

M. JAMGOCHIAN



DEPARTMENT OF

Bob Graham, Governor

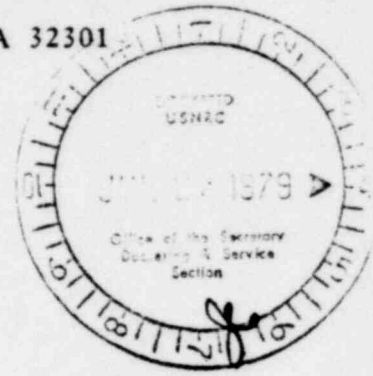
Health & Rehabilitative Services

1323 WINEWOOD BOULEVARD

TALLAHASSEE, FLORIDA 32301

DOCKET NUMBER

PETITION RULE PRM -50-23 (44FR 32486)



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

Attn: Docketing and Service Branch
Re Docket No. PRM-50-23

Dear Sir:

The petition for rule making has been reviewed. The proposal does not appear to be workable in Florida, whatever action is taken by the Nuclear Regulatory Commission. The specific defect occurs in the requirement for evacuation drills involving 55 square miles. It is understood that the petition would require physical evacuation of the population of such area on an annual basis. Utilities in Florida do not appear to have legal authority to evacuate any area not owned by them. Chapter 252 Florida Statutes authorizes the Governor to require evacuation of areas when a disaster has been declared, but there appears to be no legal basis for evacuation for the purpose of drills. We would not support a revision of Florida law to provide for such evacuation drills since the risk imposed upon the population by such evacuation appears to far exceed our perception of the risk imposed by an accident at a nuclear power facility in Florida.

Florida, for a number of years, has conducted annual emergency drills, involving state and local officials, as well as reactor operators, at each of the three nuclear power sites in the state. It is our opinion that the situation in Florida would not be substantially improved by this proposed rule making.

It is recommended that the Commission reject the petition and devote their energies to providing support, fiscal and technical, to the state for improving emergency planning in more realistic areas.

Sincerely,

Uray Clark
Director
Radiological Health Services

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Acknowledged by...

of 7/27/79

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