRS) and 37 co-petitioners. In short, the petitioner requests the NRC amend its regulations to expand the Emergency Planning Zones for nuclear power plants in the United States.

The Department of Homeland Security (DHS) policy and initiatives has provided a solid basis for implementing the ad hoc expansion of Protective Actions for nuclear power plant emergencies as described in the planning basis, NUREG-0396. State and local response organizations have always recognized the possibility that actions may be warranted beyond the established EPZs. In many cases, these issues have been addressed within drills and exercises.

The development and implementation of National Incident Management System (NIMS)/ Incident Command System (ICS) under the National Response Framework (NRF) enhances response capability and provides additional resources to facilitate prompt and effective protective measures for all populations that may be affected. As a result of the NRF and NIMS, the response community throughout the United States continues to be better equipped, better trained and better prepared. These significant strides in the roles, responsibilities and resources provide a mechanism for state, county, local and tribal response organizations to expand response beyond the established zones with few, if any, logistical hurdles.

While NUREG-0396, December 1978 established the current Emergency Planning and Ingestion Pathway zones (EPZ), the expansion and application of an "All Hazards" approach has significantly enhanced the ability of REP planners and responders to coordinate with neighboring communities that lie beyond the EPZ. The "All Hazards" approach allows for ease of scalability, thereby allowing response activities to quickly expand or contract based upon the circumstances.

The Post-Katrina Emergency Management Reform Act directed organizational, mission, and policy changes to respond to these findings and challenges. In addition, the Homeland Security Presidential Directive 5 (HSPD-5): Management of Domestic Incidents, the Presidential Policy Directive / PPD-8: National Preparedness and Public Law (PL) – 110-53 – Implementing Recommendations of the 9/11 Commission Act of 2007 have all had a profound impact on radiological emergency preparedness and response at federal, state and local levels. All of these federal policies have been implemented in Florida. The local jurisdiction's level of knowledge and expertise in "All-Hazards" emergency management and response has grown exponentially at all levels.

Based upon implemented changes from the Post 9-11 and Post Katrina initiatives, the REP community in Florida exceeds the necessary resources and protocols to expand Protective Actions beyond the current EPZs in order to reduce public health risks from radiation exposure. Therefore, if the Nuclear Regulatory Commission (NRC) is even considering expanding the EPZ they should base their decision on science and not from the hysteria that came from the media.

Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, July 17, 2012 8:51 AM
To: Rulemaking Comments
Subject: Comment on PRM-50-104
Attachments: NRC-2012-0046-DRAFT-0180.pdf

Van,

Attached for docketing is a comment from Kurt Myers, St. Lucie County Public Safety and Communications, on the above noted PRM that I received via the regulations.gov website on July 16, 2012.

Thanks,
Carol