

DOCKET NUMBER

PROPOSED RULE

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Washington, D.C. 20555

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Subject : Requested Comments on EMERGENCY PLANS.

According to an Office of Public Affairs Release dated July 20, 1979, and a PR notice dated July 17, the public has an invitation from the NRC to comment on Emergency Planning. This comment period ends 45 days from the PR notice according to the Press Release. I have already sent in a list of people who said that they were interested in commenting. I have reason to believe that of this date the people on this list were not yet supplied the notification of invitation for comments. (My letter of 7-23-79 to NRC.)

I think that this lack of alacrity in supplying needed notification to the interested public demonstrates the NRC's attitude toward involving the public. Commissioner Hendrie statements ~~on~~ on tape concerning First Amendment rights also demonstrates and leads the Staff toward minimizing the role of the public in emergency plans and all matters nuclear.

When I first received the news release on emergency plan comments wanted, I sent of a letter. (7-23-79.) I protested the short comment period. ~~It~~ A sure way to eliminate public comments is a short comment period.

I then reviewed my comments in the past on Regulatory Guides and other subjects which related to emergency plans. As far back as July 1977 in a Part 21 Workshop in King of Prussia, I asked whether an utility could be prosecuted under Part 21 for an Emergency Plan which did not meet the criteria of protecting the health and safety of the public.

I did not get an answer then and I still have not gotten an answer.

On August 20, 1979, I attended a meeting in King of Prussia. This was an NRC Staff meeting with Nuclear Plant Licensees on Emergency Plans.

~~XXXXXXXXXXXX~~

I got up and asked the Staff, "How do you think the public liketh the idea that at 4AM in the morning that their health and safety in a nuclear power ~~Y~~ plant control room is in the hands of a high school graduate or equivalent?"

I was answered, "Well, we are working on it."

I do not believe that this is an adequate answer.

Then Bob Seares of the NRC got up and thru a real fear into me. He stated that at 3 AM in the morning, if an emergency arose, the plant operator would telephone the ~~XXXXX~~ management.

Well, considering the errors and ~~omissions~~ omissions of the Metropolitan Management, the very last thing that I want an operator to do is call the management.



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Several Utility people raised questions about the funding of emergency plans. These questions were neatly sidestepped by the Staff. Finally, one staffer admitted that the utilities may be asked to pay for funding the emergency plans.

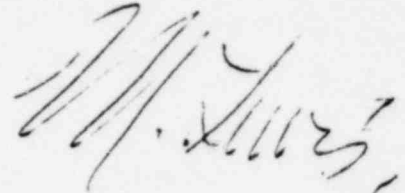
I want it iron bound that the utilities must pay for emergency plans. I have NUREG 0553 , 3/30/79, which pretty much shows that solid funding is necessary for adequate emergency planning. Without iron bound assurances, there cannot be adequate planning.

Finally , local planning is the backbone of Civil Defense. Again and again, wars and disasters have shown that without complete local participation , emergency planning is a farce.

With strong local plans and participation, lives are saved.

Only when the NRC stops treating the public like ~~xxxx~~ a necessary nuisance can emergency planning hope to become effective.

Only when the NRC starts treating the public as a full partner in all decision making can emergency planning become effective.



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