

# EMERGENCY SERVICES and DISASTER AGENCY

GRUNDY COUNTY - CITY OF MORRIS

GRUNDY COUNTY COURTHOUSE

111 E. WASHINGTON ST.

MORRIS, ILLINOIS 60450

DOCKETED  
USNRC

Phones:

815-942-2672

942-2893

(R) 942-5807

JOE TEMPLE, Coordinator

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August 11, 1982

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Chief  
Docketing and Service Branch

PRM-50-33  
(47 FR 29252)

Dear Sir:

Reference: Docket No. PRM-50-33

This letter is in regard to a petition filed by the National Emergency Management Association concerning a recommended rule change in 10 CFR Part 50, Appendix E, Section IV.F.1.

The present requirement for an annual full scale exercise for each nuclear power plant places an excessive burden on local governments and their citizens. It is especially burdensome because Grundy County, Illinois is one of the few counties in the nation located within the EPZ of two or more generating stations (Dresden, LaSalle, and Braidwood).

The burden is twofold. First, the dollar cost for time spent preparing for and participating in annual exercises is excessive. In the case of Grundy County the exercises are redundant and therefore require unnecessary expenditures of local funds. Such practices are commonly referred to as "wasting taxpayers money." Secondly, these annual exercises require the unpaid volunteer sector of our emergency response teams to take time off from their regular employment in order to participate. In Grundy County we have 8 volunteer fire departments, 5 volunteer emergency squad/ambulance companies, 75 Emergency Service & Disaster Agency volunteers, plus numerous Red Cross volunteers. The typical volunteer loses \$90 to \$150 per day in pay when they are absent from work to participate in these required annual exercises. This is ridiculous!

With regard to the petition filed by the National Emergency Management Association concerning frequency of exercises, we recommend that offsite local agencies be required to participate as follows:

- a. Only once every 3 years with PARTIAL participation, regardless of the number of EPZ's impacting the area.
- b. Only once every 7 years with FULL participation, regardless of the number of EPZ's impacting the area.

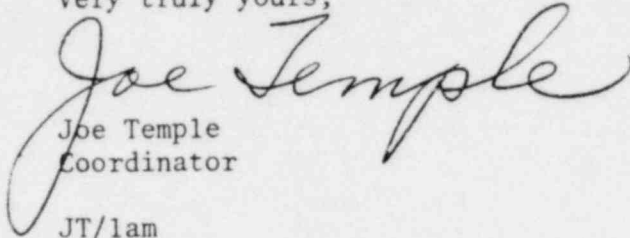
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DS II  
add: John Phillips 4000 MNBB  
Michael Jamgochian 1130 SS

8/17/82 emp

In conclusion.....Rules need changing to keep them relevant for tomorrow's needs, rather than for yesterdays' past. If the burden on local government and the volunteer sector becomes excessive, they may simply refuse to participate.

Very truly yours,

  
Joe Temple  
Coordinator

JT/lam

cc: Senator Charles Percy  
Senator Alan J. Dixon  
Rep. Tom Corcoran  
Nunzio Palladino, NRC  
E. Erie Jones, Ill. ESDA  
Wm. Waters, Chrnm Co. Bd.  
James R. Washburn, Mayor Morris