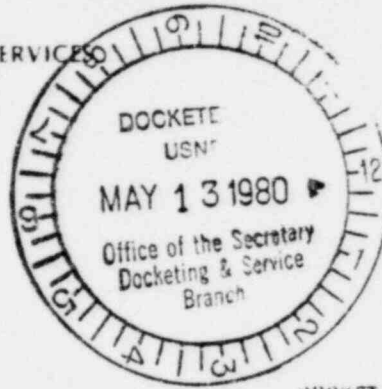


⑤ 8654 file and SECY

STATE OF COLORADO

Department of Military Affairs
DIVISION OF DISASTER EMERGENCY SERVICES

Camp George West
Golden, Colorado 80401
Phone (303) 279-2511



Richard D. Lamm
Governor

Brig. Gen. John L. Francis
The Adjutant General

John P. Byrne
Director

May 7, 1980

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

DOCKET NUMBER
PROPOSED RULE PR-NUREG-0654 ⑤
(45 FR 9768)

Attention: Docketing and Service Branch

Dear Mr. Ryan:

We have reviewed NUREG 0654/FEMA-REP-1, "Criteria For Preparation And Evaluation Of Radiological Emergency Plans And Preparedness In Support Of Nuclear Power Plants", January 1980, particularly as it concerns the interests of this organization. Our comments are forwarded herewith as provided for in the Federal Register, February 13, 1980, Notices.

Some of these comments are very candid about what we perceive as deficiencies but should not be taken as a condemnation of the NUREG 0654. It is recognized here that guidance in planning is necessary and the NUREG is a positive approach to the need. If the comments you receive are considered in a positive light, the resulting criteria can be a great and necessary step forward.

Sincerely,

John P. Byrne
John P. Byrne
Director

JPB:bh

Acknowledged by card. 5/19/80. mdv...

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State Of Colorado

Division Of Disaster Emergency Services
Comments Pertaining To NUREG 0654/FEMA-REP-1

I GENERAL COMMENTS

- A. Since NUREG 0654 addresses water reactor technology and does not make provisions for consideration of, or allowance for the significant aspects of HTGR technology as applied in Colorado's only nuclear power plant, Colorado's Radiological Emergency Response planning has been unnecessarily complicated in an effort to comply with the water reactor emergency planning criteria to assure NRC/FEMA concurrence.
- B. Further, since Colorado's nuclear power plant is of HTGR technology, modification of the NUREG 0654 has been sought with little or no success to date. Consequently, only tentative or limited interpretations of the criteria have been attempted.
- C. As a result, Colorado's nuclear power plant emergency plans provide for procedures and resources that few if any here believe could ever conceivably be required. This situation could mitigate against the smooth execution of an actual emergency response effort.
- D. The term "each organization" is used throughout the criteria without clearly indicating who these organizations are. Some inference may be gained from the "Applicability and Cross Reference to Plans" column, however, this often leads to confusion and/or duplication and unnecessarily complex and voluminous plans.
- E. Among the modifications to the criteria that are desired by State planning authorities are:
 - 1. The latitude to establish a forward or near site Emergency Operations Center based upon consideration of factors such as the facility type and site, geography of the area, transportation routes, prevailing meteorological conditions, demographics, etc, rather than upon a specific distance.
 - 2. The latitude to determine the need for and extent of an early warning alert system based upon type and generation of reactor.

3. The latitude to establish realistic radii for Emergency Planning Zones for plume and ingestion. For a HTGR these might be 4 or 5 miles and 15 or 20 miles or less rather than the 10 and 50 miles specified.
4. The latitude to tailor the radiological incident emergency action levels to existing, proven notification procedures where such will evoke the prompt desired response.

State Of Colorado

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II SPECIFIC COMMENTS ON CRITERIA (By page and element number)

- A. Page 27, 1c: Meaning is not clear. Does this mean the State plan vs each local plan? We interpret to mean a block diagram illustrating the organization for each plan at whatever level.
- B. Page 34, 1b and c: Existing information on RAP resources is not sufficient to make such arrangements. FEMA should clarify, inform, and provide guidance.
- C. Page 35, 3: Response time for radiological laboratories is not clear. Is this the time needed to activate the laboratories; the time required for delivery of items; the time required for an answer based upon an analysis, or all of the above?

Page 44, 2: The requirement to have the near site Emergency Operations Facility within 1 mile is too restrictive. The location should be outside the inhalation emergency planning zone. Another consideration would be a mobile operations van which could be located in the most advantageous position at a distance of 2-10 miles depending on circumstances.

- D. Page 44, 3: Meaning is not clear, especially as pertains to "Each Organization." Except for participation in a State, County or forward operations center, most organizations operate out of their headquarters or communications center.
- E. Page 45, 7: It is difficult to comply with this offsite meteorological provision when there is none that meets the criteria. Further, definition of the requirement and funding will take considerable time.
- F. Page 48, 7: The requirement to be able to measure 5 E-08 uCi/cc in the air in all kinds of weather is questioned at this time. There must be alternatives devised.
- G. Page 52, 10a and b: The State should be provided flexibility on the designation of sectors to be indicated on the map and not directed to use the format in Table J-1. The method we used is equal to the format in Table J-1. The Weld County Sheriff likes what we have and does not want us to change the format. An exercise has been completed and results of the training provided the Sheriff's department and other volunteer organizations indicate we should use our format.

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- H. Page 55, 11: Requires detailed maps indicating key land use in the emergency planning zones. This is an area of 7,854 square miles (at 50 miles radius) around the plant and would require an excessive quantity of maps be included in the plan. The maps for the plume exposure pathway should be included in the plan. Details for the area outside the plume exposure pathway extending through the ingestion exposure pathway are on file with the State Department of Agriculture. Latitude should be allowed in the plan for Agriculture to provide those details when required.
- I. Page 57, 3a,b: Again we have difficulty with the expression "Each Organization" relative to distribution of dosimeters and maintaining records. Only certain/specific organizations would distribute dosimeters, and only one organization will maintain exposure records although several organizations may originate such records. Requirements such as 3a and b must provide latitude to accommodate State ~~or~~ local agency structure.