

STATE OF OHIO

ADJUTANT GENERAL'S DEPARTMENT

2825 WEST GRANVILLE ROAD
COLUMBUS, OHIO 43235-2712

EMERGENCY MANAGEMENT AGENCY

89
DOCKETED
USNRC
'90 OCT 18 P3:45

AGOH-EM-2B

October 12, 1990
SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, D.C. 20555

Dear Mr. Chilk:

Reference the NRC proposed rule to establish requirements that an applicant for renewal of a nuclear power plant license must meet (10CFR Part 54).

The Ohio Emergency Management Agency (Ohio EMA) intends to address relicensing only in the context of adequacy of emergency plans.

Ohio EMA does not fully support the Commission's proposed changes to 10 CFR Part 50.47 to clarify that no new finds on emergency preparedness will be made as part of license renewal.

In light of the above, and in response to Question 2 as published in the Federal Register on July 17, 1990 (55FR29043), Ohio EMA contends that there is a need to readdress Appendix E, Section II,G: "...a preliminary analysis that projects the time and means to be employed in the notification of State and local governments and the public in the event of an emergency. A nuclear power plant applicant shall perform a preliminary analysis of the time required to evacuate various sectors and distances within the plume exposure pathway EPA for transient and permanent populations, noting major impediments to the evacuation or taking of protective actions."

Also, referring to a Federal Register, dated May 9, 1980, on the Periodic Updating of Final Safety Analysis Reports. "The level of detail to be maintained in the updated FSAR should be at least the same as originally provided. Minor differences between actual and projected population figures or other such changes in the site environment need not be reported unless the conclusions of safety analyses relative to public health and safety are affected and the license has prepared new analyses as a result of NRC requirements."

9010310062 901012
PDR PR PDR
2 55FR29043

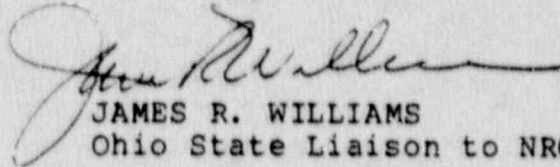
DS/O

There may be a need to provide guidance (from NRC) to review the evacuation time study periodically in light of changes to demographics (inter alia transportation network) and nearby hazards if the necessity arises. Changes in demographics become especially apparent as the time is extended in license renewal.

Through our sincere concern for safety and welfare of the public and economical operation of the current nuclear power structure, we have presented these comments. The Ohio Emergency Management Agency looks forward to the NRC response and enclosure of comments into the rule.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "James R. Williams".

JAMES R. WILLIAMS
Ohio State Liaison to NRC

JRW:liv