

DMB

November 5, 1982

Docket No. 50-255

Consumers Power Company
ATTN: Mr. R. B. DeWitt
Vice President
Nuclear Operations
212 West Michigan Avenue
Jackson, MI 49201

Gentlemen:

This refers to the telephone conversation of October 26, 1982, between Mr. Loomis of your staff and Mr. W. Axelson of my staff regarding the emergency preparedness informational booklet for the Palisades Nuclear Power Plant.

As discussed with your staff, the NRC has found a technical error in the Palisades booklet which could be misleading to the public and contradicts NRC policy regarding recommended protective measures. That error appears on page 8 of booklet entitled "What If I am Instructed To Evacuate." Paragraph three of that section states:

"Follow public notification information on radio, TV or via the public address system. Put on a dust mask or breathe through a damp handkerchief to filter out any dust in the air. Gather up a change of clothing, personal toilet articles, blankets or sleeping bags for each member of your family, special baby formulas and any special medications you or your family may need, as you would in preparation for a short trip, unless otherwise advised by local government."

The second sentence of the above stated revision is technically in error and could be misleading to the public. The NRC staff does not recommend respiratory protection and public evacuation, together as an automatic protective measure. (See NUREG-0654, Appendix 1, pages 1-16 thru 1-19.) In fact, if "ad hoc" respiratory protection is warranted, in place sheltering may be more appropriate than evacuation of the public. Also, other means of respiratory protection should include: closing windows and doors and turning off outside air conditioners. Most examples of General Emergencies listed in NUREG-0654 do not initially involve large scale releases of radioiodine or particulates directly to the environment which would require respiratory protection for the public. In fact, we expect the licensee to recommend evacuation of the public well before releases of large amounts of radioactivity to the environment.

One of the major goals of the new emergency preparedness regulations is dose savings to the public. Accordingly, predetermined actions are to be automatically initiated for a General Emergency, i.e., promptly notify the public and recommend sheltering for a 2 mile radius and 5 mile downwind. If evacuation is then recommended based on the potential for a large release of radioactivity or releases are projected to

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exceed the EPA standards, then the public should be promptly evacuated. Respiratory protection would not be needed and could hinder their movement. Requesting the public to acquire a dust mask or damp handkerchief could slow down their evacuation response time. Further, wearing a "mask" while driving a vehicle when it is not necessary could create a transportation safety hazard.

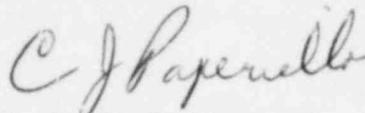
The NRC staff recommends the second sentence of the previously discussed paragraph from the Palisades booklet be deleted from the next annual revision and a new section added regarding in-place sheltering combined with respiratory protection. The revision should indicate what the public should do if asked to shelter, such as:

- a. Go indoors. Close all outside doors and windows. Turn off all air conditioners and ventilating devices that might draw in outside air.
- b. Listen to your radio for further instructions. Do not leave your shelter or evacuate unless told to do so.
- c. If you must go outside to warn a friend or family member, limit your exposure. You might be advised to cover your mouth with a cloth.

Accordingly, please submit a written statement within 25 days of the date of this letter describing your planned actions for correcting the error in Palisades booklet. Your response should include: (1) steps which will be taken; and (2) a schedule for completion of this action.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

for 
 J. A. Hind, Director
 Division of Emergency Preparedness
 and Operational Support

cc: D. J. Vandewalle, Nuclear
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