

## OFFICE OF EMERGENCY SERVICES

POST OFFICE BOX 9577  
SACRAMENTO, CALIFORNIA 95823  
(916) 421-4990



May 20, 1980

Brian K. Grimes, Program Director  
Emergency Preparedness Program Office  
Office of Nuclear Reactor Regulations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Brian:

With reference to your letter of May 9, 1980 regarding the requirements for the conduct of exercises to test the effectiveness of state and local emergency response plans, I have serious concern for the proposed revision to NUREG-0654. My concern stems from:

1. I don't think we need to conduct more than one test per year of the state plan; furthermore, most of us don't have the staff or resources to prepare and conduct 2 to 2½ tests per year.
2. Your wording implies the licensee assumes the lead role in these tests. Since the thrust of the test is directed to state and local preparedness, we should be the lead agency--not the licensee.
3. Although not covered in the proposed change, your cover letter indicates there will be full federal participation in an exercise at each site every five years. This means if we have five sites we will involve the federal agencies each year.

I appreciate and share the frustration you must have endured in coming up with the proposed wording; I have been playing with my proposal for the past few days. With reactors in contiguous states impacting on the state plan, as well as reactors within their own borders, it isn't easy to write the proper phrasing to cover all contingencies. Nevertheless, my suggested wording is attached and you will note I put the state in the lead role and attempt to limit participation to one test per year for the inhalation pathway, with the ingestion pathway tested every three years and federal participation every three years.

Since Jim Montgomery has resigned as Chairman of the IOAC, I am sending my comments direct to you with a copy to Frank Mancuso, Acting Chairman. I am assuming you will attend the meeting in Cedar Rapids, and we can discuss this subject as well as our concerns regarding other aspects of NUREG-0654.

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Brian K. Grimes  
May 20, 1980

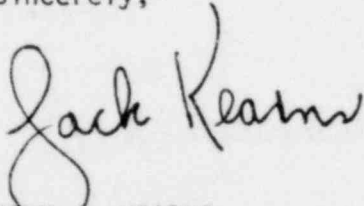
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Also, I applaud the NRC efforts regarding stockpiling potassium iodide for use during a reactor accident; however, again I have some concern.

1. The supplementary information indicates the possibility exists for plume exposure pathway PAG's to be exceeded at distances of 100 to 200 miles. This, coupled with the information in Table 1 on KI costs out to 150-200 miles, casts some doubt on the validity of the 10 and 50-mile emergency planning zones.
2. The use of the cost benefit ratio (dollars per thyroid nodule prevented) in Table 1 is highly questioned. This calculation is so fraught with uncertainty that it makes the whole table suspect.
3. The Statement of Policy whereby the NRC encourages storage of potassium iodide for nuclear power plant personnel, offsite emergency response personnel, and offsite institutions within 10 miles of reactors where immediate evacuation may not be feasible stops just short of covering all potentially affected groups. The NRC should add a fourth proviso whereby the federal government would store large quantities at a few strategic locations in the nation so it could be rapidly available for use by the general population following an accident. I don't want to be the one talking about cost per nodule if an accident does happen and KI is not available for women and children potentially exposed or perhaps already exposed. The effectiveness of KI even hours after the exposure makes it worthwhile to consider stockpiling for rapid distribution to the general population.

I trust my comments will be of some assistance, and I look forward to discussing these with you at the next IOAC meeting.

Sincerely,



JOHN J. KEARNS  
Assistant Director

Attachment

Proposed Statement Regarding Exercises  
to Test Nuclear Power Plant Emergency Plans

John J. Kearns

Exercises shall be conducted with the following regularity:

- (1) Each state shall conduct at least one test of its inhalation pathway emergency response plan every twelve months. This shall be a joint exercise with participation by the licensee and local governments within that plant's plume exposure emergency planning zone (EPZ). If the state is within the plume exposure EPZ of more than one reactor site, these plants not involved in the full-scale exercise shall be required to conduct a limited drill testing a part or parts of their response plan. Each year a different plant would be involved in the full-scale exercise.
- (2) Each state shall conduct a test of the ingestion pathway EPZ plan at least once every three years. This will be a joint exercise involving participation by the licensee and all local governments within that plant's ingestion EPZ.
- (3) In addition, at least once every three years there will be federal participation in the full-scale test of the state and local inhalation pathway emergency response plan.