



TU ELECTRIC

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OFFICE OF SECRETARY
DOCKETING SECTION

C. Lance Terry
Group Vice President

Mr. John C. Hoyle
Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555

DOCKET NUMBER
PETITION RULE PRM 50-63
(60FR 58256) (35)

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
COMMENTS ON PETITION FOR RULEMAKING FILED BY
PETER G. CRANE

REF: 60 FR 58256 - November 27, 1995

Dear Mr. Hoyle:

TU Electric recommends that the NRC deny the petition filed by Mr. Peter G. Crane that requests the NRC amend its regulations concerning emergency planning to include a requirement that emergency planning protective actions for the general public include sheltering, evacuation and the prophylactic use of potassium iodide (KI). TU Electric also endorses the detailed comments being provided by the Nuclear Energy Institute (NEI) on the subject Federal Register Notice.

The current federal policy, formulated by the Federal Radiological Preparedness Coordinating Committee (15 federal agencies) in 1985 regarding stockpiling and distributing KI during emergencies for emergency workers and institutional persons, but not the public, should remain in effect.

TU Electric's recommendation to deny Mr. Crane's petition is not based on concern for KI's initial and periodic replacement costs. Potassium iodine is relatively inexpensive at approximately a dollar per a bottle of fourteen 130 mg tablets. Our recommendation to deny Mr. Crane's recommendation to make potassium iodide available to the public is based primarily on our belief that the most effective protective measure for the public would be their evacuation. On the basis of EPA-400, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents", evacuation should take place when the projected dose (whole body and organ or TEDE and CEDE) would exceed one (1) rem. The same document recommends ingestion of stable iodine only if the projected dose (CEDE) would exceed 25 rem and would require the approval of the state medical official.

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TU Electric recommends that the NRC consider the following:

- o Mr. Crane's advocacy of potassium iodide predistribution is likely to be perceived by the public as a sure-fire and all-purpose means for self protection for all physical and chemical forms of radionuclides. The public may believe that the first choice for self protection for any projected radionuclide exposure is drugging themselves with potassium iodide; if so, then they have been given a false sense of security.
- o To be an effective thyroid blocking agent, KI (non-radioactive iodide tablet) should be taken prior to inhaling radioactive iodine. It is unlikely, regardless of the extent of predistributed KI within the plume exposure pathway, that quantifying the need for and getting KI into the hands of individuals will occur in time to be effective.

The present regulations and the current federal guidance adequately address the concern for protection of the public.

Sincerely,

C. L. Terry

By: 

J. S. Marshall
Generic Licensing Manager

CLW/vld

c - John F. Schmitt, NEI