

UNIVERSITY OF NEW HAMPSHIRE
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J. Sam Miller, CCE
Northwood
NH

Secretary of the Comm.
NRC
Washington, DC 20555



Dear Secretary,

Please accept the following
hand written comments in response
to the attached release.

Thank you.

Cordially

J. Sam Miller

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Acknowledged by card... dlh 9/4/79

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UNITED STATES NUCLEAR REGULATORY COMMISSION

OFFICE OF PUBLIC AFFAIRS, REGION I
631 Park Avenue, King of Prussia, Pa. 19406

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Contact: Karl Abraham
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5000

FOR IMMEDIATE RELEASE
July 20, 1979

NRC CONSIDERING ADDITIONAL REGULATIONS ON EMERGENCY PLANS

The Nuclear Regulatory Commission is considering the adoption of additional regulations which would establish, as a condition of power reactor operation, increased emergency readiness for public protection in the vicinity of these facilities; such regulations would involve utility licensees as well as State and Local authorities and the NRC.

The action is one of many being taken by the Commission in response to the March 28 accident at the Three Mile Island Nuclear Power Station and also is responsive to recommendations from the General Accounting Office and requests from a number of organizations including renewed and supplemental petitions for rulemaking from Critical Mass and Public Interest Research Groups.

The Commission is seeking public comment on the following subjects:

1. What should be the basic objectives of emergency planning? *to protect the public.*
Reduce public radiation exposure? Prevent public radiation exposures? *impossible*
Capability to evacuate the public? To what extent should these objectives be quantified? *yes.*
2. What constitutes an effective emergency response plan for State and local agencies and for NRC licensees? What are the essential elements that must be included in an effective plan? Do existing NRC requirements and guidance lack any of these essential elements? *yes... enforcement.*
3. Should NRC concurrence in the associated state and local emergency response plans be a requirement for continued operation of any nuclear power plant with an existing operating license? If so, when should this general requirement become effective? *yes - as soon as possible.*
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? If so, when should this general requirement become effective? *yes, as soon as possible.*

(MORE)

5. Should financial assistance be provided to State and local governments for radiological emergency response, planning and preparedness? If so, to what extent and by what means? What should be the source of the funds? *nuclear power commercial profits tax.* Yes

6. Should radiological emergency response drills be a requirement? If so, under whose authority: Federal, State or local government? To what extent should Federal, State, and local governments, and licensees be required to participate? *So that they all can work together.* Yes

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? *With drills and pre-planned evacuation routes, based on wind conditions.*

8. What actions should be taken in response to the recommendations of the joint NRC/EPA Task Force Report (NUREG-0396/EPA 520/1-78-016)? *I don't have that report, could you send me a copy?*

9. 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 of these incidents? *Based on a signal of radiation released.*

Circumstances where Federal SET radiation limits are exceeded.
The comments received will be collected and evaluated by the NRC staff, which will, in turn, submit recommendations on proposed rules to the Commission. Based on the comments it receives from the public and the analysis of the problem presented by the NRC staff, the Commission will determine whether to proceed with a proposed rule for notice and comment and/or whether to make such rules immediately effective. The Commission anticipates completion of this expedited rulemaking in approximately six months.

The NRC staff is presently conducting a comprehensive review of all aspects of the NRC emergency planning and preparedness program. Therefore, the Commission is also interested in receiving comments on all other aspects of emergency planning, including issues raised in the Critical Mass/PIRG petition for rulemaking and questions such as the following:

10. How and to what extent should the concerns of State and local governments be incorporated into Federal radiological emergency response planning? *we should have one unified plan for all States.*

11. How should Federal agencies interface with State and local governments and the licensee during emergencies? *Federal controls the show.*

12. Should the licensees be required to provide radiological emergency response training for State and local government personnel? If so, to what extent? Should the Federal government provide such training? If so, to what extent? Yes

(MORE)

as set forth in Federal guidelines. Yes

as little as possible

13. To what extent should reliance be placed on licensees for the assessment of the actual or potential consequences of an accident with regard to initiation of protective action? To what extent should this responsibility be borne by Federal, State or local governments? *all Federal*

14. Would public participation in radiological emergency response drills, including evacuation, serve a useful purpose? If so, what should be the extent of the public participation? *See show. - Yes.*

Comments should be addressed to the Secretary of the Commission, Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch within 45 days of publication in the Federal Register on July 17.

(or Aug 31 57)

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I would recommend consideration of the following:

- 1) Public Education programs on public TV stations and in public schools regarding radiation alerts and evacuation alarms. Particular stress on meteorological effects that will influence evacuation routes, fallout and cloud shine intensities and local community responses.
- 2) Local annual drills that include release, smoke and fallout simulations.
- 3) Issuance of Potassium or Sodium iodide pills to the general public within a 10 mile radius of a nuclear site. 1064 254
- 4) Particular training of hospital personnel in treatment of large numbers of radiation casualties and in evacuation routes of the hospital, decision making on evacuation of hospitals within 50 miles of a nuclear site.