

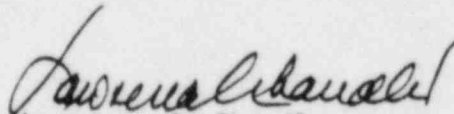
January 12, 1984

Note to: Dave Matthews

MEMORANDUM ON EMERGENCY PLANNING AND SEISMIC HAZARDS

Although OELD has signed off on the referenced memorandum to Chairman Palladino, noting no legal objection, we would offer two comments which, we believe, would contribute to the completeness of the effort. First, on page 4, if, in spite of our earlier comments, specific provisions of NUREG-0654 are to be cited without reference to the other provisions noted in the EDO's June 1982 memorandum to the Commissioners, the introductory sentence should make clear that those provisions included are not intended to be all-inclusive but rather are only examples.

Second, on page 5, first full paragraph, the example of an improvement which could result from clarification of existing provisions (i.e., more refined analysis of road blockage, etc.) seems too limited and vague. For example, clarification of Planning Standard F, which calls for "reliable primary and backup measures of communication . . .", Planning Standard I regarding accident assessment (criteria 5, 7) Planning Standard J, regarding protective responses (criteria 8, 10.k and 10l), and likely others, might well contribute to an improvement in emergency response capabilities if clarified to explicitly include consideration of earthquakes. Further, the use of "etc." leaves one in the dark as to the nature of other possible benefits, for example, those noted above. Finally, an explanation of why it is not possible to judge whether "such improvements would substantially reduce the impairment of emergency response caused by seismic damage offsite" should be provided.



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