

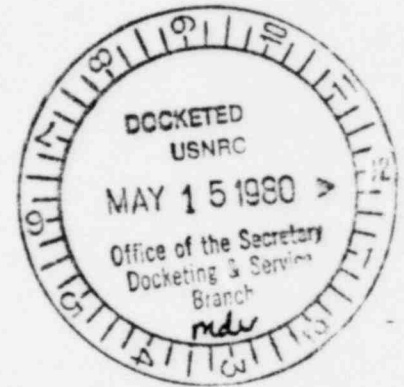


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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MAY 6 1980

JOURNAL NUMBER
PROPOSED RULE PR-Misc-NUREG-0654 (17)
(45 FR 9768)



Robert G. Ryan
Federal Emergency Management Agency
1725 I Street, N.W.
Washington, D.C. 20472

Dear Bob:

My comments on NUREG-0654 enclosed with my letter to you dated April 23, 1980, contained some errors in references to item numbers. Enclosed is another copy of the comments with the corrected item numbers annotated.

I apologize for any inconvenience these errors may have caused.

Sincerely yours,

Joe E. Logsdon

Joe E. Logsdon
Emergency Preparedness
and Response Branch
Office of Radiation Programs (ANR-461)

Enclosure

cc: Brian Grimes, NRC ✓
EPA Regions I-X

Acknowledged by card. 5/20/80. mdv...

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APR 23 1980

Robert G. Ryan
Federal Emergency Management Agency
1725 I Street, N.W.
Washington, D.C. 20472

Dear Mr. Ryan:

This is in response to your request for comments on NUREG-0654. Basically, this document is a significant improvement over the Guide and Checklist. Some general comments regarding needed improvements are:

1. The tone that is set by the words "must" and "shall" may be antagonistic to State and local planners who are not under the jurisdiction of Federal agencies. These should either be softened in the guidance or it should be explained in the introduction that those demanding terms apply only to the operator plans.
2. The document is written so as to imply that each agency will review the operator, State, and local plans for any criteria designated as a responsibility of that agency. It was my understanding that only NRC and FEMA would review the operator plans and that they would refer to other appropriate agencies for advice as needed. Furthermore, it should be recognized that EPA will, in some cases, only review against portions of a numbered criteria. This would be the case where part of the criteria does not apply to EPA responsibilities. For example, in criteria A.2.a, EPA would review only State and local plans and only with regard to accident assessment, protective response, and radiological exposure control.
3. Many of the items still do not include specific criteria by which a planning element can be judged adequate; however, I do not believe we can improve them significantly until we have some experience in their use. Along this line, I have invited our Regional Radiation Representatives to provide their comments separately based on their experience in using the criteria in plan reviews.

EPA:OPP:EAD:JELOGDON:ss:4/2/80:CN-2:Rm.1006:x-77390:ANR-461

Enclosed is a set of comments on particular criteria. Please do not hesitate to call if you have questions on these comments.

Sincerely yours,

Joe E. Logsdon
Protective Action Planning
and Investigation Branch
Office of Radiation Programs (ANR-461)

Enclosure

Environmental Protection Agency
Office of Radiation Programs
Comments on NUREG-0654
April 1980

Introduction - Page 2 states "final guidance may take the form of regulations". We see no need for regulations since they would not apply to State and local officials responsible for developing and maintaining the plans.

Page 15, Table 3 - This table is subject to misinterpretation for thyroid exposure because of the last two isotopes in the first column (Te-132 and Kr-88). Te-132, which decays to I-132, was included because it would represent significant exposure to the thyroid in the event of a particulate release which did not include radioiodine. For this situation, however, the thyroid would not be the critical organ. For instances of only noble gas release, Kr-88 would cause the highest dose to the thyroid from external sources because of its higher gamma energy. In this instance as well, the thyroid would not be the critical organ. Both these isotopes should be deleted from the first column. This table should also be corrected, or at least footnoted, for the next printing of NUREG-0396 from which it was extracted.

Page 24, last sentence - The role of IRAP has been omitted.

Page 25, second paragraph - Plans should also have an "Executive Summary" for quick reference. An example of such a summary was previously provided by Charles Amato in his comments dated October 2, 1979.

Page 34, item ^{C.1}~~B~~ - This section erroneously implies that the State's only contact with IRAP is DOE. This part should be broadened to indicate that States should identify the IRAP resources available to them, the persons authorized to request IRAP assistance, and the procedures for obtaining assistance.

Page 35, item C-4 - In addition to listing organizations that could provide assistance, they should list the assistance that they can be expected to provide and the procedures for obtaining that assistance.

Page 36, items D-1 and D-3 - Item D-1 requires the facility operator to establish an emergency action level scheme as set forth in NUREG-0610. Item D-3 requires the State and local organization to establish an emergency action level scheme consistent with that of the operator. NUREG-0610 establishes a scheme for protective actions based solely on conditions within the plant. This allows no judgment by State and local officials at the planning stage or at the time of response regarding appropriate protective actions. NUREG-0610 should be revised to indicate that the protective actions shown as a function of plant conditions are considered to be generally appropriate subject to the judgment of planning and response officials. We have previously provided comments on NUREG-0610.

Page 40, item F.1.d. - Provisions should be made for communication with all emergency workers.

Page 44, Item ~~F.2~~^{H.3} - This Item should be expanded to require the EOC to be equipped with detailed maps and overlays to cover the EPZs as well as large area maps. These overlays should clearly identify:

1. the nuclear facility;
2. field EOC locations;
3. staging and support areas;
4. portable water supplies and or water treatment plants;
5. dairy processing centers;
6. airports;
7. fuel supply;
8. supporting institutions;
9. population distributions;
10. institutions requiring special consideration;
11. reception center for evacuees;
12. evacuation routes.

Page 52, item J.9. - This item should be expanded to require the State to establish rapid authorization procedures operable 24 hrs/day for local officials to implement early protective actions based on plant conditions and associated recommendations of the facility operator. I question whether a Federal Agency can ignore FRC Reports 5 and 7 without an explanation.

Page 57, item K.5.a - It is appropriate to have action levels for decontamination onsite. Offsite surface contamination on property and equipment is primarily a long-term recovery problem, and it should not be necessary to include recovery procedures in emergency plans. Persons who become contaminated as a result of being in a plume would have much more severe exposure as a result of inhalation than from the corresponding skin contamination; however, guidance for skin contamination is appropriate. This item should be separated to show only onsite guidance for contaminated property and equipment whereas all parties should have guidance for skin contamination.

Page 57 - Item ~~K.5.b~~^{N.5.b} should apply only onsite. NUREG-0356 specifically advises against such planning by State and local officials.

Page 60, item 3 - This item appears unnecessary. Recovery operations do not require an emergency plan.

Page 61, Item 1.a. - We are asking the States to test their plans. However, there is no guidance explaining how to determine, on the basis of a test, whether a plan is acceptable. It is purely judgmental, and different observers would judge differently. Guidance for judging acceptability cannot be developed without a guide for testing. The Federal Government (primarily FEMA) should develop testing guidance and judging guidance for each plan element.

Page 63, Item ~~N.2.b.(1)~~^{N.2.2.(1)} - Health physics drills should also test the ability to estimate projected dose based on release rates and meteorology.