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September 30, 1982

DOCKET NUMBER  
PETITION RULE PRM - 50-33  
(47 FR 29252)

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

Ref: Docket Number  
Petition Rule: PRM-50-33

Dear Sir:

The County of Orange wishes to extend its support to the National Emergency Management Association's petition.

The petition addresses the requirement for state and local governments within the plume exposure pathway of any nuclear reactor to participate in at least one full-scale exercise per year and outlines a proposed change to this requirement. The proposed change recommends serious consideration be given to a biennial exercise schedule. The County of Orange fully supports the concept of the biennial exercise.

Our organization has participated with other offsite agencies and the utility in annual exercises for the past two consecutive years. This annual requirement has caused a burden in terms of time and money, particularly since Orange County is also required to conduct full-scale exercises simulating other emergency conditions (seismic, fire, flood, etc.). While our organization is supportive of plans, training, drills, and exercises, it is our opinion that emergency preparedness in nuclear matters can best be served by a biennial approach.

Thank you for your positive consideration of this matter.

Sincerely yours,

*Carole A. Hopwood*

Carole A. Hopwood  
Manager

CAH:ld

- cc: Nunzio Palladino, Chairman  
U.S. Nuclear Regulatory Commission
- Ken Bellis, So. Calif. Edison Co.
- Bud Jackley, So. Calif. Edison Co.
- Fred Massey, So. Calif. Edison Co.
- Cynthia Ferguson, City of San Juan Capistrano
- Ron Coleman, City of San Clemente
- Jim Hunt, San Diego County

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add: John Phillips 4000  
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