

0654 filed
SECY

State of Alabama
Department of Public Health
State Office Building
Montgomery, Alabama 36104

IRAL MYERS, M. D.
STATE HEALTH OFFICER

March 20, 1980

PROPOSED RULE PR-Misc.-NUREG-0654 (12)
(45 FR 9768)

Mr. Richard Payne
Environmental Radiation Section
U.S. Environmental Protection
Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30308



Dear Dick:

In Atlanta during the period in which you were leading the discussion, I raised the issue of the problems I had expressed in implementing Item C.1 of NUREG-0654. However, you had to leave meetings before I could discuss this with you.

This specific item says to "identify the available RAP/IRAP resources relied upon". How can the states rely upon a resource unless arrangements have been made for utilizing that specific resource and a commitment has been obtained that a certain resource will be delivered by RAP/IRAP?

The State Radiological Health Agency can best determine what radiological resources will be needed to augment the state's radiological resources in the event of a nuclear power plant incident. Thus, this Agency formulated a set of "Standing IRAP Requests" and forwarded them to DOE for review and approval. It appears that this method is not acceptable to DOE as illustrated by the copy of Mr. Stetson's letter which is enclosed along with a copy of the March 11, 1980, letter from Mr. Wayne Smalley to Mr. Godwin which states, "I don't believe it would be practical for the States to set up standing requests for specific items from specific Agencies..."

It appears that the only way that item C.1(c) of NUREG-0654 can be addressed is to have the plan say that no RAP/IRAP resources can be relied upon by the states, since I don't believe a state can rely upon, or plan for resources for which they don't have a knowledge and commitment that each specific resource will be delivered according to the plan.

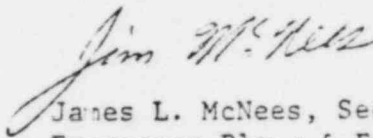
Acknowledged by card... 5/20/80...mdw

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Would such a statement to this affect be acceptable for RAC approval on this item?

Regards,



James L. McNees, Section Chief
Emergency Plans & Environmental
Monitoring
Division of Radiological Health

JLM:kg

Encl

cc w/o Encl: Sam B. Slone, III, Alabama Civil Defense
Harris M. Pope, RAC Chairman, FEMA Region IV, Atlanta
Jack Richardson, FEMA, Region IV, Thomasville
R. E. Trojanowski, NRC, Atlanta
J. C. Heard, FEMA, Region IV, Atlanta
Vernon Darley, DOT, Atlanta
J. A. Brennan, FDA, Atlanta
N. Stetson, DOE, Savannah River
Wayne Smalley, DOE, Oak Ridge

i cc - R. G. RYAN