



STATE OF FLORIDA

DEPARTMENT OF PROPOSED RULE PR - 50 (44FR41483) ⁵

Bob Graham, Governor

P.O. BOX 15490

ORLANDO, FLORIDA 32858



July 31, 1979

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

Re: Docket 79-22078

Dear Sir:

I consider item 11 of this document to be the basic question which must be addressed before other items can be considered. State and local emergency plans, no matter how elaborate, will not serve any useful purpose when pre-empted by Federal Agencies. To be effective they must be permitted to operate as designed and concurred in. Pathways of communication from Federal Agencies to local governments should proceed in the channels established by pre-planning. Ad hoc revisions can only result in conflicting advice and confusion damaging to the public safety and to public confidence.

It is my opinion that under item 1, the basic objective of emergency planning should be to reduce public radiation exposure. This is already adequately quantified in the form of U.S. EPA Protective Action Guides.

Item 5 - radiological emergency response drills should be a requirement. This is already addressed in NUREG 75/111 as a requirement for Concurrence in State plans.

Item 14 - exposure of the public to the hazards of evacuation for the purpose of response drills is not, in my opinion, a rational action. The total hazard of such evacuation drills over years, would far exceed the potential hazard of a nuclear power plant accident.

In my opinion, the Commission should exercise great restraint to prevent a flood of new rules on the topic of radiological emergency planning. The problem which NRC staff perceives to have arisen from Three Mile Island is not a lack of rules, but rather a lack of serious application of those which exist.

Sincerely,
Wallace Johnson
Wallace Johnson
Chief
Radiological Surveillance
and Laboratory Services

Acknowledged by card... *dth abx*

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