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PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY  
P.O. BOX 3321  
HARRISBURG, PENNSYLVANIA 17105



April 28, 1980

PROJECT NUMBER  
PROPOSED RULE PR-Misc-NUREG-0654 (16)  
(45 FR 9768)

Mr. Robert G. Ryan  
Director  
Radiological Emergency Preparedness  
Division  
Federal Emergency Management Agency  
1723 I Street NW  
Washington, D.C. 20472



Dear Mr. Ryan:

The Federal Register, Volume 45, No. 31, Page 9768, solicited comments on FEMA-REP-1, NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants".

Comments by the Bureau of Radiological Protection, Department of Environmental Resources will be provided separately.

Comments from this agency are attached.

Sincerely,

Oran K. Henderson  
Director

OKH:sam (TEL: 717-783-8150)

cc: Secretary of the Commission  
Charles A. Crowe

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

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COMMENTS ON FEMA-REP-1, NUREG-0654

Forms and Content of Plans, Paragraph I.J., page 25.

This criterion calls for the plan to contain an index cross referenced to FEMA-REP-1. Cross referencing to a Federal document as a formal part of a State plan serves only as an assist in the Federal evaluation of the plan. It contributes nothing to the real value and use as a planning document. Suggest the index be prepared as a separate list attached to the letter of transmittal.

Notification Methods, Paragraph II.E.6., page 39.

Time Factors Associated with Releases: The time factors identified are from one half hour to several hours which times are defined without any statements of feasibility. It is impractical to impose a requirements such as this without some understanding of feasibility. Therefore, it is recommended that a feasibility study be initiated to analyze the elements involved in meeting the requirement and how best it can be done.

Protective Response, Population Distribution, Paragraph II.J.10, page 52.

The need for population densities by 5 mile increments beyond 20 miles is questioned. Suggest that 10 mile increments be used between 20 and 50 miles.

Radiological Exposure Control, Paragraph II,K.3.b., page 57.  
Suggest the sentence read, "Each organization shall provide for maintaining dose records for emergency workers involved in any nuclear accident."

Responsibility for the Planning Effort, Paragraph II,P., page 7.

A list of all of the Standard Operating Procedures involved in supporting the plan is of questionable value.

General Comment: The inference throughout FEMA-REP-1 is that the RAC assessment is to include a detailed review of written procedures of State working elements. This seems unrealistic, unnecessarily detailed and not appropriate for the Federal evaluation of the plan. If the intent of this approach is to assist in determining the workability of the plan, its value is questionable. The workability of the plan should be demonstrated by exercises and drills not determined by delving into whether the written word of State working elements expresses acceptable detailed procedures to the satisfaction of Federal agencies.