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Mr. James M. Taylor
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: PROPOSED REVISION 3 TO REGULATORY GUIDE 1.101, "EMERGENCY
PLANNING AND PREPAREDNESS FOR NUCLEAR POWER REACTORS"

During the 388th meeting of the Advisory Committee on Reactor Safeguards, August 6-8, 1992, we reviewed the proposed Revision 3 to Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors." In addition to our discussions with the NRC staff, we also had the benefit of the documents referenced.

Revision 1 to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (NUREG-0654), was published in 1980 to provide specific acceptance criteria for complying with the standards set forth in Section 50.47, Emergency Plans, of 10 CFR Part 50. Appendix 1 of NUREG-0654 contains examples of emergency action levels for each of the four emergency classification levels that are used to initiate different on-site and off-site emergency responses. Revision 2 of Regulatory Guide 1.101 endorsed NUREG-0654, Revision 1.

The purpose of the proposed Revision 3 to Regulatory Guide 1.101 is explicitly to allow the use of the method described in NUMARC NESP-007, "Methodology of Development of Emergency Action Levels," Revision 2, January 1992, as an acceptable alternative method to that described in NUREG-0654.

We believe that the proposed Revision 3 is well conceived and well executed. Public comments were generally favorable. We endorse the issuance of the proposed revision.

Sincerely,

David A. Ward
Chairman

References:

1. U. S. Nuclear Regulatory Commission, Revision 3 to Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," June 1992
2. U. S. Nuclear Regulatory Commission, NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980