



DOCKETED
PROPOSED

(41)
- Misc. Nureg 0610
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General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • (517) 788-0550

December 26, 1979



Secretary of the Commission
Att: Docketing and Service Section
US Nuclear Regulatory Commission
Washington, DC 20555

The following comments regarding NUREG-0610, "Draft Emergency Level Guidelines for Nuclear Power Plants," are presented for your consideration:

General

1. NUREG-0610 provides four classes of Emergency Action Levels intended to replace the emergency classes provided in Regulatory Guide 1.101. NUREG-0610 goes well beyond the scope of Regulatory Guide 1.101 in establishing required actions for not only the licensee, but for state and local authorities also. In doing so, NUREG-0610 is in conflict with several federal and state documents which provide the basis for emergency planning. These documents include:
 - a. NUREG-75/111, "Guide and Checklist for Development and Evaluation of State and Local Governmental Radiological Emergency Response Plans in Support of Fixed Nuclear Facilities," USNRC.
 - b. "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," USEPA.
 - c. "Michigan Emergency Preparedness Plan," Michigan Department of State Police (and doubtlessly, similar documents in other states).
 - d. R 325.5901-.5934, Michigan Department of Health, Peacetime Nuclear Incidents (and doubtlessly, similar documents in other states).

Until NUREG-0610 and the other federal and state regulations are made consistent, it will be impossible for Consumers Power Company to comply with the totality of regulations.

2. NUREG-0610 requires that nuclear plant operators report to state and local officials some events which may not affect safety operation of the plant or the health and safety of the public. Such events include flood, low water, small earthquake, small fires, turbine failures and others. Because state and local officials are responsible for protecting the public from all hazards, not just those from nuclear power, it is appropriate that these officials be allowed to focus their attention on real problems and not be

1773 026

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December 26, 1979

Page 2

distracted by calls from nuclear plants informing them that everything is all right. Therefore, NUREG-0610 could be improved by the addition of a general statement limiting the requirement for notification of state and local authorities to those events which might affect the public health and safety.

3. Consumers Power Company (CPCo) wishes to stress the importance of concurrence to NUREG-0610 by both utilities and state and local organizations. CPCo suggests that NRC distribute copies of NUREG-0610 to the state and local organizations responsible for emergency planning, and that the involved parties strive to define a single set of rules under which all are to operate. The distribution list should include state and local organizations in all counties within the emergency planning zones for the plant.
4. In general, the requirements of NUREG-0610 are not sufficiently definitive. Requirements which are subject to a wide range of interpretation allow too many inconsistencies in application and create a situation in which bickering between regulators and utilities flourishes.

Specific Comments

1. Page 3 - Class Description - This definition is not sufficiently specific. Loss of one redundant piece of equipment degrades the "level" of safety. It should not be considered practical or prudent to report this kind of event to all offsite agencies. More specificity is requested.
2. Page 3 - Licensee Action 1 - Requirements for the notification of the Michigan Department of Public Health are already delineated in R 325.5914. Unless a release in excess of State Incident Class C is anticipated, local officials may not be interested in internal problems at a nuclear power plant. Therefore, NUREG-0610 should establish which requirements take precedence and all parties should strive to ensure that the state and federal requirements are made consistent.
3. Page 3 - Licensee Action 3 - "Assess and respond" should be done prior to Action 2, "Augment on-shift resources."
4. Page 4 - Item 1 - This requirement should apply to automatic initiation of ECCS in response to abnormalities in plant operation only. Incidents such as inadvertent starts due to plant maintenance, operator error and tests should be excluded.
5. Page 4 - Item 3C - This is already covered by Item 3B. The failed fuel monitors provide only an indication of fuel failures and no action should be required until laboratory results have been evaluated. In addition, failed fuel monitors are currently not required in all plants.
6. Page 4 - Item 10 - Suggest changing to, "Fire not brought under control within ten (10) minutes."

1773 027

December 26, 1979

Page 3

7. Page 4 - Item 13 - During natural phenomena, such as those listed, local officials will be occupied with many problems caused by the phenomena. Therefore, they should not be burdened with a report from a nuclear power plant unless something is wrong at the plant. For this reason, it is recommended that this item be deleted. If something were wrong at the plant, it would be covered by the other reportable items listed.
8. Page 5 - Item 14 - Notification should be required only if the incident threatens the health and safety of the public.
9. Page 5 - Item 14E - This requirement needs better definition. It is inappropriate to require all turbine failures to be reported. If the intent of this requirement were clarified, CPCo could evaluate the requirements more accurately and respond accordingly.
10. Page 6 - ReleasePotential - Release limits should be based on a site boundary dose, not a curie limit. These dose potentials and the state limits should be made compatible.
11. Page 6 - Licensee Actions, Item 2 - The extent of the condition should be assessed (Item 3) prior to activating the support centers (Item 2).
12. Page 6 - Licensee Actions, Item 5 - Status updates every 15 minutes is excessive for an alert condition. Offsite authorities should be updated when conditions change significantly, or every hour, whichever is shorter.
13. Page 7 - Item 1C - See comment on Item 3C (#5 above).
14. Page 7 - Items 2 and 3 - A leak rate (gpm) should be specified. It is not possible to accurately assess the number of failed tubes.
15. Page 7 - Item 6 - To which should the factor of 1000 be applied, radiation readings in the containment, or those at the site boundary?
16. Page 7 - Item 9 - Fuel failure is already covered in Item 1; therefore, this item can be deleted.
17. Page 7 - Item 12 - The minimum release of radioactivity for which reporting is required should be quantified.
18. Page 7 - Item 15 - This limit of 1mR in 2 hr is less than that allowed under 10 CFR 20.105 (ie, 2mR in any one (1) hour). It is suggested that the NUREG-0610 limit be changed to 2mR to be consistent with 10 CFR 20.105.
19. Page 7 - Item 16 - The term "compromise" should be defined in order to provide the guidance necessary for consistent interpretation.
20. Page 8 - Item 17 - See comment on Item 13 (#7 above).
21. Page 8 - Item 18A - It is suggested that wording be changed to, "Aircraft crash affecting facility operation."
22. Page 8 - Item 18B - It is suggested that wording be changed to, "Missile

1773 028

December 26, 1979

Page 4

impacts on facility which affect plant operation." as now written, any missile, no matter how insignificant, would have to be reported.

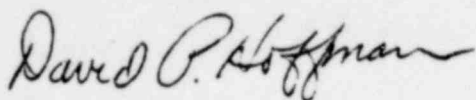
23. Page 8 - Item 19 - It is suggested that wording be changed to, "Precautionary activation of...operations center."
24. Page 9 - Release Potential - See comment on similar item below. The doses which result from the release of 1000 Ci of I-131 are greatly dependent on the meteorological conditions at the time of release. At one of the CPCo plants, calculated site boundary thyroid dose would vary from 1.4 Rem to 230 Rem depending on whether average or 5% meteorology is assumed. In addition, some states base the category of the incident on dose. As a result, the release of 1000 Ci might become an alert, a Site Emergency or a General Emergency depending on the state and meteorology. These potential inconsistencies must be avoided. Therefore, it is suggested that NUREG-0610 establish which requirements take precedence and that all parties strive to ensure that the state and federal requirements are made consistent.
25. Page 9 - State and Local Actions - These actions may conflict with the state emergency preparedness plans. Therefore, NUREG-0610 should establish which requirements take precedence, and all parties should strive to ensure that the state and federal requirements are made consistent.
26. Page 9 - Licensee Action - See previous comment on similar item.
27. Page 10 - Item 3 - See comment on Items 2 and 3.
28. Page 10 - Item 12A - These levels may not be consistent with state rules. Therefore, NUREG-0610 should establish which requirements take precedence, and all parties should strive to ensure that the state and federal requirements are made consistent.
29. Page 10 - Item 14 - See comment on Item 13.
30. Page 11 - Item 16 - It is suggested that wording be changed to, "activation of...public notification."
31. Page 12 - Release Potential - See previous comment on similar item.
32. Page 13 - All Items - These radiation levels conflict with state criteria and EPA recommendations. Therefore, NUREG-0610 should establish which requirements take precedence, and all parties should strive to ensure that the requirements are made consistent. Furthermore, it is suggested that the NUREG-0610 criteria for evacuation be based on the relative magnitude of the risks associated with precautionary evacuation (accidents, heart attacks, etc) and the risks the population would experience by remaining in place and being exposed to the predicted radiation.

1773 029

December 26, 1979

Page 5

Please consider these comments in future actions concerning NUREG-0610.

A handwritten signature in cursive script, reading "David P. Hoffman".

David P Hoffman
Nuclear Licensing Administrator

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1773 030