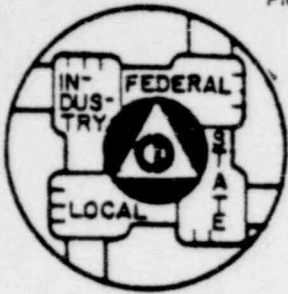


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DOCKET NUMBER PR-50(44FR 41483)
PROPOSED RULE



Racine County
OFFICE of EMERGENCY GOVERNMENT

Safety Building 730 Center Street Racine, Wisconsin 53403
Telephone 414 - 634 - 5331

July 30, 1979

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



Dear Sir:

This is in response to your press release (attached) by which you seek citizen comment pertaining to emergency preparedness plans for areas near a nuclear electric generating plant. You will note that due to my position and responsibilities that my viewpoints may differ from those of the general public, pro and con.

Racine County, Wisconsin, is beyond the ten-mile radius from the Commonwealth Edison Plant located at Zion, Illinois, but portions of the county are within a twenty-mile radius; and, of course, well within the fifty-mile food chain radius.

The questions asked in your press release will be answered in sequence.

1. From reliable information which we have been able to accumulate, prevention of public radiation exposure is out of the realm of realism. However, means of reducing public radiation exposure can be relatively easily accomplished by the two most recognized methods --- distance and mass. If we utilize the existing NRC guidelines for accumulated exposure over a seven-day period, and --- accept recently released information on the actual exposure in Pennsylvania as 25-30 mRem as accurate --- certainly sheltering of the public is far more workable and logical than is mass evacuation. However, true planning and actions for public safety measures should be based on the prompt and reliable reporting of existing and anticipated radiation levels when a nuclear incident/emergency occurs at a nuclear plant. The capability for sheltering or evacuating the public is a matter of planning at the State and local levels.

Acknowledged by card. 8/21/79

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2. An emergency response plan for State and local agencies, and for NRC licensees should consist of general planning and standing operating procedures. For example, the plan may indicate that certain agencies/individuals, by title, will be alerted by the licensee when an emergency or incident has occurred. However, previously developed standing operating procedures, kept current and updated, should describe who does what, when, and how, to insure that such alerting actually takes place. Alerting within the agencies alerted by the licensee should be the responsibility of the agency alerted. Actual response should also be by general plan and standing operating procedures developed by the licensee, and State and local emergency services, in consonance with each other. Municipal, county or State boundaries must be completely disregarded if response is to be assuredly adequate and effective.
3. In my opinion, the continued operation of any nuclear power plant should not be contingent upon NRC concurrence in State and local emergency response plans. Since the locale of each of the nuclear plants dictate wide variation in the response plans and procedures developed, where State and local plans have not been developed concurrence by NRC of newly developed plans could be a lengthy procedure, thus delaying resumption of plant operations for an extended period of time.
4. The question as written is somewhat unclear. However, if the subject license refers to a new plant not yet operating or a plant under construction, then certainly licensing should be contingent upon NRC concurrence in the associated State and local emergency response plans.
5. Since State and local civil preparedness/emergency management agencies have the responsibility for planning for all emergencies, including radiological emergencies, additional financial assistance should not be required for this purpose. However, since a radiological emergency/incident occurring at a nuclear power plant is man-made, and resulting from the failure of safety devices or procedures, --- and, since preparedness in the form of special equipment and specially-trained personnel would not be required were it not for the subject nuclear power plant --- these expenses and financial assistance for same should be borne as a loss to the operating utility and directly affecting the corporation's profit or loss to the stockholders.
6. Radiological emergency response drills should be a requirement. It is only by periodic drills that response can be tested for adequacy and currency.

7. Public information releases pertaining to actions to be taken by the public in the event of a nuclear power plant emergency/incident should be in the same forms (printed material, news media articles and broadcasts, etc.) as are used for tornado, hurricane, flood, winter storms and the like. If these methods are adhered to as diligently and conscientiously for nuclear power plant emergency/incident as for the possible emergencies above-mentioned, the public should be informed as well as is humanly possible.
8. A nuclear power plant licensee should notify NRC at least of incidents which occur within their plant, and from which there is no prospective hazard outside the confines of the plant. However, an incident which could even remotely cause a hazard to the public should be reported to Federal, State and local agencies with emergency responsibilities. At this time, also, the Federal, State and local agencies should be fully briefed on the situation, including the prospective hazard and prospective radiation levels. At any time there is danger to the welfare of the public, the public should be totally informed as to what the danger is, if any, and what specific actions should be taken by them for their welfare.
9. Federal radiological emergency response planning should reflect no less concern that the concerns of State and local governments, since Federal agencies have no less responsibility for the welfare of the public than do State and local governments.
10. During nuclear power plant emergencies Federal agencies, State and local governments, and the licensee should become a common committee, kept totally informed on the actions being taken or planned, and totally involved in decisions relating to the emergency.
11. Training in radiological detection and response is presently available to State and local government personnel through FEMA/civil defense channels. Since this training is now provided through the Federal government, it remains simply for the Federal government to continue this service. The real inadequacies exist in the instrumentation available to local government response personnel.
12. The assessment of actual or potential consequences of a nuclear power plant accident should be a joint effort by Federal, State and local governments, and the licensee. Expertise for reliable assessment should be developed among each, and responsibility borne by each.

Secretary of the Commission
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13. Public participation in radiological emergency response drills is totally impractical. Liabilities involved would be beyond imagination. Reliance should be placed on public education and emergency public information.

Sincerely,

Nickolas H. Braun

Nickolas H. Braun, Coordinator
Racine County Emergency Government

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enclosure

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POOR ORIGINAL

2B the Journal Times, Wednesday, July 25, 1979
Racine, Wis.

Nuclear Commission seeks citizen advice

The federal Nuclear Regulatory Commission (NRC) is seeking comments from citizens to help in preparing stricter emergency preparedness plans for areas near a nuclear plant.

The rules would involve the nuclear plant utilities, local and state governments, and the NRC.

The Three Mile Island Nuclear Power Station accident March 28 has prompted the NRC to seek citizen comments, according to a press release.

The NRC wants to know:

"1. WHAT should be the basic objectives of emergency planning? Reduce public radiation exposure? Prevent public radiation exposure? Capability to evacuate the public?

"2. WHAT constitutes an effective emergency response plan for state and local agencies and for NRC licensees?

"3. SHOULD NRC concurrence in the associated state and local emergency response plans be a requirement for continued operation of any nuclear power plant?

"4. SHOULD prior NRC concurrence in the associated state and local emergency response plans be a requirement for the issuance of any new operating license for a nuclear power plant?

"5. SHOULD financial assistance be provided to state and local governments for radiological emergency response, planning and preparedness? What should be the source of the funds?

"6. SHOULD radiological emergency response drills be a requirement? Under

whose authority?

"7. HOW and to what extent should the public be informed prior to any emergency, concerning emergency actions it might be called upon to take?

"8. UNDER what circumstances and using what criteria should a licensee notify state, local, and federal agencies of incidents, including emergencies? When, how, to what extent, and by whom should the public be notified?

"9. HOW and to what extent should the concerns of state and local governments be incorporated into federal radiological emergency response planning?

"10. HOW should federal agencies interface with state and local governments and the licensee during emergencies?

"11. SHOULD the licensees be required to provide radiological emergency response training for state and local government personnel? Should the federal government provide such training?

"12. TO WHAT extent should reliance be placed on licensees for the assessment of the actual or potential consequences of an accident? To what extent should this responsibility be borne by federal, state or local governments?

"13. WOULD public participation in radiological emergency response drills, including evacuation, serve a useful purpose?

Comments should be addressed to the Secretary of the Commission, Nuclear Regulatory Commission, Washington, D.C. 20535.