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Commissioner
JOAN K. LEAVITT, M.D.

December 19, 1979

Robert G. Ryan
Director, Office of State Programs
U. S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear Mr. Ryan:

This is in response to your request for comments on NUREG-0553, Beyond Defense-in-Depth, relating to the cost and funding of state emergency response plans and preparedness.

Our greatest concern at this time lies with the possible impact upon the state's radiation control program in regard to the preparation of an emergency response plan within a greatly compressed time frame as a result of changing NRC requirements. Related to this is the uncertainty as to degree or scope of these changes which may occur at the national level. It is within this frame work that we offer some general comments on NUREG-0553.

We believe that the estimated costs for preparing the plan, exercising the plan, training of personnel, and purchase of necessary equipment is essentially accurate. The salient point is that, while the cost of preparing the plan might be absorbed within the normal radiation control budget, the remainder of these costs very likely can not.

The institution of the 10- and 50-mile emergency planning zone concept will increase the costs of the plan and on-going preparedness. At this time, we are unable to state how much increase this concept may cause.

Communications, both for initial notification and for 2-way radio linkage of the personnel responding to an incident, are of considerable concern to us. For your information, our evaluation of our capabilities and resources indicate that this area is our weakest point, excluding the lack of a finished, concurred-in plan.

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Finally, we believe that your office and the Commission should give serious consideration to the methods of funding discussed in NUREG-0553. Equally important, we believe that the Commission should make every effort to reduce the uncertainty which currently exists with respect to new or time-compressed requirements in emergency response planning which will have an adverse impact on state radiation control programs.

We appreciate the opportunity to make comments on this document, and it is hoped that our comments will be useful.

Very truly yours,

Joan K. Leavitt, M.D.
Commissioner of Health