

**ENERGY
NORTHWEST**

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PROPOSED RULE **PR 50**
(64FR31737)

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RULE
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Docket No. 50-397

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTENTION: Rulemakings and Adjudications Staff

**SUBJECT: PROPOSED RULE: CONSIDERATION OF POTASSIUM IODIDE IN
EMERGENCY PLANS (64 Fed. Reg. 31737-JUNE 17, 1999)
RESPONSE TO REQUEST FOR COMMENTS**

Energy Northwest submits these comments in response to the Proposed Rule: Consideration of Potassium Iodide in Emergency Plans (64 Fed. Reg. 31737-June 17, 1999). We have reviewed the proposed rulemaking to amend the emergency planning standard in 10CFR50.47 (64 Fed. Reg. 31737-June 17, 1999). The proposed petition recommends that the planning standard for protective actions require explicit consideration of the prophylactic use of potassium iodide (KI) for the general public.

We strongly urge the NRC to deny the petition and to retain the current policy for KI usage.

U.S. programs are built on the premise that evacuation is generally feasible and is more effective at dose reduction because it reduces dose to all organs, not just the thyroid. Energy Northwest and the majority of commercial nuclear power plants have adopted the protective actions described in the NRC Response Technical Manual (NUREG/BR-0150) to evacuate the general population in the event of severe core damage. The Response Technical Manual also goes on to recommend the stockpiling or distribution of KI during emergencies for emergency workers and institutionalized persons but does not recommend requiring predistribution or stockpiling for the general public.

Energy Northwest strongly believes that the current policy on distribution of potassium iodide for use as a thyroid blocking agent is sound and will provide adequate protection of public health. The safety record of the U.S. commercial nuclear power program and demonstrated strength of its current emergency preparedness programs supports the continuation of current practices for the distribution of KI.

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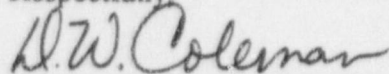
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In addition, the proposed rule fails to provide any new evidence that stockpiling or predistribution of potassium iodide as a protective action will add significant public health and safety benefit to the adequate level of protection currently provided by existing emergency planning at and around commercial nuclear power plants. Furthermore, guidance is already available for state and local governments that wish to make KI available to the general public if they feel it is appropriate.

Energy Northwest agrees with the stipulation in the proposed rule that the state and local authorities should make the determination regarding stockpiling and distribution of KI. The cost of purchasing and development of plans and procedures should not be the burden of the nuclear industry.

We appreciate the opportunity to comment on the proposed rulemaking. If you would like to discuss our comments further, please do not hesitate to contact Tim Messersmith at (509) 377-8568.

Respectfully



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Manager, Regulatory Affairs

DWC:rej