



COUNTY OF SAN DIEGO

1811 JOHN TOWERS AVENUE
EL CAJON, CALIFORNIA 92020
(714) 448-4611
(714) 579-4461

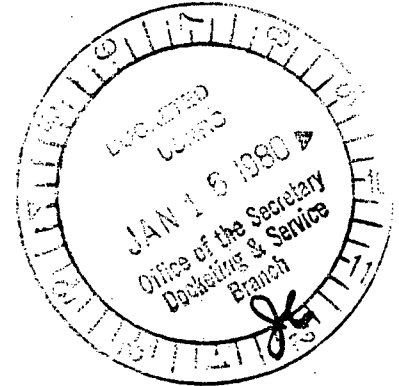
OFFICE OF DISASTER PREPAREDNESS AND FIRE SERVICES

January 8, 1980

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Commission Members



With the San Onofre Nuclear Power Plant located within the boundaries of the County of San Diego, the Board of Supervisors of this County and the emergency response staff are keenly interested in the health and safety of the citizens of San Diego. Obviously the Three Mile Island incident caused a higher level of awareness of the potential and severity of a nuclear incident.

The protection of life and property is an ongoing activity for local government. However, dealing with a nuclear incident is somewhat amorphous in nature. Elected officials, emergency response staff and citizens understand a wildland fire, a flood or an earthquake. But they don't have a clear picture of a nuclear incident. Terminology is foreign, and experts do not agree about the severity of the impact of exposure to various levels of radiation. From the point of view of local government, the three most important aspects that will assist local government in bridging the gap between responding to the traditional emergencies and responding to a nuclear incident are discussed below:

1. Training for elected officials and emergency response personnel including staff of the emergency operating center to teach them how to determine the severity of a nuclear incident and how to cope with the problems of that type of incident. A training program should address the particular needs of each group dealing with the problem.

Acknowledged by card *llc*

A

8002010012

2. Early warning that an alert emergency exists is critical to a quick and effective response by local government.
3. An air monitoring device is needed to track radiation. San Diego County staff has the ability to provide meteorological analysis and that staff in conjunction with private industry can provide air sample analysis. Thus emergency response can be guided by the site specific data and avoid undo evacuation or other overreaction which could be costly and could cause other problems.

Having noted three areas of need to bring nuclear incident responses "up to speed" with other types of more conventional emergency responses, comments will be offered on the NRC proposed rule changes.

1. Require an NRC licensee to shut down a nuclear power reactor if appropriate State and local emergency response plans have not received NRC concurrence or do not warrant continued NRC concurrence.

Comment: Since it is the responsibility of local government to respond to a nuclear incident it is important that NRC takes into consideration the ability of responsible local agencies to provide for an emergency response. NRC is the controlling point to insure that the owner of the power plant and local government work together to protect the citizens that potentially could be affected by an incident.

Alternative A provides for the evaluative process by the Commission in reaching a determination of the significance of the deficiencies in State and local emergency plans. The Commission still maintains the option of shutting down the reactor. Alternative B appears to be less desirable, although basically not significantly different than alternative A. The automatic shutdown of a reactor without the NRC concurrence with State and local emergency plans does not recognize that perhaps only minor deficiencies exist in the emergency plans and those deficiencies would not endanger the health and safety of the citizens of the area. Waivers are proposed for alternative B to provide flexibility to the Commission to license a reactor when the deficiencies in the emergency plans are minor and will be subsequently resolved.

The involvement by NRC in the review and evaluation of emergency response plans is an integral part of their overall responsibility for the protection of the public health and safety in areas around nuclear power plants.

2. Require that State and local emergency response plans be concurred in by the NRC as a condition of operating license issuance.

Comment: It follows, logically, that the same review process undertaken by NRC for existing licensees in regards to emergency response plans should apply to those who are applying for a license as well. Comments listed above for alternative A and B apply to the issuance of an operating license too.

3. Require extending emergency planning considerations to the emergency planning zones (i.e., within the approximate 10 and 50 mile radii around the plant).

Comment: The plume exposure pathway emergency planning zone for nuclear power plants "shall consist of an area about 10 miles in radius and the ingestion pathway EPZ (emergency planning zone) shall consist of an area about 50 miles in radius."* Striking on arc of 10 or 50 miles from a nuclear reactor is not a useful tool around which to develop an emergency response plan. The topography and meteorology of the area are the variables, not a distance radius. As an example, topography and meteorology for the San Onofre Nuclear Power Plant play a major part in the determination of a local emergency response to a nuclear incident. Weather conditions vary but a probable pattern would be that radiation released from that plant would be drawn offshore and then it would travel in a southerly direction along the coast and then be blown onshore. Depending on weather conditions anyone of a number of populated areas or ingestion pathway areas could be affected.

Effective local emergency response planning needs to be based on the ability to monitor the movement and intensity of the contaminants released into the environment. In the instance of the San Onofre Nuclear Power Plant, contamination of the ocean is a possibility that must be taken into consideration as well.

* Part 50 - Domestic Licensing of Production and Utilization Facilities, Section 50.47 Emergency plans, paragraph (6).

4. Require that detailed emergency planning implementing procedures be submitted to NRC for review.

Comment: Detailed emergency planning implementing procedures puts substance into what can be otherwise a broad general description of an emergency response. Response capability can be better measured by those items listed in paragraphs C through H of alternative B of Appendix E - Emergency Planning and Preparedness for Production and Utilization Facilities, Section II The Preliminary Safety Analysis Report. Those procedures address evacuation, emergency transportation of onsite individuals to offsite treatment facilities, emergency treatment at offsite facilities, training, time and means of notification of State and local governments and other specific matters. Identification of specific procedures and the testing of those procedures every two years will provide the coordination of efforts for the many agencies involved in an emergency response.


The key element missing in even the most sophisticated of emergency plans is the ability to accurately track and monitor radiation once it goes offsite. The best of plans and training cannot make up for the lack of accurate data coming into the emergency response system.

5. Require informing the public and improving support for local emergency response personnel.

Comment: The most direct and thorough way to inform the public about planning for and response to a nuclear incident is by making the printed and electronic media a part of the plan and a part of the operating procedures. As noted in paragraph F. Training of Alternative B of subsection III: The Final Safety Analysis Report of Appendix E, training of local news media persons and inclusion of them in plan exercises is suggested. NRC should provide information to schools and various organizations to educate the public at all age levels on nuclear incidents. This will go a long way to insure accurate data to the public, schools and organizations.

The support given by NRC to local government should be directly related to the needs of local emergency response personnel. NRC should assume the responsibility for public protection and safety beyond concurrence of emergency response plans. It should provide an ongoing training program for local personnel involved in responsibility to a nuclear incident that goes offsite.

That training program must specifically address analysis and interpretation of data and development of tactical strategies to respond appropriately to any perceived danger related to the nuclear incident.


Charlotte Langley, Director
Office of Disaster Preparedness and Fire Services

CL:dj