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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Major General James C. Clem
The Adjutant General
State of Ohio
2825 West Granville Road
Worthington, Ohio 43085

Dear General Clem:

Your letter of December 4, 1979, to Dr. Hendrie has been referred to me for response. You express your conviction that your method of alerting the general public, with a goal of 100% notification within two hours, is far better than other systems with a shorter actuation time. You also express your understanding that neither the State of Ohio nor the NRC Office of State Programs were consulted by the NRC Office of Nuclear Reactor Regulation (NRR) before the requirement for a prompt alerting time was promulgated.

The basis for the time factors associated with an alerting requirement before a radioactive release as the result of a reactor incident is to be found in a report (NUREG-0396) dated December 1978, prepared by a US NRC-US EPA Task Force on Emergency Planning, entitled "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants." The Task Force was formed in response to a resolution of the Conference of State Radiation Control Program Directors in 1976. One of the Co-chairmen of the Task Force was the Assistant Director for Emergency Preparedness, Office of State Programs, NRC. Comments on the Task Force Report were solicited by the Office of State Programs, NRC, from state and local governmental authorities as well as industry representatives, public interest groups and private citizens. Comments were requested from the Adjutant General of the State of Ohio and from 19 local emergency preparedness directors in Ohio. Eighteen state agencies and 16 county or township agencies in the United States offered comments. The State of Ohio did not respond. Three sets of comments on emergency planning issues were received from individuals within the State of Ohio. The Task Force Report was presented to the NRC Commissioners during a series of meetings in 1978 and 1979, and on October 5, 1979, the NRC Commissioners released a policy statement which concurred in and endorsed for use the guidance contained in the Task Force Report.

NUREG-0396 expresses the planning basis for the time dependence of a release as a range of time values in which to implement protective action. This range of values prior to the start of a major release is of the order of one-half hour to several hours. The time available for action is strongly related to the time consumed in notification that conditions exist that could cause a major release or that a major release is occurring.

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The NRC Commission position on the need for early alerting is also stated in a proposed rule, 10 CFR 50 Appendix E, published in the Federal Register on December 19, 1979. The rule requires a licensee's emergency plan to include a description of administrative and physical means, and the time required, for alerting and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone (EPZ) (10 miles). The rule states that it is the licensee's responsibility to ensure that such means exist, regardless of who implements this requirement. A footnote to the rule defines "prompt" by stating that it is expected that the capability will be provided to essentially complete alerting of the public within the plume exposure pathway EPZ within 15 minutes of the notification by the licensee of local and state officials.

The Emergency Planning Teams of NRR have been explaining these requirements for early warning in an active program that includes meetings with licensees, state and local officials, and the general public in the vicinity of operating nuclear power plants. The teams do not specify the exact method to be employed. Sirens may be the answer in locations where people are close together, e.g., towns, beaches, recreational facilities, but sirens must be protected against freezing weather. In rural areas, tone alert systems similar to those used by the National Weather Service or by the Emergency Broadcasting System may be a better choice.

I trust that this information may be useful to you. If you have further questions on emergency planning matters, please contact Mr. James R. Miller on (301) 492-7014.

Sincerely,

Harold R. Denton, Director
Office of Nuclear Reactor
Regulation