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BRANCH

February 12, 1996
NRC-96-0010

Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attn: Docketing and Services Branch

DOCKET NUMBER
PETITION RULE PRM 50-63
(60FR 58256) (52)

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Federal Register, Vol. 60, No. 227, pages. 58256-58259, dated
November 27, 1995 (60 FR 58256)

Subject: Comments on Petition for Rulemaking Regarding Use of Potassium Iodide (Docket No. PRM-50-63)

Detroit Edison has reviewed the reference 2 petition proposing to amend 10 CFR 50.47 filed by Peter G. Crane, and submits the following comments.

The proposed petition recommends that the planning standard for protective actions for the general public be revised to include the prophylactic use of potassium iodide. Detroit Edison and the offsite authorities in its emergency planning zone currently have plans in place to administer potassium iodide to emergency workers if a large thyroid dose (25 Rem) is anticipated. These plans are necessary because emergency workers may be required to remain in the affected area. EPA-400 guidance is for the evacuation of personnel when a much lower thyroid dose (5 Rem) is anticipated. Detroit Edison considers this a more effective means of dose avoidance for the general public.

A radioactive release from a nuclear power plant that results in a substantial thyroid dose would undoubtedly include a significant whole body dose as well. Potassium iodide offers no protection for this dose. Detroit Edison is concerned that if plans were in place to administer potassium iodide to the public, the potential would be created for evacuation orders to be ignored due to perceived protection by potassium iodide.

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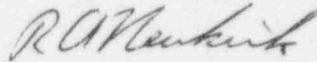
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Detroit Edison urges the Nuclear Regulatory Commission to deny Mr. Crane's petition.

If there are any questions, please contact me at (313) 586-4097.

Sincerely,



for Lynne S. Goodman
Director, Nuclear Licensing

cc: T. G. Colburn
M. J. Jordan
H. J. Miller
A. Vogel
NEI