



JOHN ENGLER, Governor

DEPARTMENT OF STATE POLICE

COL. MICHAEL D. ROBINSON, Director

EMERGENCY MANAGEMENT DIVISION

4000 COLLINS ROAD
P.O. BOX 30636
LANSING, MI 48909-8136

August 28, 1998

Mr. Aby Mohseni
Division of Incident Response
Office for Analysis and Evaluation of Operational Data
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Mohseni:

The Michigan State Police, Emergency Management Division (EMD), would like to take this opportunity to comment on draft NUREG-1633 "Assessment of the Use of Potassium Iodide (KI) as a Public Protective Action During Severe Reactor Accidents."

The EMD is the agency in Michigan charged with the overall coordination of emergency planning and response to an accident at a commercial nuclear power plant under Public Act 390, as amended. The EMD assists both state and local government agencies in the development of appropriate plans and procedures for emergency response. This agency also provides training assistance, and coordinates exercises and drills aimed at demonstrating adequacy of plans and procedures to protect public health and safety. All plans were initially reviewed by FEMA for compliance with federal guidance, and are now reviewed annually.

In developing a recommendation to the Governor for his protective action order, the EMD relies on a number of agencies to provide technical support and analysis. These agencies include the Michigan Department of Environmental Quality-Radiation Protection Section, the NRC, the affected utility, and the Technical Support Group in the State Emergency Operations Center.

In our view, NUREG 1633 is a valuable addition to the NRC documents available to the states in developing emergency response plans and implementing procedures. It encapsulates the information and experiences related to the use of KI as a protective measure during a radiological emergency. The state has always considered the issuance of KI during a radiological emergency as a valuable, and appropriate protective measure for emergency workers who may have to enter affected areas, and for institutionalized persons who cannot be evacuated from affected areas. The state has felt, and continues to feel, that the prompt evacuation of the general public from the area around the plant is the most effective protective action. In the development of implementing procedures, the state did consider the issuance of KI to the public as a protective measure, but felt that evacuation and in-place shelter were the most appropriate measures. The State of Michigan recently changed its default protective action procedures, in conjunction with the affected utilities in Michigan, to one that embraces NUREG 0654, Sup 3: default evacuation of all sectors to 2 miles and downwind to 5 miles in affected sectors, unless plant conditions or radiation readings/projections indicate otherwise.

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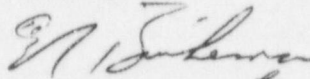
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We feel that a new rulemaking by the NRC on the use of KI as a protective measure by the general public is not warranted, as the states have always had the option to issue KI to the public. The information presented in the document does not lead us to a change in state policy at this time. We concur with the comments made by the Michigan Department of Environmental Quality-Radiation Protection Section, regarding the risks associated with the use of KI. The NRC is to be complimented on their analysis of this issue and the comprehensive nature of NUREG 1633.

If you have any questions, please feel free to contact Mr. Daniel Sibb at 517-333-5021.

Sincerely,



Captain Robert C. Tarrant
Deputy State Director of
Emergency Management

cc: Ms. Ellen Karpe, Consumers Energy
Mr. Dennis Coope, AEP
Mr. Kevin Morris, Detroit Edison
Mr. David Anaar, DEQ