

# PUBLIC SUBMISSION

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229

**Docket:** NRC-2012-0046

Petition for Rulemaking Submitted by Nuclear Information and Resource Service and Multiple  
Co-Petitioners - Expansion of Emergency Planning Zone

**Comment On:** NRC-2012-0046-0003

Emergency Planning Zone; Notice of Receipt and Request for Comment

**Document:** NRC-2012-0046-DRAFT-0175

Comment on FR Doc # 2012-10314

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## Submitter Information

**Name:** Kimberly Prosser

**Address:**

Brevard County Office of Emergency Management  
Rockledge, FL, 32955

**Submitter's Representative:** Debbie Coles

**Organization:** Brevard County Office of Emergency Management

**Government Agency Type:** Local

**Government Agency:** Brevard County Board of County Commissioners/ Local Government

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## General Comment

See attached letter.

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## Attachments

BCOEM comment to Docket ID NRC-2012-0046

Template=SECY-067

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July 16, 2012

Ms. Cindy Bladey  
Chief, Rules Announcement and Directives Branch  
Division of Administrative Services  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: Docket ID NRC-2012-0046 - Petition for Rulemaking 50-104

Dear Ms. Bladey,

Brevard County Office of Emergency Management appreciates the opportunity to provide comments on the above referenced petition as noticed in the Federal Register on April 30, 2012. The petition was filed with NRC by Mr. Michael Mariotte and was dated February 15, 2012. The petition was filed on behalf of the Nuclear Information and Resource Service (NIRS) and 37 co-petitioners. In summary, the petitioner requests the NRC amend its regulations to expand the Emergency Planning Zones (EPZs) for nuclear power plants in the United States.

Brevard County is part of the St. Lucie Nuclear Power Plant Taskforce and is a host to evacuees should the situation arise. This Office supports the opinions on this petition by the Nuclear Energy Institute and the State of Florida. Further, this Office recommends that the NRC deny the petition because the petitioner failed to provide adequate justification to support a modification to the current rule.

Brevard County takes the "All-Hazards" approach to emergency management and follows the principles of the National Response Framework, National Incident Management System (NIMS), and Incident Command System (ICS). The "All Hazards" approach allows for ease of scalability, thereby allowing response activities to quickly expand or contract based upon the circumstances. The development and implementation of the NIMS/ICS under the National Response Framework has enhanced response capabilities and provides for prompt and effective protective measures for all populations that may be affected.

In conclusion, recent Department of Homeland Security policies and initiatives have provided a solid basis for implementing the ad hoc expansion of Protective Actions for Nuclear Power Plant Emergencies as described in the planning basis, NUREG-0396. Based upon implemented changes from the Post 9-11 and Post Katrina initiatives, the Radiological Emergency Preparedness community in Florida exceeds the necessary resources and protocols to expand Protective Actions beyond the current EPZs in order to reduce public health risks from radiation exposure. Therefore, the consideration of expanding the EPZ is in my professional opinion not required.

Sincerely,

Kimberly L. Prosser, Director  
Brevard County Office of Emergency Management

## Rulemaking Comments

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**From:** Gallagher, Carol  
**Sent:** Monday, July 16, 2012 4:24 PM  
**To:** Rulemaking Comments  
**Subject:** Comment on PRM-50-104  
**Attachments:** NRC-2012-0046-DRAFT-0175.pdf

Van,

Attached for docketing is a comment from Kimberly L. Prosser, Brevard County, on the above noted PRM that I received via the regulations.gov website on July 16, 2012.

Thanks,  
Carol