

May 9, 1975

Mr. Sherwood Davies, Director
Bureau of Radiological Health
State of New York
845 Central Avenue
Albany, New York 12206

Dear Mr. Davies:

In reply to your letter of April 22nd concerning New York State's Emergency Preparedness activities as they related to fixed nuclear facilities, I quite agree with you that our basic differences of opinion in emergency plan development do stem from the question of "what details must be incorporated in writing, in an emergency plan, as opposed to amply considering them in the preparation and formulation of the plan?"

I discussed the answer to this question both in the Emergency Preparedness Workshop and following my formal presentation at the recent Hyannis meeting of the National Conference of Radiation Control Program Directors. We consider that a comprehensive State Radiological Emergency Response Plan should contain all of the essential elements outlined in our "Guide and Checklist for Development and Evaluation of State and Local Government Radiological Emergency Response Plans in Support of Fixed Nuclear Facilities (WASH-1293)."

Under our interagency arrangement among Federal agencies, the NRC is responsible for "reviewing and concurring" in Radiological Emergency Response Plans in Support of Fixed Nuclear Facilities. We would, of course, find it difficult, if not impossible, to ascertain whether or not an essential element of the planning has been "amply considered in the preparation and formulation of the plan" unless it is documented in the plan.

Since it is our position that all of the WASH-1293 elements are "essential elements," it is also our position that each element should be addressed, in writing, in the appropriate emergency plans or other appropriate related documents developed by the State and its local governments. Unless this is done, there is no effective way (short of passing judgment on oral or written rhetoric) for the NRC, or the other involved Federal agencies to render an objective evaluation of what, for the most part, are the operational and technical elements of an effective plan.

May 9, 1975

We are pleased that your State is developing additional aspects of the State Radiological Emergency Response Plan. As I mentioned to you in my last letter, we continue to offer our help and assistance in the planning effort should you desire it.

Sincerely,

original signed by
Harold E. Collins

Harold E. Collins
Emergency Preparedness
Office of International
and State Programs

bcc w/incoming: HNBrown,DR:ISP
WHouston,IS&EP/RL
RVoegeli,OELD
CSiebentritt,DCPA
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cc NY state CD Director - May 1975 John C. Baker

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