



DOCKET NUMBER PR-Misc.-NUREG-0654 (22)  
PROPOSED RULE

(45 FR 9768)

# State of South Carolina

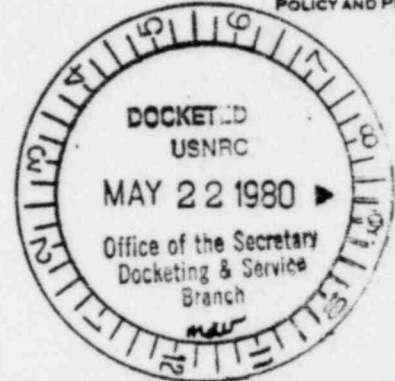
## Office of the Governor

RICHARD W. RILEY  
GOVERNOR

May 16, 1980

OFFICE OF EXECUTIVE  
POLICY AND PROGRAMS

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



Dear Mr. Ryan:

In response to the FEMA/NRC request (Federal Register/Vol. 45, No. 31/Wednesday, February 13, 1980/Notices), I am forwarding the State of South Carolina's formal comments on NUREG-0654 FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (For Interim Use and Comment).

While South Carolina has formally expressed its concerns regarding NRC's proposed changes to emergency planning regulations for nuclear facilities (10 CFR, Part 50) which NUREG-0654 is intended to support, it does welcome federal guidance to assist in the development of essential response plans regardless of the outcome of NRC's proposed rule-making. The state supports, in principle, the standards outlined in NUREG-0654; however, it expresses reservations regarding specific criteria and the identification of levels of responsibility addressed in a number of elements of the document.

The State of South Carolina is committed to the development of effective response capabilities for the protection of life and property should a nuclear incident occur. These comments are submitted for the Steering Committee's review and consideration in the finalization of NUREG-0654.

Sincerely,

Lee M. Thomas  
Director

LMT/JLM/cs

Enclosure .

Acknowledged by card. 5/22/80

cc: (w/enclosure)

STATE OF SOUTH CAROLINA  
COMMENTS ON  
(NUREG-0654 FEMA-REP-1)  
CRITERIA FOR PREPARATION AND EVALUATION OF  
RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS  
IN SUPPORT OF  
NUCLEAR POWER PLANTS  
(FOR INTERIM USE AND COMMENT)

May 13, 1980

I. General

- A. NUREG-0654 FEMA-REP-1 outlines what can be generally accepted as essential elements for the development of effective radiological emergency response plans. The inclusion of state, local, and operator planning elements in this document provides a basis from which these organizations can identify necessary points of facility government interface and develop appropriate provisions for communications and coordination should a nuclear incident occur. As an effective emergency response will also require close coordination with federal response agencies, consideration should be given to including federal planning elements in NUREG-0654.
- B. The State of South Carolina welcomes federal guidance to support the development of "off-site" response plans; however, it appears that NRC and FEMA have failed to clearly recognize the diversity in state and local (government) organizations, resources, and practices in the identification of planning elements with a particular level of government and outlining specific methods in the development of capabilities. While NUREG-0654 provides a sound basis for the identification of essential planning elements to support the development of effective response capabilities, state and local government must maintain adequate flexibility to assign responsibilities and determine appropriate methods for the development of capabilities within existing operational environments. To the extent possible, provisions for assignments of responsibilities and methodology should be identified as guidance and not considered as a determinant in evaluating plans for "concurrence". (Note: Specific examples will be addressed below.)
- C. As NUREG-0654 must be applied nationwide, there is a potential that assignments of (off-site) responsibilities, as currently outlined in the document, may conflict with legislative requirements within a particular state. In this light, criteria for the assignment of off-site responsibilities should be established on an "and/or" basis.

- D. An "Emergency Plan" should be a working document to provide guidance for those key personnel responsible for its implementation. As an "Off-site Emergency Response Plan" will incorporate a number of state and local plans and other supporting documents, criteria that require repetition, an extensive summary of provisions of one plan in another plan, and/or specific details in addressing planning elements will tend to decrease the effectiveness of a "Emergency Plan" as a guidance tool. "Emergency Plans" should contain only essential information to guide the conduct of response operations; necessary supporting documentation should be addressed by reference.

## II. Specific

### A. Section A (Pages 27 and 28)

#### 1. Para. 2b (Page 28)

Legal authority should be referenced rather than described. (See also ID above)

#### 2. Para. 3 (Page 28)

Letters of Agreement are designed to provide and formalize a general understanding between parties regarding available assistance and/or mutual aid during an emergency. Identification of specific resources to be provided, criteria for implementation, and provisions for the exchange of information are more appropriately addressed in the respective plans and procedures of signing parties.

### B. Section C (Pages 34 and 35)

#### 1. Para. 1c (Page 34)

While designated personnel should be familiar with available RAP/IRAP support and plans should provide for immediate access to an inventory of available resources (i.e., maintain a current copy of RAP/IRAP Plans and/or supporting documents), identification of specific resources (beyond the designated DOE Regional Office) within an organization's response plan does not appear appropriate.

#### 2. Para. 2 (Page 34)

While there may be a requirement for communications and/or the exchange of liaison personnel between facility and local organizations during the initial period (i.e., prior to the arrival of appropriate state forces) of a major incident, the legal responsibility of off-site hazard assessment and interpreting technical information for local decision-making is that of state government. The criteria should clearly identify this assignment of responsibility and require the facility to establish procedures for communicating its recommendations for off-site protective actions to a designated agency of state government upon the arrival of appropriate (state) forces.

C. Section E (Pages 37 and 39)

1. Para. 1 (Page 37)

While many local governments may not possess the technical capability to accurately interpret the nature of an incident and given that this capability normally exists only at the state level, criteria should indicate that notification of local government through a designated state agency is permitted when immediate off-site protective response is not required. (See also II B2 above.)

2. Para. 3 and 4 (Pages 38 and 39)

Criteria should indicate a caution that local organizations should not be placed in a position where they must interpret technical information; such a situation could create a potential for over/under reaction at the local level. This caution would and should not preclude direct facility recommendations to local government when immediate off-site protective action is required. (See also II B2 and C1 above.)

3. Para. 6 (Page 39) and Appendix 3 (Pages 3 and 1 - 3 and 5)

While there is a definite need to upgrade "Warning Systems" for all emergencies, proposed criteria for the establishment of such systems around nuclear facilities appear to be excessive. The establishment of a warning system with 100%/90% effectiveness, as outlined, may be desirable as a ultimate goal; however, in light of the small probability of such a "worst case" incident occurring, substantive arguments indicating that a 15 minute time-frame may not be necessary, and the high cost for implementing such a system, it may not be practical. FEMA/NRC should re-evaluate proposed warning standards and examine alternate systems (i.e., more time consuming) to insure there is a realistic balance between "necessary" warning requirements and expenditures of limited funding resources.

Consideration should also be given to the accuracy of information available to the public after a 15 minute evaluation of a major incident. Utility recommendations for off-site protective actions would, by necessity, have to be based on assumptions rather than factual data. Concern is expressed that with such a severe time limitation, recommendations (i.e., evacuation) will be made without sufficient technical support. This could create a situation where implementation of protective actions may pose a greater hazard than the incident itself.



D. Section F. Para. 1c (Page 49)

The federal emergency response organization should be identified and responsibilities outlined (in NUREG-0654) in order that appropriate provisions for communications with the federal government can be developed. (See also 1A above.)

E. Section H (Pages 44 and 46) and Section I (Pages 47 and 49)  
Para. 7 (Page 45); 10 and 11 (Page 46) - Para. 8 (Page 49)

It can be anticipated, that in most cases, local organizations will not have the technical or equipment capability to conduct effective off-site monitoring operations. Identification of such a responsibility as an essential element of a local response plan is inappropriate. (Note: Civil Defense instruments should not be considered as providing a basis for the development of a local monitoring capability.)

F. Section J (Pages 50-55) & Section K (Pages 56-58)  
Para. 10 e-f (Pages 52-54) & Para. 3a, 4, & 5b (Page 57)

Decision-making for identifying appropriate off-site "protective response" and "radiological exposure control" measures is the responsibility of state government; criteria should indicate that local planning efforts be directed toward developing procedures to implement such measures. (See also II C1&2 & E above.)

G. Section N (Pages 61-65) & Section O (Pages 66-69)

South Carolina strongly supports the exercise and training programs to support the further development of effective off-site response capabilities; however, the inclusion of a detailed description of such programs within a "working Emergency Plan is not appropriate. State and local organizations should utilize the general principles outlined in Sections N & O to develop their respective exercise and training programs; documentation, if required, could be accomplished through a periodic FEMA/NRC review of records (i.e., scenarios, critiques, course outlines, etc.) for major program elements. This approach would provide a more accurate evaluation of the effectiveness of such activities.