

JUN 17 1985

Docket No.: 50-440

Mr. Russell M. Bimber  
10471 Prouty Road  
Painesville, Ohio 44077

Dear Mr. Bimber:

My letter to you dated May 24, 1985, advised that the Federal Emergency Management Agency (FEMA) would be responding to your concerns relative to the Perry plant Offsite Emergency Preparedness Plan, which you expressed during the Limited Appearance session at the Perry hearing on April 11, 1985.

This letter contains the NRC staff's responses to your concerns regarding emergency planning in general, which are enclosed.

If you have any further concerns or questions relative to the enclosed responses, please do not hesitate to contact me. If you have any questions on offsite emergency preparedness at Perry, it is suggested that you contact the FEMA Regional Office at:

Director, Federal Emergency Management Agency  
Region V  
300 S. Wacker Drive - 24th Floor  
Chicago, Illinois 60606

Sincerely,

John J. Stefano, Project Manager  
Licensing Branch No. 1  
Division of Licensing

Enclosure:  
NRC Responses to Concerns on Perry  
Plan Emergency Planning

cc: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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Region V  
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Chicago, Illinois 60606

Sincerely,

A handwritten signature in dark ink, appearing to read "John J. Stefano", is written over the typed name and title.

John J. Stefano, Project Manager  
Licensing Branch No. 1  
Division of Licensing

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Plan Emergency Planning

cc: See next page

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NRC Responses to Mr. Bimber's Concerns  
on Perry Plant Emergency Planning

Concern No. 1. EPA 520/1-75-001 allows the public to be exposed to whole body radiation fifty to a thousand times the limit for unrestricted areas set by prior Federal law.

Answer: First, the 100 millirems per week, not to exceed two millirems per hour, that you quoted from 10 CFR 20.105 pertains to permissible levels of radiation in unrestricted areas as a result of routine possession or use of radioactive materials and other sources of radiation. Second, the Protective Action Guides (PAGs) in the Environmental Protection Agency's "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," EPA-520/1-75-001, that you referenced pertain to the projected dose to individuals in the population which warrants taking some kind of protective action (e.g., sheltering or evacuation). The PAGs are not to be construed as an acceptable dose. They are numerical values which serve as action points to initiate protective action so as to minimize risk from an event which is occurring or has already occurred. As stated in the EPA's manual, "The guides for the general population....were arrived at in consideration of protection of the public from the early effects of radiation and maintaining the delayed effects at a low probability." A principal objective of emergency planning is to take protective actions before any of the public is exposed to radiation during an emergency situation. Onsite emergency response plans are developed for, 1) early detection and

classification of the event, 2) prompt notification of State and local authorities and the public, 3) onsite response to mitigate the emergency and 4) making protective action recommendations to appropriate authorities.

The Perry Plant emergency plan has adopted the EPA PAGs for the plume exposure EPZ and the FDA guidelines for protection against ingestion of contamination (Ref. FDA Federal Register Notice, October 1982).

The NRC has reviewed and evaluated the Perry Plant emergency plan and finds that it meets the emergency planning standards and guidance of the NRC.

Concern No. 2. A serious discrepancy exists between the statement in NUREG-0884, Final Environmental Statement, page 5-16, that releases will remain well within the limits of 10 CFR 20, even under unusual operating conditions, and Perry's adoption of 1-5 Rem PAGs, on page 6-17 of its Final Safety Analysis Report.

Answer: The Final Environmental Statement (FES), Section 5.9, "Radiological Impacts " pp. 5-15, 5-16, deals with the regulatory requirements that must be met in order to operate a nuclear power reactor. On page 5-16 of the FES, the staff states that, "Experience with the design, construction, and operation of nuclear power reactors indicates that compliance with these design objectives will keep average annual releases of radioactive material in effluents at small percentages of

the limits specified in 10 CFR 20 .... even under unusual operating conditions which may temporarily result in releases higher than such small percentages but still well within the limits specified in 10 CFR 20." In this instance, the staff is not referring to Site Area or General Emergency conditions when it talks about "unusual operating conditions." Section 5.9.4.1 of the FES deals with plant accidents that result in a release of radioactive materials to the environment in excess of permissible limits for normal operation specified in 10 CFR 20 and 10 CFR 50, Appendix I.

As explained in our answer to your first concern regarding the PAGs, the PAGs of 1-5 Rem projected whole body exposure are not acceptable doses, nor are they dose limits used during routine operations. They are action levels which initiate predetermined protective actions for the public during emergency conditions.