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October 22, 1982

Peter B. Bloch, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Consumers Power Company
(Big Rock Point Plant
Docket No. 50-155
(Spent Fuel Pool Modification)

Dear Administrative Judges:

On August 6, 1982, this Licensing Board issued an Initial Decision authorizing the proposed emergency preparedness pamphlet for Big Rock Point Nuclear Plant. It directed certain language to be included in the section entitled "What if I am instructed to evacuate?" (Slip Op. p. 12). Part of this language derived from the Applicant's emergency preparedness pamphlet for the Palisades Nuclear Station provided:

If you are asked to evacuate, first put on a dust mask or breath through a damp handkerchief to filter out any dust in the air.

See Pamphlet entitled "Emergency Preparedness," p. 8, Attachment 1 to Testimony of P. B. Loomis, ff. Tr. 1038.

This language has been incorporated into the language of pamphlets for the Big Rock Point facility which will be distributed to assure emergency preparedness for that facility.

However, the Staff has recently been informed that the technical staff of the NRC's Office of Inspection and Enforcement views the language as technically unsound and contrary to NRC protective action recommendations. The NRC Staff does not believe respiratory protection measures to be an appropriate routine measure during or as a precondition for evacuation of the population surrounding a nuclear power station should evacuation be ordered

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because of an onsite emergency. Evacuation would normally be initiated as a precautionary measure some time prior to any actual release of radiation which might occur. Respiratory protection measures such as the use of simple masks or damp handkerchiefs should only be utilized if specifically directed by off-site authorities at the time of an accident. Such measures would be appropriate only when radioiodines or particulate material is released and would normally be advisable only when sheltering, rather than evacuation, is ordered. On the other hand, the NRC technical staff believes that instructions to place a dust mask or hold a damp handkerchief on the face could serve to delay or inhibit the departure of people in the emergency planning zone. The wearing of such a mask or the holding of a damp handkerchief on the face could make people inefficient and slow evacuation times. It could, also, interfere with driving and create a safety hazard.

For these reasons, the Office of Inspection and Enforcement, Region III, located in Glen Ellyn, Illinois, has telephonically advised Staff counsel that it intends to notify the Applicant that it deems the quoted language to be erroneous, and to constitute a possible threat to public health and safety if an evacuation were ordered. It further intends to request that the Applicant revise the Palisades emergency preparedness pamphlet, and at the time of the next annual revision and distribution, the Big Rock Point pamphlet, to delete the quoted language. NRC counsel does not believe that this modification in future editions of the pamphlets would contravene the order or intention of the Licensing Board. However, counsel is advising the Licensing Board of the proposed modifications in future editions of the pamphlets before they take place in order to avoid any question of non-compliance with the Board's order upon the publication of future editions of the pamphlets.

Sincerely,

Richard J. Goddard
Counsel for NRC Staff

cc: Philip P. Steptoe, Esq.
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