

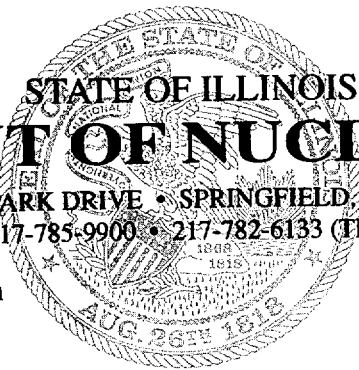
66 FR 22270
5/3/01 (1)

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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George H. Ryan
Governor

Thomas W. Ortziger
Director



May 10, 2001

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

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Rules and Directives
Branch
USNRC

Re: Comments on Draft Addenda to NUREG-0654/FEMA-REP-1, Rev. 1

Dear Sir:

The Illinois Department of Nuclear Safety welcomes the opportunity to comment on the Commission's proposed Draft Addenda to NUREG-0654/FEMA-REP-1, Rev. 1 as noticed in the Federal Register, May 3, 2001.

With the exception of the items noted herein, the proposed citation revisions appear to be appropriate in the context in which they are offered, i.e., that they do not represent a departure from the basic emergency planning requirements embodied in the existing regulations. However, we suggest the Commission consider the following additional clarifications.

1. It is suggested that the proposed addenda contain an "Introductory Statement" to the effect that notwithstanding the citations listed, application of the criteria in NUREG-0654 is assumed to reflect adherence to the current rules, regulations and guidance formally adopted by those federal agencies with jurisdiction over the applicable criteria. In this way, future revisions to NRC, EPA, FDA and other applicable guidance documents would be incorporated automatically by reference once they were formally promulgated.
2. One other citation should be revised. The footnote on Page 69 of NUREG-0654/FEMA-REP-1, Rev. 1, references 1974 and 1979 Public Health guidelines

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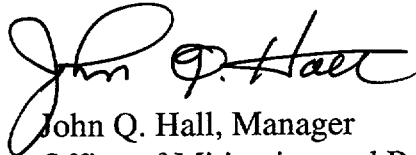
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Add = K. Gibson (KH9)
A. BERANEK (AFB)

that have been superceded, if not by changes in federal regulations then certainly by changes in state statutes and accepted practice regarding emergency medical services delivery. The footnote should be revised via the Addenda to indicate that emergency medical services delivery systems relied upon under REP plans should be consistent with current state and federal requirements, as well as consistent with overall emergency response plans. This would not alter the requirements of NUREG-0654 Criterion L.3, but would ensure that states and licensees comply with current protocols in addressing the planning requirement. The primary concern is that state and local government response procedures utilizing emergency medical service providers must adhere to statutory and regulatory requirements governing the utilization of hospital and ambulance services.

3. Item 3: FEMA-REP-5, Rev. 2 was approved and issued as final in November 2000.
4. Items 4, 15, 16, 19, and 20: A redraft of the EPA PAG Manual was circulated for review and comment in September, 2000, and adoption of a revised version is pending.

Thank you for your consideration. If you have questions regarding these comments, please feel free to call me at (217) 785-9890 or Mike Sinclair, Chief, Division of Planning and Preparedness, at (217) 524-0888.

Sincerely,

A handwritten signature in black ink, appearing to read "John Q. Hall". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Hall".

John Q. Hall, Manager
Office of Mitigation and Response

JQH:as