Attachment 5

CALLAWAY COUNTY-FULTON EMERGENCY MANAGEMENT AGENCY Route #1 Kingdom City, Missouri 65262

13 May 1981

SUBJECT: Clarification of Document symbols and terminology

TO: NRC/FEMA Steering Committee Nuclear Regulatory Commission Washington, D.C. 20555

INFO: Mr. James P. Gleason, Esquire; Chairman Atomic Safety and Licensing Board 513 Gilmoure Drive Silver Spring, MD. 20901

Gentlemen:

Reference NUREG 0654 FEM-REP-1, Rev. 1, dated November 1980; Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

In discussions with planning personnel at State and Utility levels, a conflict in defination of wording and symbols has arisen. Your clear response to the following questions will resolve this matter.

Example: (H. Emergency Facilities and Equipment - pg 55)

AL 1	
State	Local
x	X
	<u>x</u>

Question 1: Does "Each organization" indicate a mandatory requirement for an action to be performed by the organization indicated by the letter "X"?

Question 2: Does the letter "X" fulfill the requirement of "juidance" as used in APPENDIX 5, GLOSSARY, final paragraph, page 5-2? "Where the guidance in this document indicates a function that must be performed, emergency planners at all levels, must decide and agree among themselves, which organization is to perform such function. As a minimum, one lead agency at the State level and one lead local government agency having 24 hour manning is required."

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Question 3: Does the "minimum requirement" in the last sentance of the above quoted text place a requirement for duplicate effort or contabilities at State and Local governmental levels as assurance that the public health and safety will be adequately provided for in the event either State or Local government fails to function as planned?

I crytend that local government is the first line of defense in any protective action taken which provides for public health and safety. To accept a "lame duck" role in emergency radiological response plans is to abrogate logal responsibility as provided in law for local elected officials. As I interpret NUREC 0654; each "X" places a formal requirement for action by the entiety designated (Licensee, State & Local). Where two or more entieties are designated, a multiple capability must exist and compliance is a cooperative effort guaranteeing public protection. Only the lead role for the activity need be determined by those concerned.

Unless the emergency response capability at the local level of government is viewed as a full partnership with the State and Licensee, it should be eliminated as a requirement for local governments and the responsibility placed directly upon the Governor's Office of each state involved. If it is to be a "full partnership", it must have an independent capability to verify information received and act in the absence of outside assistance should a situation ever arise wherein public health and safety is imperiled.

Your timely response to this communication will greatly assist in the review of Licensee and State interim plans which are currently being conducted by this office.

Sincerely: John G. Reed Director

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of UNION ELECTRIC COMPANY

(Callaway Plant, Unit 1)

Docket No STN 50-483

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Addition of Document to Mr. Reed's Further Particularization of Reed's Contention 1 and Contention 3 were served this <u>Y2</u> day of <u>Jime</u>, 1981 by deposit in the U.S. mail, first class postage prepaid, to the parties named on the attached Service List.

G. Reed

Citizen of the United States of America

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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