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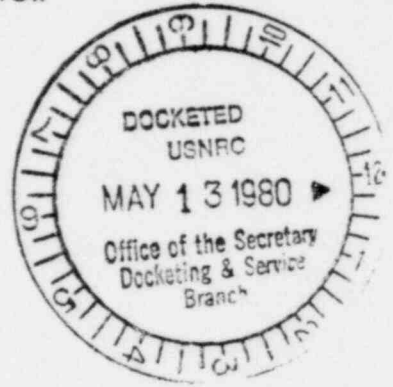


DEPARTMENT OF TRANSPORTATION
REGIONAL EMERGENCY TRANSPORTATION COORDINATOR

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REGION IV

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May 9, 1980

SUBJECT: FEMA REP-1, NUREG-0654

FROM: Regional Emergency Transportation Representative

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

Pursuant to Federal Register Notice, Volume 45, No. 31, Wednesday, February 13, 1980, the following comments on subject document are submitted for your consideration.

Part (or Section) II, Planning Objectives and Evaluation Criteria, beginning page 27.

C. Emergency Response Support and Resources.

1.a. - Suggest you insert "(by position)" between "persons" and "authorized."

1.b. - The term "arrangements" is vague as used. Suggest inserting "accommodating and" between words "for" and "using."

2. - The two sentences in this item should be broken out into two separate items.

3. - Recommend it be deleted and the following substituted. "Each organization shall identify radiological laboratories, which can be relied upon in an emergency, and define their capabilities and expected response times."

4. - Recommend it be deleted and the following substituted. "Each organization shall identify other type facilities, organizations or individuals which can be relied upon to provide assistance during a radiological emergency. Letters of agreement (where appropriate) or other forms of concurrence should be obtained and referenced in the plans."

Acknowledged by card. 5/9/80..mdv...

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E. Notification Methods and Procedures.

1. - There needs to be instituted within the REP Program (and specified as an element within this NUREG-0654 Part II Criteria) some specific requirement for protecting transient population who may be moving within public and private conveyances at the time of an accident. In actual practice local law enforcement authorities (among the first to be notified of an accident) would, as a first order of priority, block or restrict ground vehicular traffic from the most hazardous areas. Protection of persons in ground vehicles is almost automatic because the locals are the "controllers" of vehicle traffic. But that is not so with airborne, waterway and rail traffic. Federal or operating commercial authorities are either directly or indirectly involved with these, especially with air traffic where the FAA directly controls the patterns of flow of aircraft through airspace above both the plume and ingestion EPZs. In one known terminal area in this region (4) the approach pattern to the most active runway at a major air carrier airport calls for arriving aircraft to descend through the plume EPZ of a FNF. In another location, the centerline of a major north-south airway is approximately $3\frac{1}{2}$ miles from a FNF.

This writer (a RAC Member) is not qualified to determine the extent of the hazard from an airborne plume, especially as to what height the hazard extends. Discussions with other RAC members produced little satisfaction in that none are willing to define the extent of the hazard because of potential wide range variables in meteorological conditions at the time of an accident. I am willing to speculate, however, that if the plume is likely to rise to the height of the flight path we ought to insure that air traffic control authorities are notified immediately because of the great potential for rapid spreading of the contamination. The air intake/ventilation/pressurization systems aboard the modern day jet airplane are such that any radioactive substances picked up would be circulated throughout the aircraft, including baggage, freight and passengers compartments. Since the aircraft are employed in quick turnaround service, contamination could conceivably be spread to a dozen or more terminal facilities in very short order.

In view of the many unanswered questions at the regional level as to the extent and exact nature of plume EPZ hazards to transients in water borne, rail and airborne vehicles, where the flow is controlled by other than local authorities, the entire question as to what procedures for notification of control authorities should be insisted upon by the RAC is referred to FEMA/NRC headquarters for resolution. FURTHER GUIDANCE IS NEEDED.

2. - "Notifying, alerting and mobilizing" makes for redundancy. Why not simply "alerting and mobilizing?"

6. - E.1 comment, above, applies. Also, the 15 minute warning criteria, as a blanket requirement, is simply unrealistic. It may be acceptable as a requirement for "sounding" a general alarm which could conceivably alert 70-80 percent of the population residing in clusters, communities or villages but certainly not 90-100 percent in this category within five miles. One reason is that so many persons could be expected to be engaged in loud noise associated activities such as shop work, machinery operations, tractor and mower operations, loud playing radio and TV, or even sleeping in noise protected rooms, while some will not hear because of deafness or hearing deficiencies. Also, use of sirens to alert all persons in rural or sparsely populated areas will be cost prohibitive. Such persons will have to be alerted by either common land line system, special/dedicated alarm system or in person by messengers/couriers. In all probability, 40-60 minutes is about the least amount of time we can ever expect to achieve near 100 percent notification of all persons within the 10 mile EPZ.

F. Notification Methods and Procedures.

1.c. - Same comment used in E.1, above, applies.

1.d. and e. - "Field assessment teams" and "radiological monitoring teams"--are these terms synonymous? If that is the intent, recommend that one or the other be used, but not both.

G. Public Information. This term is perceived by the public to mean "news" or "press" when connected with something highly technical or potentially dangerous. A better term (and planning approach) would be to use the heading "Public Education, and Information," especially in light of the need for advance, or preaccident, emphasis on educating the population within the vicinity of the FNF.

2. - "Transient adult population." This term is generally construed to mean, for the most part, persons temporarily lodged in nearby hotels and motels. However, I submit that planning to meet this element should also include the means for alerting control authorities such as FAA Air Traffic Control, USCG, railroad operators, excursion boat operators, highway patrol, etc., so that passenger carrying vehicles of all types can be diverted out of or kept away from the plume exposure pathway EPZ. See special comment under E.1, above, pertaining to this subject.

H. Emergency Facilities and Equipment.

3. - "To carry out response functions" is inappropriate for an EOC. How about "Each organization shall establish an emergency operations center for use in directing, executing and/or controlling response functions?"

J. Protective Response.

1.c. - No column checked. Recommend this sub item be checked so as to be consistent with a, b, and d; or that only the 1 be checked and none of the sub items.

10.c. - Means for notifying all segments of the transient and resident population. Again, as covered under E.1, above, how about captive transient population, i.e., airborne, waterborne and rail, whose safety may depend upon the prompt actions or directions of control authorities? Shouldn't provisions be made to assure that such control authorities are immediately advised?

I appreciate the opportunity to comment on this interim criteria document.



VERNON O. DARLEY

Regional Emergency Transportation Representative
RAC Member for DOT Region IV