

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764 DOCKETED
COLUMBIA, SOUTH CAROLINA 29218 USNRC

September 2, 1982

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DOCKET NUMBER

PETITION RULE PRM-50-33

(47 FR 29252)

9

O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Chilk:

South Carolina Electric and Gas Company is providing comments as requested in Federal Register Notice 47FR18225, dated July 2, 1982, on the National Emergency Management Association (NEMA) March 17, 1982, petition for a change in the Nuclear Regulatory Commission (NRC) rulemaking regarding emergency planning.

As indicated in 47FR18225, the NEMA petition requests that current rules and regulations be revised to:

1. Each licensee at each site shall exercise annually its onsite emergency plan to test as much of the licensee emergency plan as is reasonably achievable.

The licensee exercises shall include participation by offsite agencies at the following frequencies:

- a. At least once every two years with full participation by local agencies and with at least partial participation by States within the plume exposure EPZ.
- b. At least once every seven years with full participation by local agencies within the plume exposure EPZ and full participation by States within the plume exposure and ingestion EPZs.
 - b.1. These exercises shall be more frequent than once every seven years as necessary to enable full participation in an exercise by each State within a plume exposure pathway EPZ at least once every two years.

Since 1979 and Three Mile Island, both state and local governments have moved rapidly in a short period of time in upgrading the emergency plans and programs of their agencies in response to nuclear power plant emergencies. These governmental agencies have demonstrated valuable cooperation and enthusiasm in accomplishing this planning effort at a time when budget cuts and reduction in manpower were on the rise. The current NRC position on state and local government participation in annual exercises will place a hardship on these agencies in terms of manpower and financial support.

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John Philips
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Michael Jamgochian
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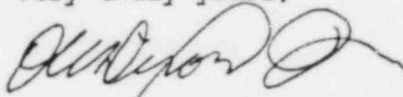
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Mr. Samuel J. Chilk
September 2, 1962
Page 2

South Carolina Electric and Gas Company agrees with NEMA that emergency exercises are needed if all participants are to be prepared to respond to an emergency at the nuclear power plant. It is our concern that the exercises will become too frequent and could jeopardize the cooperation and dedication demonstrated thus far resulting in a negative effect in the overall program. The concerns expressed by the NEMA petition on governmental agencies refusing to participate in the exercise are potentially real ones and cannot be overlooked.

We respectfully submit our support to the NEMA petition on emergency planning exercises. The acceptance of the proposed changes will continue to maintain an effective emergency preparedness program for all agencies and most importantly the general public.

Very truly yours,



O. W. Dixon, Jr.

KEB/vtw

cc: V. C. Summer	W. A. Williams, Jr.
G. H. Fischer	R. B. Clary
H. N. Cyrus	O. S. Bradham
T. C. Nichols, Jr.	A. R. Koon
O. W. Dixon, Jr.	M. N. Browne
M. B. Whitaker, Jr.	G. J. Braddick
J. P. O'Reilly	J. L. Skolds
H. T. Babb	J. B. Knotts, Jr.
D. A. Nauman	NPCF
C. L. Ligon (NSRC)	File



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DOCKET NUMBER
PETITION RULE PRM-50-33 '82 SEP -7 P2:48
(47 FR 29252)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DR. DONALD F. KNUTH
President

September 7, 1982

Mr. Samuel J. Chilk
Secretary to the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Petition for Rulemaking on Emergency Planning 47FR29252

Dear Mr. Chilk:

In September 1979, over twenty five utilities formed a Coordinating Group for Emergency Preparedness Implementation (CGEP) to work collectively with the NRC staff in the development and implementation of emergency planning criteria. The CGEP, identified in Enclosure 1, is providing comments as requested in 47 FR 29252 dated July 6, 1982 on the National Emergency Management Association (NEMA) March 17, 1982 petition for a change in the NRC rulemaking regarding emergency planning. In general, the petition requests that 10 CFR Part 50, Appendix E be amended to reduce the frequency and scope with which offsite agencies participate in emergency plan exercises conducted by nuclear power facilities. Biennial participation is recommended rather than the present annual participation.

In April 1982, the Commission considered a staff paper, SECY 82-130, Proposed Amendment to 10 CFR Part 50, Appendix E - Frequency of Emergency Preparedness Exercises. Alternative A of SECY 82-130 closely parallels the NEMA petition. That alternative also recommended a reduction in the frequency and scope of offsite agency participation. The NRC staff recommended that Alternative A be adopted as the amendment to Appendix E. The staff recommendation was supported by the Federal Emergency Management Agency. The Commission tabled the paper for reconsideration in one year.

Although the current regulations contain requirements which, in effect, impose NRC regulatory demands on States and local government bodies, and this proposed change relaxes these requirements, our predominate comment is that this type of requirement should be deleted in its entirety from the NRC regulations. FEMA is supposed to be the lead Federal agency dealing with offsite agencies and we believe any requirements of this

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John Philips
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Michael Jamgochian
1130 SS

Acknowledged by card. 9/17/82 emp

nature should be contained in FEMA's area of responsibility, and the NRC involvement should be channeled through FEMA through established Federal agreements for cooperation.

The CGEP Group supports the recommendations contained in the NEMA petition and believe, should the requirements not be deleted in their entirety, they should form the basis of an amended 10 CFR Part 50, Appendix E that addresses emergency preparedness exercises. We believe that the proposed frequency of offsite participation in emergency plan exercises will continue to assure that all the parties involved are capable of performing their duties competently. The proposed amendment would enhance emergency plans by permitting sufficient time between exercises to thoroughly analyze the exercise and take meaningful corrective action prior to the next exercise without the expenditure of an inordinate amount of resources by Federal, State, local government and licensee. However, any savings in resources will be totally negated and potentially increased by the proposed definition of "full participation." This definition increases the scope of exercises considerably above the scope of exercises contained in NUREG-0654/FEMA-REP-1 Rev. 1

NUREG-0654, Section N, Exercises and Drills, Evaluation Criterion 1.b., states, in part, "An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five year period.

The petition states, "Full participation when used in conjunction with emergency planning means all involved offsite agencies shall physically and actively take part in the exercise to test all major elements of the integrated plan. Similar language appears in SECY 82-130. Consequently, all major elements of the plan are tested each time an exercise is run. Therefore, the proposed scope of the exercises will probably require a significant increase in resources even though the frequency is reduced from annual to biennial.

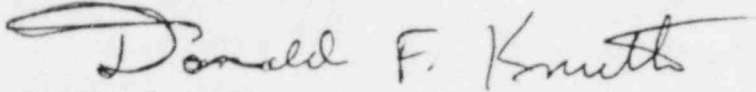
We recommend that the language defining "full participation" be modified to agree with that contained in Section N, NUREG-0654/FEMA REP-1 Rev. 1, except that, "all major elements of the plans and preparedness organizations are tested within a six-year period."

In a related matter, the Federal Emergency Management Agency has published in the Federal Register (Vol. 47, No. 161, Thursday, August 19, 1982) a proposed rule entitled, Review and Approval of State and Local Radiological Emergency Plans and Preparedness.

The language in the FEMA proposal differs from that in SECY 82-130 and NEMA petition. FEMA does not define "Full Participation." Rather, they define "Complete Exercises." The definition varies enough from the "full participation" definition to cause some confusion regarding the scope of the exercises to be conducted.

In summary, we believe that EPA and NRC rules, regarding emergency preparedness, be coordinated to eliminate ambiguity and overlap and that each agency develop its regulations directed only to that area where they exercise authority.

Sincerely,

A handwritten signature in cursive script that reads "Donald F. Knuth". The signature is written in dark ink and is positioned above the typed name.

Donald F. Knuth
KMC, Inc.

Enclosure

COORDINATING GROUP ON
EMERGENCY PREPAREDNESS

Arizona Public Service Company
Arkansas Power & Light Company
Baltimore Gas & Electric Company
Boston Edison Company
Carolina Power & Light Company
Cincinnati Gas & Electric Company
Cleveland Electric Illuminating
Commonwealth Edison Company
Consolidated Edison Company
Consumers Power Company
Detroit Edison Company
Edison Electric Institute
Florida Power Corporation
Florida Power & Light Company
GPU Service Corporation
Long Island Lighting Company
Maine Yankee Atomic Power Company
Mississippi Power & Light Company
Nebraska Public Power District
Northeast Utilities
Northern States Power Company
Omaha Public Power District
Pacific Gas & Electric Company
Pennsylvania Power & Light Company
Power Authority of the State of New York
Public Service Electric & Gas Company
Public Service Company of Indiana
Sacramento Municipal Utility District
Southern California Edison Company
Toledo Edison Company
Yankee Atomic Electric

LAW OFFICES

LOWENSTEIN, NEWMAN, REIS & AXELRAD, P. C.

1025 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036

202-862-8400

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USNRC

82 SEP -7 P3:20

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

ROBERT LOWENSTEIN
OF COUNSEL

September 7, 1982

JACK R. NEWMAN
CAROL F. REIS
MAURICE AXELRAD
KATHLEEN H. SHEA
E. A. BOUKNIGHT, JR.
MICHAEL A. BAUSER
DOUGLAS G. GREEN
DAVID G. POWELL
GREGORY BARNES
STEVEN P. FRANTZ
WILL E. GRANT
FREDERIC S. GRAY
ALVIN H. GUTTERMAN
POLLY N. LINDEMAN
DAVID B. RASKIN
DONALD J. SILVERMAN

11

DOCKET NUMBER
PETITION RULE PRM-50-33

(47 FR 29252)

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

Attn: Docketing and Service Branch

Dear Sir:

On March 17, 1982, the National Emergency Management Association (NEMA) submitted a petition for rulemaking requesting that the Commission amend its regulations in 10 C.F.R. Part 50 regarding emergency plans for production and utilization facilities. In essence, NEMA requests that the NRC reduce the required frequency of full-scale training exercises in which state and local governments are required to participate. The following comments in support of NEMA's request are submitted on behalf of the Houston Lighting & Power Company and Iowa Electric Light & Power Company in accordance with the "Notice of Receipt of Petition for Rule-making from the National Emergency Management Association" published in the Federal Register on July 6, 1982 (47 Fed. Reg. 29,252).

NEMA's petition is based primarily upon the high cost associated with the full-scale emergency response exercises currently mandated in Appendix E to Part 50. The estimates provided by NEMA in its petition range from \$80,000 for local governments, to \$300,000 for states. Clearly, the fiscal concerns expressed by NEMA are reasonable and significant, especially in light of the current economic climate.

In our view, these very real and substantial economic burdens far outweigh any minimal adverse impact on emergency

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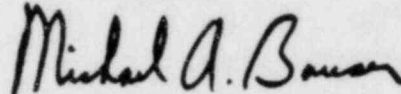
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Secretary of the Commission
September 7, 1982
Page Two

response capabilities which might occur if full-scale training exercises were to be required at the frequency requested by NEMA. We agree with NEMA's position, implicit in its petition, that local and state involvement in exercises at the frequency currently required under NRC regulations is not necessary to maintain an adequate level of preparedness. Moreover, the Commission's Supplemental Information statement, which accompanied the emergency planning regulations (45 Fed. Reg. 55,402), provides no justification for the Commission's decision to require the presently prescribed level of participation by local and state officials in full-scale exercises.

We believe that the NEMA position constitutes an effort by localities and the states to work with the Commission to ensure that their limited resources are used most effectively to protect the public health and safety, and that it would be in the public interest to adopt the NEMA proposal.

Sincerely,



Michael A. Bauser

MAB:cfw

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USNRC



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September 2, 1982

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

12

DOCKET NUMBER

PETITION RULE PRM - 50-33

(47 FR 29252)

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

Attn: Docketing and Service Branch

Dear Sir:

On July 6, 1982, notice was published in the Federal Register (47 Fed. Reg. 29,252), acknowledging receipt of a Petition for Rulemaking from the National Emergency Management Association (NEMA). Submitted on March 17, 1982, to the Commission, the subject petition expresses the view of state emergency services program directors that the present 10 CFR Part 50, Appendix E requirement for an annual exercise with state and local government participation, at each nuclear power plant site within a state, imposes an impossible burden on state resources.

NEMA has essentially requested that the NRC reduce the required full-scale training exercise frequency wherein state and local government must participate. The rationale of the subject petition is primarily to reduce unnecessary cost associated with annual full-scale emergency response exercises now mandated by 10 CFR Part 50, Appendix E. Such cost has been estimated by NEMA in its petition to be approximately \$80,000-\$100,000 for local government and \$150,000-\$250,000 for state government.

Regardless of whether the state and local governments directly fund the above expenditures, or funding is achieved through the ratepayers of the utility via state legislation, economic resource utilization must be balanced against any incremental improvement in emergency response capability which might result from the current annual full participation requirement of 10 CFR Part 50, Appendix E. Full participation by state and local government "at least once every two years" (Proposed 10 CFR Part 50, Appendix E, section IV.F.1.a) would most adequately maintain a proper level of preparedness, especially since initial "Full Participation" has been adequately demonstrated at nuclear power plant sites. In addition, the Commission's Supplemental Information statement accompanying the emergency planning regulations (45 Fed. Reg. 55,402), provided no justification for present levels of state and local government participation in full-scale exercises.

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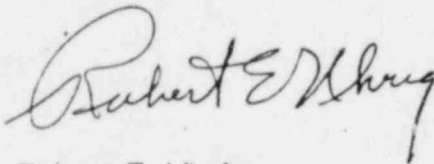
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Page 2
September 2, 1982
Secretary of Commission
U. S. Nuclear Regulatory Commission

It is felt that the subject NEMA petition would best utilize state and local economic resources, to efficiently protect the public health and safety, and that the interest of the public is best met by adoption of the NEMA proposal.

Sincerely,

A handwritten signature in cursive script, reading "Robert E. Uhrig". The signature is written in dark ink and is positioned above the typed name.

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/DAC/cab

cc: Michael A. Bauser (Lowenstein, Newman, Reis and Axelrad)
Howard D. Johnson (FPL)
Mario Villar (FPL)

13

DUKE POWER COMPANY
P.O. BOX 5830
CHARLOTTE, N.C. 28242

DOCKET NUMBER
PETITION RULE PRM-50-33
(47 FR 29252)
TELEPHONE
(704) 373-4531

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

82 SEP -7 P4:21
August 31, 1982

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attention: Docketing & Service Branch

Subject: Petition for Rulemaking Regarding Change to Frequency of
Emergency Preparedness Exercises; Duke Power Company Comments

Dear Sir:

Duke Power Company is pleased to take this opportunity to comment on the subject
Petition for Rulemaking (PRM).

The Company fully agrees with the need to reduce the burden on state and local
agencies with respect to their participation in emergency preparedness exercises.
Both utilities and government agencies face increased costs for such proceedings
in the future; the general public, of course, sees these costs in the form of
increased rates and taxes. The benefits realized by these exercises do not
justify the increased costs. Accordingly, a revision to the requirements for
preparedness exercises is in order. However, the change as proposed in the
PRM will have a major impact on the philosophy by which Duke and other licensees
conduct preparedness exercises. Currently, 10 CFR 50, Appendix E requires that
each site conduct a full-scale exercise (i.e., full participation of state and
local governments) at least every five years. During those years when a full-
scale exercise is not conducted a small-scale (i.e., limited local and state
involvement) exercise shall be conducted. This provision is not included in
the PRM. The PRM would require that exercises be performed "at least every two
years with full participation by local agencies and with at least partial partici-
pation by local agencies and with at least partial participation by states within
the plume exposure EPZ." Full participation by local agencies every two years
would result in an increase in cost of emergency preparedness exercises rather
than, as the PRM intended, a decrease. Therefore, the following change to
10 CFR 50, Appendix F, IV, E is proposed in place of the PRM:

1 A full scale exercise which tests as much of the licensee, state, and local
emergency plans as is reasonably achievable without mandatory public partici-
pation shall be conducted:

- a. For each site at which one or more power reactors are located and
licensed for operation, at least once every seven years with full
participation of local governments within the plume exposure EPZ
and states within the plume exposure and ingestion EPZs.
- b. Prior to issuance of a full-scale power license for each site at
which a power reactor is located for which the first operating
license for that site is issued after the effective date of this
amendment, which will enable each state government in the plume

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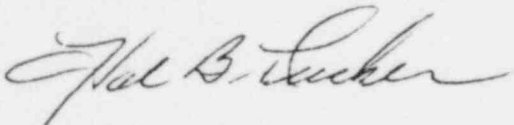
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exposure and ingestion EPZs and each local government in the plume exposure EPZ to participate.

2. The plan shall also describe provisions for involving Federal emergency response agencies in a full-scale emergency preparedness exercise for each site at which one or more power reactors are located and licensed for operation at least once every five years.
3. A small-scale exercise which tests the adequacy of communications links, establishes that response agencies understand emergency action levels, and tests at least one other component (e.g., medical or offsite monitoring) of the onsite and offsite emergency plans shall be conducted at each site at which one or more power reactors are located and licensed for operation each year a full-scale exercise is not conducted which involves the state(s) within the plume exposure EPZ. Small-scale exercises shall include licensee and local government participation. Offsite agencies shall actively take part in the small-scale exercise such that the communications links, ability to understand EALs, direction and control functions (protective action decision making and communications capabilities), and one other component (e.g., medical or offsite monitoring) are tested.

In closing, it should be noted that on August 19, 1982, the Federal Emergency Management Agency (FEMA) published for comment in the Federal Register a proposed rule on this same issue. The NRC should strive to ensure that the two agencies promulgate regulations which are consistent.

Very truly yours,



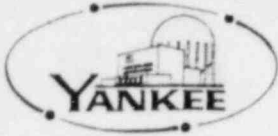
Hal B. Tucker

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YANKEE ATOMIC ELECTRIC COMPANY

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1671 Worcester Road, Framingham, Massachusetts 01701

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BRANCH

14

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

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Subject: National Emergency Management Association Petition (Docket
No. PRM-50-33)

Dear Sir:

Yankee Atomic Electric Company appreciates the opportunity to comment on the subject document. Yankee Atomic owns and operates a nuclear power plant in Rowe, Massachusetts. The Nuclear Services Division also provides engineering and licensing services for other nuclear power plants in the Northeast including Vermont Yankee, Maine Yankee, and Seabrook 1 and 2. We support the subject NEMA petition to amend 10CFR50, Appendix E, as published on July 6, 1982 at 47FR29252.

We feel that the proposed change to 10CFR50 reflects an understanding by petitioner (NEMA) of the proper level of off-site agency exercise participation, especially considering the availability of the local emergency response personnel to participate in such exercises. Towns located within the plume EPZ's of Power Stations rely on volunteers to staff their emergency response organization. In order to participate in an exercise, volunteers must take time off from their place of business or work (in many cases without pay). Both volunteers and their employers experience hardships whenever an emergency plan exercise is conducted, particularly during these times of a troubled economy.

Yankee Atomic believes that the proposed biennial frequency for exercising emergency plans would be less burdensome to parties affected off-site than the current annual frequency, but with no reduction in the capability of off-site agencies to respond in case of an actual emergency.

We would go even further than petitioner NEMA, however, to recommend that exercises be conducted only every seven years, at the full participation level for local agencies and states. Thus, our opinion is that NEMA's proposed biennial frequency, for full participation by local agencies and partial participation by states within the plume-exposure EPZ, is very conservative. State agencies are continually activated under actual non-nuclear emergency

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ADD: John Philips
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Michael Jamgochian
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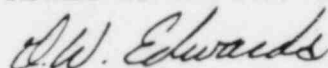
Secretary of the Commission
September 3, 1982
Page 2

situations. Public notification, communication links, evacuation, traffic control, reception centers, and other essential elements of emergency planning are thereby implemented in a realistic fashion. The proposed amendment would permit sufficient time between exercises for improving emergency plans, but without excessively taxing the resources of either federal, state, and local governments, or licensees of nuclear power plants.

In conclusion, we believe that the proposed reduction in frequency and scope of off-site participation in emergency exercises will continue to assure that all the response agencies involved are capable of performing their assigned tasks. It is our view, therefore, that the petition for rulemaking should be approved.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



D. W. Edwards, Director
Operational Projects

REH:dd

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USNRC

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September 3, 1982

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

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

ATTENTION: Docketing and Service Branch
PRM-50-33

Dear Sir:

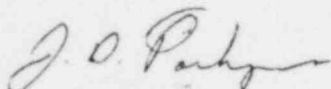
I wish to write in support of the proposed rule change with two exceptions:

- (1) The licensee at each site should be required to exercise their plan once every two years rather than annually. The continued diversion from attention to plant operation provided by the annual drill is an unnecessary risk to the public.
- (2) The local agencies should be required to participate only once per three years. Frankly, you have cried wolf so often that our county people are getting tired of the game. Local citizens tend to be wary of things which are frequently repeated and take needed people protecting health services and highway crews away from providing public service and divert them into drills.

This is an area of limited manpower resources for unneeded exercises. The fact that the utility pays local government costs does not negate the loss of offduty time for county personnel while they run around on drills. You are getting these people so familiar that contempt will set in and greatly impair their response should a real emergency ever occur.

Please expedite this rule change.

Sincerely yours,



J. D. Parkyn
Chairman of the Personnel Committee
The Vernon County Board of Supervisors

DS11
ADD: John Philips
4000 MNBB
Michael Jamgochian
1130 SS



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USNRC

GPU Nuclear Corporation
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Parsippany, New Jersey 07054
201 263-6500
TELEX 136-482
Writer's Direct Dial Number:

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
September 3, 1982

16

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

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket No. PRM-50-33

Dear Mr. Chilk:

The staff of GPU Nuclear Corporation herewith submits comments on the National Emergency Management Association petition for rulemaking to reduce the frequency of state and local government participation in emergency training exercises. Comments were requested in a July 6, 1982 Federal Register notice (47 FR 29252).

We support the proposed revisions. In our judgement they would result in a more realistic exercise frequency which would reduce the financial burden currently imposed on state and local government agencies without compromising the state of emergency readiness in the vicinity of nuclear power plants.

We recommend the following additional revisions:

1. To provide relief to those local government agencies that fall within the plume exposure pathways of two or more licensees, we recommend that the following words be added to the end of Section IV.F.1.a:

"Local Agencies that are located within two or more licensees' plume exposure pathway EPZ's must fully participate with only one licensee once every two years and partially participate every other year."

2. To minimize the potential for licensees to be unduly penalized if they are unable to obtain exercise support from state and local governments, we urge that the following words be added to the end of Section IV.F.3 of Appendix E:

"The NRC will evaluate on a case by case basis those isolated cases where the licensee is in full compliance with the above and has made a reasonable attempt to obtain state and local government support but failed to do so. These types of problems will be turned over to FEMA for resolution with the appropriate government agency."

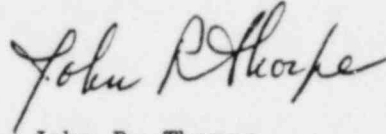
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John Phillips
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Michael Jamgochian
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Under the existing language of Section IV.F, licensees could be subjected to enforcement action for failing to obtain the support of state and local governments, even if they have expended their best effort in doing so. In our opinion, this places an unfair burden on licensees.

Sincerely,

A handwritten signature in cursive script that reads "John R. Thorpe".

John R. Thorpe
Director
Licensing & Regulatory Affairs

JW:dls

cc: R. Jacobs, NRC
J. Lombardo, NRC

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USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

5421 Zion Road
LaCrosse, WI 54601

September 3, 1982

DOCKET NUMBER 18
PETITION RULE PRM - 50-33

(47 FR 29252)

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

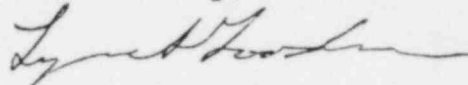
ATTN: DOCKETING AND SERVICE BRANCH

Dear Sir:

I agree the proposed rulemaking on Docket No. PRM-50-33 on emergency exercises is a step in the right direction. Conducting annual exercises at nuclear facilities is a waste of time and money, both on the part of the utility and the local law enforcement agencies. Everybody ends up paying for it, through taxes and electric bills. I do not want my money spent that way, nor do I want my sheriff playing games when some real problem could occur. I also think the utility should be spending more of their time operating the plant safely, rather than on "What if" games.

I feel the intervals should be lengthened even further, to prevent this waste of manpower and money. More logical intervals would be every 2 years for the licensee, every 3 or 4 years with local agencies, and every 10 years with full participation by the State.

Yours truly,



Lynne S. Goodman

LSG:dh

DS11
ADD: John Philips
4000 MNBB
Michael Jamgochian
1130.SS

Acknowledged by card

9/17/82 emp