

# PUBLIC SUBMISSION

<b>As of:</b> November 27, 2012
<b>Received:</b> November 21, 2012
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1jw-823x-pkpq
<b>Comments Due:</b> November 21, 2012
<b>Submission Type:</b> Web

**Docket:** NRC-2012-0248  
Draft Emergency Preparedness Frequently Asked Questions

**Comment On:** NRC-2012-0248-0001  
Draft Emergency Preparedness Frequently Asked Questions

**Document:** NRC-2012-0248-DRAFT-0006  
Comment on FR Doc # 2012-25929

*10/22/2012*  
*77FR 64562*  
*(2)*

## Submitter Information

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**Government Agency Type:** Local  
**Government Agency:** Calvert County Government

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## General Comment

See attached file(s)

The attached document reflects support to have the effective date of implementation be pushed back to December of 2014.

## Attachments

NRC Comments November 21, 2012

*SUNSI Review Complete*  
*template = AD M-013*

*REIDS = ADM-03*  
*all = R. Wray (rgw2)*



**CALVERT COUNTY  
DEPARTMENT OF PUBLIC SAFETY  
EMERGENCY MANAGEMENT AND SAFETY DIVISION**

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November 21, 2012

Ms. Cindy K. Bladey  
Chief, Rules, Announcements, and Directives Branch (RADB)  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Comments on Emergency Preparedness Frequently Asked Question (EPFAQ) No. 2012-005 (Federal Register 77 FR 64562, dated October 22, 2012; Docket ID NRC-2012-0248) **Project Number: 689**

Dear Ms. Bladey,

As an Offsite Response Organization, the Calvert County Division of Emergency Management under the Department of Public Safety appreciates the opportunity to provide comments on EPFAQ 2012-005 Draft Response (ML12289A692) published in the subject Federal Register notice. Calvert County Emergency Management is an organization responsible for establishing response planning on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues.

The proposed implementation of NUREG-0654, Supplement 3 in 2013 presents a significant challenge to industry and our organization. The implementation date of December 2013 is more restrictive than the reasonable timeframe granted for the hostile action based regulation changes. The process of revising protective action strategies requires considerable revision of ORO procedures and training of decision-makers. As proposed, this effort will occur concurrently with the implementation of two other rule issue areas that also require extensive coordination with the facility in our jurisdiction, procedure changes and training, yet, be implemented several months earlier. The two other issue areas are:

- Licensee coordination during hostile actions (implementation by June 23, 2014) and,
- Implementation of a hostile action scenario in a biennial exercise (implementation by December 31, 2015)

Calvert County recommends closer alignment of implementation dates for efforts that require ORO coordination to facilitate more efficient use of limited ORO and licensee resources to effect these changes.

To this end, Calvert County proposes an alternative implementation date of December 23, 2014, for NUREG-0654 Supplement 3 that would mollify the resource challenge and better align implementation of the revised protective action guidance with the rule change areas that require extensive coordination with the industry. Calvert County further recommends that demonstration of revised protective action procedures be accomplished in the first scheduled biennial exercise following the proposed December 23, 2014 implementation date.

Thank you in advance for consideration of these comments. If you have any questions or require additional information, please contact Bobby Fenwick at (410) 535-1600 x2301 or [fenwicjr@co.cal.md.us](mailto:fenwicjr@co.cal.md.us)

Sincerely,

John R. Fenwick