

ARIZONA



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DOCKET NUMBER
PROPOSED RULE PR-NUREG-0654 (11)
(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:

We have reviewed FEMA-REP-1, NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, and wish to provide our comments and suggestions. We agree with the intent of FEMA-REP-1, NUREG-0654 to provide both improved guidance for emergency response planning and the basis for standardized emergency response planning to improve coordination between licensee and local and state governments, however, we feel several changes must be made before these criteria are acceptable.

Specific comments which we wish to provide include:

1. Section I.G.

FEMA and the NRC do not have jurisdiction to require licensees to provide funding and technical assistance to state and local governments. Funding is very site specific and depends on statutes and regulations governing state and local governments as well as the state utility regulating commissions. For this reason, we feel section I.G. should be deleted.

2. Section I.J.

FEMA and the NRC do not have the statutory authority to invoke restrictions on the licensee based upon results of drills performed by off site agencies. This point should be made clear in the discussion contained in the last paragraph of section I.J. or the last paragraph should be deleted.

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3. Section II.B.5

Requiring additional staff members to be available within 30 minutes of the declaration of an emergency is not warranted and poses undue burden on the operating staff. This is an unreasonable requirement for remote site locations where suitable housing may not be available within 30 minutes of the site. The time requirement for additional staff response should be re-examined to incorporate special provisions of remote site locations and multi-unit sites.

4. Section II.B.8 Table B-1

The minimum staffing requirements presented in this table should be clarified to distinguish between single unit and multi-unit stations. It is not reasonable that the same staffing requirements be imposed on each unit of a multi-unit station as are imposed on a single unit station.

5. Section II.C.2

Each principal organization is required to dispatch representatives to the operators near-site Emergency Operations Facility. Management of the response is then to be conducted from the EOF. Dispatching operator representatives to principal offsite governmental emergency operations centers, aside from being redundant and unnecessary, may well dilute or short circuit the effectiveness of EOF activities. This requirement should be deleted.

6. Section II.D.2

This section requires duplication of the example initiating conditions from NUREG-0610 to be incorporated in the licensee's emergency plan. Some flexibility must be allowed effective emergency response capability. The example initiating conditions from NUREG-0610 should be treated as what they are -- examples.

7. Section II.E.3

The initial emergency message should be kept clear and not include a pre-analysis of what might be taking place at the site. Initial contact may be with police authorities, etc., who could become confused with complicated messages.

8. Section II.E.4

Follow-up messages should not be pre-scripted since the appropriate

authority organizations will already have been activated and will be working with the specific information they need to make emergency response decisions.

9. Section II.E.4.i

Response actions should be based on dose rates, not on integrated dose. It may be impossible to estimate integrated dose or the duration of a release while the release is taking place.

10. Section II.E.6

No statutory authority exists which imposes on the licensee the responsibility to ensure that the means exist for prompt notification of the public. The statement "regardless of who implements this requirement" should be deleted as this has always been the responsibility of offsite agencies. We further contend that the issuance of licenses by the NRC should not be predicated on the actions of a third party which is beyond the control of the licensee.

11. Section II.H.5

This requirement should not be to identify and establish onsite monitoring systems that are to be used to initiate emergency measures but rather should be to require the operator to make provision to acquire data for initiating emergency response.

12. Section II.H.5.a

The requirement for monitoring offsite physical phenomena other than meteorology should be deleted. This information is not required in real time to plan emergency response.

13. Section II.H.7

These requirements are contained in section II.H.6. Therefore, section II.H.7 should be deleted.

14. Section II.I.5

We object to the requirement that meteorological information be transmitted to an offsite NRC center. We contend that it is a serious judgemental error to assume that crisis management should be performed by the NRC (or anyone else) except at the emergency operations facility. The expense involved in meeting this requirement is not justified if emergency response is to be coordinated from

the near site emergency operations facility. Analysis of the actions of the licensee can be performed after a crisis is past, but the fact remains that the immediate decisions are the licensees'; we contend these decisions can best be made without the prospects of this type of long distance advisement.

15. Section II.I.7

The NRC and FEMA should examine the radioiodine detection level of $5 \times 10^{-8} \mu\text{Ci/cc}$. This capability goes at least two orders of magnitude beyond useful emergency response measurements. Relating detection of radioiodine to Protective Action Guide levels should result in a more reasonable value of $10^{-6} \mu\text{Ci/cc}$.

16. Section II.J.3

This requirement should be modified to exclude construction workers located outside the 10CFR73.55 security area at multiple unit sites.

17. Section II.J.5

This requirement should be modified to consider the case of construction at multiple unit sites. Thirty minutes is insufficient time to ascertain the location of a large number of construction workers with the required degree of accuracy.

18. Section II.J.6

The radiation protection requirements of this section need to be made specific. They should be related only to those persons essential to plant operation or for the management of a Site or General Emergency.

19. Section II.J.8

The requirement for evacuation time estimates should be directed toward state and local authorities as it is correctly done in section II.J.10.1.

20. Section II.J.10.c

This requirement is the responsibility and within the authority of state and local officials. It should be deleted as a licensee requirement.

21. Section II.J.10.h

This section requires that relocation centers be located 15-20 miles from a site. There is not basis for this requirement. We feel that the relocation center requirement is site specific and should be handled on a case by case basis between FEMA and state and local officials.

22. Section II.N.1.a

These requirements for test exercises deviate substantially from the proposed 10CFR50, Appendix E rules (44 FR 75173). This apparent change from either alternate position of the proposed Appendix A should be deleted from this document and resubmitted as an additional proposed rule change to 10CFR50, Appendix E, with appropriate public comment directed on this matter in that context.

23. Section II.N.2.e.(2)

The use of spiked samples with actual elevated radiation levels is a potentially dangerous practice leading to unnecessary exposure of radiation protection personnel and is certainly not in accordance with the concept of ALARA.

24. Appendix 2 Sections 1.c.(4) and 2.c. (6)

The requirement for redundant power sources to redundant meteorological measurements systems is not technically justified by plant operating experience. In the event of a failure of the onsite meteorological system, sufficient historical data exists to reasonably predict the dispersion characteristics of a significant radiological release with the use of basic data from nearby National Weather Service stations.

We consider the probability of a failure of the onsite meteorological system concurrent with a significant release to be sufficiently small that redundant power supplies are unnecessary. Several other alternative courses of action are available and can be easily performed at our remote site. With less than 3000 people in our 10 mile EPZ, some site specific flexibility should be incorporated in these requirements.

25. Appendix 2, Section 3.C. (1)

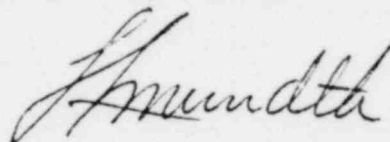
The requirement for a Class B Model should be clarified. Considering

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the extensive programs required by the NRC Branch Technical Position on Environmental Radiological Monitoring and the capabilities of the required Class A transport and diffusion estimates, the requirement for a Class B model is excessive, and provides no additional capabilities.

We trust that these comments will be helpful to you in preparing the final issue of FEMA-REP-1, NUREG-0654.

Very truly yours,



RWK/bjm

cc: Mr. Samuel J. Chilk ←
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