



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION IV
 611 RYAN PLAZA DRIVE, SUITE 1000
 ARLINGTON, TEXAS 76012

November 27, 1979

PROPOSED RULE PR - Misc. Nureg 0610 (48FR 55946) 16

MEMORANDUM FOR: Secretary of the Commission
 U. S. Nuclear Regulatory Commission
 Washington, D. C. 20555
 Attention: Docketing and Service Branch

FROM: W. E. Vetter, Assistant to the Director
 Office of Inspection & Enforcement, Region IV

SUBJECT: COMMENTS: DRAFT NUREG-0610
 DRAFT EMERGENCY ACTION LEVEL GUIDELINES FOR
 NUCLEAR POWER PLANTS



1. FREQUENCY OF EVENTS - NOTIFICATION OF UNUSUAL EVENT

We feel that the draft estimate is too low. Experience indicates that, using the draft examples of initiating conditions, the frequency would be six to ten times per year rather than once or twice.

2. The listing of initiating conditions needs clarification with respect to attendant circumstances. For example:

- a. Would initiation of the ECCS during surveillance be an event? During startup?
- b. Would failure of safety relief valve to close during testing be an event?
- c. Wouldn't the location of a fire be a determining factor? For example, fire in a cable spreading room would have greater significance than in a remote turbine building.
- d. What would constitute a security threat? Bomb letter? Telephone call? Two pickets at front gate? 200 pickets?

3. We assume that this guidance has not included NRC involvement intentionally ... that these guidelines are in addition to and separate from reporting requirements and thresholds already established by the NRC.

Acknowledged by card. dlh 11/30

8004020 128

Secretary of the Commission

2

November 27, 1979

Our experience in Region IV is that the proposed guidelines are appropriate and necessary. Furthermore, we have every reason to believe that our licensees share this view.



W. E. Vetter
Assistant to the Director

cc: Karl V. Seyfrit
G. L. Madsen
W. C. Seidle

Steven C. Sholly
304 South Market Street
Mechanicsburg, PA 17055
26 November 1979

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Docketing and Service Section

Dear Sir:

DOCKET NUMBER

PROPOSED RULE

17
PR - misc. NUREG
0610 (44 FR 5546)
NOV 30 1979



I am writing in response to the proposed amendments to Regulatory Guide 1.101, published as NUREG-0610, which recommend the replacement of the Emergency Action Level classes which are contained in Section 4 of Regulatory Guide 1.101. I find the proposed new classification scheme unacceptable.

As a resident of the area surrounding the Three Mile Island Nuclear Station and a party to the Unit No. 1 Restart Hearings now in progress, I am shocked by the impropriety of the proposed classifications. It is clear from reading the Technical Reports of the Staff of the President's Commission on the Accident at Three Mile Island as well as NRC documents (principally NUREG-0600 and NUREG-0396) that the proposed scheme will not satisfy the need for better emergency planning and timely notification of the public under emergency conditions.

For example, to permit the release of up to 1000 curies of I-131 and still not go to a General Emergency status is unthinkable. Further, the example initiating conditions given in the proposed classification scheme are littered with inappropriate examples. To cite "Imminent loss of physical control of the plant" as a condition for only a Site Emergency is absurd; similarly, to cite "Degraded core with possible loss of coolant geometry" as a condition for Site Emergency is not acceptable. Both of these conditions call for a General Emergency and a high level of emergency preparedness off-site for potential evacuation.

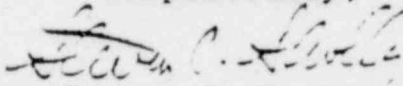
Some proposed initiating conditions at the level of Site Emergency appear to suggest that a Class 9 accident could occur and not result in the declaration of a General Emergency. For instance, a known loss of coolant accident greater than makeup pump capacity suggests that the design basis has been exceeded-- in fact, that a Class 9 accident has occurred. Imminent loss of physical control of the plant certainly suggests Class 9 accident conditions exist, yet the proposed amendments to Regulatory Guide 1.101 list this as requiring only a declaration of Site Emergency.

A prime criticism of the NRC in the President's Commission on the Accident at Three Mile Island was that of attitude. The proposed changes to Regulatory Guide 1.101 as embodied in NUREG-0610

strongly suggest that the "business as usual" attitude is alive and well at NRC.

I would gladly provide detailed responses to each section of the proposed changes, but my time is totally absorbed by the Unit 1 Restart Hearings. Suffice it to say that my recommendation regarding these changes is that they be rescinded and that the Staff be requested to do its homework prior to another proposal along these lines. I, for one, am not willing to put up with such "business as usual" attitudes any longer. If the residents of this area were aware of these proposed guidelines, which were issued over the signature of Mr. Denton, they would be enraged.

Respectfully,


Steven C. Sholly



November 26, 1979

DR DONALD F. KNUTH
President

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Chilk:

In response to Mr. Denton's September 19, 1979 letter requesting comments on NUREG-0610, "Draft Emergency Action Level Guidelines for Nuclear Power Plants," KMC, Inc., in conjunction with 21 utilities participating in our Coordinating Group on Emergency Preparedness Implementation, is pleased to offer the enclosed comments. A list of the participating utilities is also enclosed.

The comments we have developed are structured into 1) a critique of NUREG-0610, and 2) a revised draft of the Action Level Guidelines which we believe are suitable for incorporation into a utility's emergency plan or supporting procedures. Although minor changes to this revised draft could be made to conform to some recent suggestions by the NRC staff, we believe the enclosed version represents sufficiently reasoned consideration to be useful to the Commission in its deliberations on this subject.

There are considerations of the Action Level Guidelines that go beyond detailed comments of the individual elements of NUREG-0610. These considerations are reflected implicitly in the enclosed comments, but deserve special emphasis. Although NUREG-0610 is excellent initial guidance, it would not be appropriate to assume that it could or should be incorporated in any individual emergency plan en toto. The actual Action Level Criteria in a specific plan must be linked to the facility/site situation associated with it, and must be compatible with the State/local plans and acceptable to the State/local authorities. Although general structure should expect individual circumstances at issue.

DUPLICATE DOCUMENT

Entire document previously entered into system under:

ANO 7912210053

No. of pages: 15

ant
of
35 PP
PDR
210053

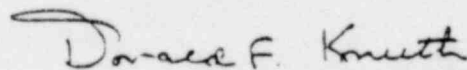
Mr. Samuel J. Chilk
November 26, 1979
Page 2

One of the most significant problems with the effectiveness of NUREG-0610 is that the programmed responses for the "Notification of Unusual Event" and "Alert" levels are too severe for the initiating conditions expected for those classes. Nothing useful is served in emergency response by overreacting to low level emergencies. We believe the enclosed comments describe a more practical and meaningful response for these two action levels.

The general question of immediate public notification is perhaps more appropriate for discussions on the staff's Acceptance Criteria for Emergency Planning. Our October 11, 1979 letter to Mr. Denton requested that the Acceptance Criteria be published for public comment, especially comment by affected State and local authorities. However, there is one aspect of this question that very directly relates to NUREG-0610. The Action Level Guidelines suggest that immediate public notification be activated for site emergencies. While this is appropriate for emergencies falling into the general emergency class, it is not at all appropriate for the lower level of significance of site emergency events. The events of this lower level class are not worthy of alarming all of the people within a 10 mile radius of the plant when, by definition, there are no specifically predicted exposures as a consequence of the site emergency. We request that the Commission give special attention to this proposed staff requirement as we believe it will undermine emergency planning effectiveness rather than to potentially improve it.

In closing, we appreciate the opportunity to comment on the guidelines of NUREG-0610, and hope to have the opportunity to participate in any future Commission activities designed to logically tie together all of the presently diverse activities underway relating to the matter of emergency preparedness.

Sincerely,



Donald F. Knuth

encl.

bcc: Brian Grimes
Jim Miller