



BENTON COUNTY

**EMERGENCY MANAGEMENT**

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August 3, 1993

Secretary  
US Nuclear Regulatory Commission  
Washington DC 20555

Attn: Docketing and Service Branch

Dear Secretary Chilk,

This letter is being submitted in response to the request for comments published in the Federal Register Vol 58, No. 98 page 29795, concerning proposed rules to become 10 CFR Part 72.

In general, Emergency Planning should be required prior to the initiation of operations for any facility that presents a risk to members of the public off-site. It is not enough that the plan should be submitted to local government for comment prior to submittal for approval as proposed in 72.32(b)(14). The planning should not proceed without the involvement of the emergency management agencies and off-site response organizations of the local governments that will be at risk in the event of an emergency at the facility.

Businesses that profit from activities that place communities at risk of injury or loss of life or destruction or contamination of property should also be required to provide monetary support to the affected jurisdictions. All businesses and individuals within the taxing authority of local governments support levels of response required for normal day-to-day events. Those businesses and individuals that place members of the community at risk beyond the ordinary should have to supply additional funding to the community in recognition of that additional risk. These funds should be dedicated funds for emergency response planning activities and the purchase of any specialized response equipment and training required by the types of risks presented by the facility. In this context, the funding should be subject to review by the Nuclear Regulatory Commission to assure that there is more than a token funding of local emergency planning and preparedness efforts.

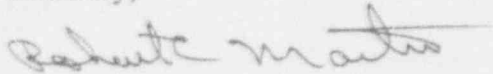
Changing the proposed part 72 to require local involvement in the creation of the emergency

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response plan and require funding of local emergency planning and preparedness activities directly attributable to the additional and above ordinary risk of Spent Fuel Storage Facilities and Monitored Retrievable Storage Facilities is appropriate given the above ordinary risk such facilities present to the local government units in their vicinity.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert C. Martin", with a horizontal line extending from the end of the signature.

Robert C. Martin, Director  
Benton County Emergency Management

c Diane Offord  
Washington State Emergency Management Division