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General Comment

Intersection Control – Section 3.3 – Pages 3-4 and 3-5

Manned traffic controlled intersections are discussed in Lines 15 through 36. The counties and states within the EPZ of each plant in the U.S. typically have a Traffic Management Plan (TMP) that consists of Traffic Control Point (TCPs) where a police officer will control traffic during an evacuation. Most of the plans were developed when the plant was first licensed, and they have been refined and typically expanded over the years. Many of these plans have many more TCPs identified than they have police officers on duty at any given time. Many Offsite Response Organizations (OROs) operate under the assumption that all the TCPs identified in their TMP must be manned during an evacuation as this question has come up from federal regulators during drills and exercises.

We very much agree with the text that is written in this section of the draft guidance document, specifically the text in Lines 25 through 27, reading "Modeling of manual traffic control (MTC) at intersections should be limited to key locations where it is believed that MTC would be necessary and can be readily implemented. Extensive use of manned traffic control at intersections should not be assumed." This has been an issue for many years. Developing a TMP that is responsible and in line with available resources and manpower would be prudent emergency planning. The ETE analysis can help to identify the few TCPs that are most critical and require MTC. Should the OROs be encouraged to revise their TMP after the completion of the ETE study to emphasize only those few TCPs?

The text on page xii in the Executive Summary of this guidance document states "It is important to use the information found in approved emergency plans when developing an ETE study to ensure that the results represent the expected response from authorities." If an ORO's emergency plan includes a TMP with an excessive number of TCPs, this text in the guidance document could be interpreted as meaning the ETE

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would have to model the excessive number of TCPs to be compliant with what is in the existing emergency plans. If the ETE analysis deems the existing TMP in an ORO's emergency plan to be excessive, does the ORO have to revise and approve their emergency plan prior to completing the ETE study such that the ETE study is in agreement with the approved emergency plans? If yes, this could present a problem in completing the ETE study within the 365-day timeframe after the release of decennial Census data.

Also, some OROs identify TCPs specific to the reentry phase of emergency planning or TCPs that are sometimes referred to as "Lockdown TCPs" or "Security TCPs" where they are trying to limit anyone crossing into the EPZ (or a specific ERPA) when it is empty to avoid looting and other crimes. These TCPs are typically manned later when National Guard or other resources/personnel may become available. It is okay to leave these TCPs in a TMP, but they should be clearly explained in the emergency plan as TCPs that would not need to be manned during an evacuation.