

DOCKET NUMBER
PROPOSED RULE PR - Misc. Notice
Reg. Guide

May 11, 1979



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

Attn: Docketing and Service Branch

Dear Sir:

The reactor operations staff has completed a review of the subject, Regulatory Guide 2.6 "Emergency Planning for Research Reactors" and it is our opinion that the proposed outline for an emergency plan covers all the important parts for this type of document and when fully implemented results in a comprehensive workable plan. We have attached several comments based on our experience using our emergency plan which follows closely your suggested format. Please contact me if you have questions regarding our comments.

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COMMENTS

Regulatory Guide 2.6

Emergency Planning for Research Reactors

	<u>Item</u>	<u>Comment</u>
1.	2.1.1 Personnel Emergency page 2.6-3	The provisions of this section do not appear to be consistent with either the remaining parts of RG 2.6 or 10 CFR 50 Appendix E. These documents imply an overall general plan for coping with on-site and off-site emergencies which would include handling and care of injured and/or contaminated persons but not industrial cases. We concur that a facility should have an <u>industrial plan</u> which does <u>provide for employee treatment</u> but does not need to be a part of the reactor emergency plan except by reference.
2.	7 Recovery page 216-7	This subject should be a separate document and not part of an emergency plan.
3.	8.5 Appendix page 2.6-7	This information is contained in the Accident Analysis section of the approved FSAR and need not be included in the emergency plan. A reference to the FSAR should be satisfactory.

GENERAL COMMENTS:

1. What is the role of ANSI standards relative to Regulatory Guide. In cases of conflict, which document takes precedence (Note: We have no examples of conflict but eventually this will occur and a statement of which document takes precedence should be issued.)
2. The Regulatory Guide assumes a large elaborate complex staffed with ample numbers of people expert in many disciplines. This is generally not the case at a research facility and reactor personnel must rely on available assistance from other organizations and not necessarily assume that the large staff is always available. We concur in all the various aspects of the plan as outlined in Annex A but suggest that the Introductory remarks recommend that assistance be obtained, if needed, from outside the reactor line organization.