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SECY

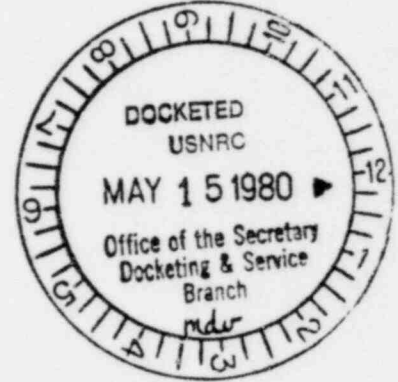
COMMONWEALTH OF VIRGINIA

State Office of Emergency Preparedness

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April 25, 1980

DOCKET NUMBER
PROPOSED RULE PR-Misc.-NUREG-0654 (15)
(45 FR 9768)



Mr. Robert G. Ryan, Director
Radiological Emergency Preparedness
Division
Federal Emergency Management Agency
1725 I Street, N.W.
Washington, D.C. 20472

Dear Mr. Ryan:

The following comments are provided on document NUREG-0654/
FEMA-REP-1 in response to Federal Register Notice Volume 45, No. 31,
dated February 13, 1980:

1. It is recommended that the piecemeal implementation of this
interim guidance be suspended and that a reasonable suspense date be
established after public comments have been considered before it is
adopted by Federal agencies as a guide for reviewing State and local
government and facility operator radiological emergency response plans.

Reason:

a. This document was published for interim use and comment by
Federal Register Notice, dated February 13, 1980, with a suspense date
of May 13, 1980. It is conceivable that comments of the states, the
local governments, and the licensees could result in significant re-
visions within the next few weeks. Major improvements in emergency
response under the new guidance will result from improved facilities
rather than plan format.

b. FEMA and the NRC have adopted this interim guidance as a
basis for plan review. We have been informed by VEPCO that they must
revise their North Anna Station Plan to meet the new criteria as a
condition for full power licensing of their North Anna Unit 2. In
order to meet their anticipated operational readiness date, their
revised North Anna Plan must be submitted to NRC for review in May
of this year. However, they do not have the same deadline for revising
their Surry Station Plan. In our view, it is essential that all on-
and off-site emergency response plans within a state be prepared under
the same criteria and become effective on the same date. This office
is currently working on a draft of State and local plans to meet the
revised criteria. However, we will be unable to complete this task
and obtain a FEMA-NRC review before late summer or early fall.

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Acknowledged by card 5/20/80 mdy

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2. Recommend the statement under paragraph G on page 21: "The Federal Emergency Management Agency expects to make a significant contribution to assist in the development of State and local plans." be clarified and expanded to include a commitment for follow-on Federal financial assistance for annual plan maintenance and training.

Reason:

The development of State and local government plans under the revised criteria requires a commitment of substantial manpower and funds on a continuing basis for annual plans maintenance, training, and exercises by the states and local governments. We believe the necessary financial resources should be identified before these commitments are included in State and local government plans.

3. Recommend the statement under paragraph J on page 25: "All plans should contain a table of contents and an index, ~~and the contents should be cross-referenced to the criteria contained in this document,~~" be modified as indicated.

Reason:

Such action would only add unnecessary bulk and would be of no value to the users of the plan. If such cross-referencing is required to assist the administrative review by the Federal agencies, it can best be provided as a separate document at the time the plan is submitted for review.

4. Recommend the requirement for the provision of communications between the local governments and Federal emergency response organizations established by paragraph F.1.c. on page 40 be deleted.

Reason:

Local governments will obtain Federal assistance through the State EOC. Separate direct communications are not required.

5. Recommend paragraph G.2. on page 42 be modified to eliminate the requirement for annual public information and education for the transient adult population within 10 miles of the site.

Reason:

The transient adult population includes thousands of one-time tourists. An annual program to educate this population would not be practical or effective.

6. Reference paragraph 10.h., page 54, recommend the requirement that "relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure

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emergency planning zone" be re-evaluated.

Reason: .

a. It is highly desirable that evacuees be relocated within the political jurisdiction of their residence, if possible. The additional 5 to 10 miles beyond the 10-mile ring for preplanned evacuation will require hosting a large number of these personnel in a neighboring political subdivision.

b. The statement at the top of page 10: "The NRC/EPA task force concluded that it would be unlikely that any protective actions for the plume exposure pathway would be required beyond the plume exposure EPZ" indicates that this requirement may be excessive.

7. Recommend the requirement set forth in paragraph 1.b., page 62, that "Each organization shall make provisions to start an exercise between 6:00 p.m. and midnight, and another between midnight and 6:00 a.m. once every six years" be eliminated.

Reason:

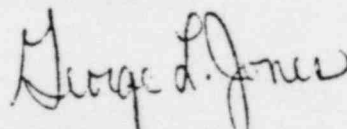
This involves unnecessary overtime and costs to local and State governments. The same purpose could be served by a communications check and alert of all emergency response personnel during these non-duty hours.

8. Recommend items P.6. and P.7. on pages 68 and 69 be deleted as a requirement for State and local government plans.

Reason:

Responsible agencies will be tasked to develop supporting plans and procedures. A detailed listing of these supporting plans and procedures would not be of value to other users of the Plan and the requirement would only add unnecessary bulk.

Sincerely,



George L. Jones

GLJ/ESK/jgl

cc: George M. Walters
Susan Aheron
Charles A. Christophersen
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