

PRM-50-104  
(77FR25375)

## PUBLIC SUBMISSION

As of: July 17, 2012  
Received: July 16, 2012  
Status: Pending\_Post  
Tracking No. 8109c9a7  
Comments Due: July 16, 2012  
Submission Type: Web

275

**Docket:** NRC-2012-0046

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

DOCKETED  
USNRC

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

Emergency Planning Zone; Notice of Receipt and Request for Comment

July 17, 2012 (1:35 pm)

**Document:** NRC-2012-0046-DRAFT-0179

Comment on FR Doc # 2012-10314

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

---

### Submitter Information

**Name:** Jacqueline Vaughan

**Address:**

175 Main Street

Prince Frederick, MD, 20678

**Organization:** Public Safety

**Government Agency Type:** Local

**Government Agency:** Calvert County Government

---

### General Comment

See attached file(s)

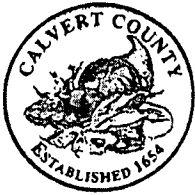
---

### Attachments

SKMBT.NRCletter

Template = SECY-067

DS10



**CALVERT COUNTY  
DEPARTMENT OF PUBLIC SAFETY**

Courthouse, 175 Main Street  
Prince Frederick, Maryland 20678  
410-535-1600 / 301-855-1243 • Ext. 2303  
Fax: 443-486-4074

*Board of Commissioners*  
Gerald W. Clark  
Pat Nutter  
Susan Shaw  
Evan K. Slaughenhaupt Jr.  
Steven R. Weems

Jacqueline K. Vaughan, Director

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

July 16, 2012

ATTN: Rulemakings and Adjudications Staff:

**REFERENCE:**

U.S. Nuclear Regulatory Commission: Notice of Public Comment on Petition for Rulemaking (PRM), dated February 15, 2012; In Response to Petitioner's Request that NRC amend its regulations to expand the Emergency Planning Zones (EPZs) for nuclear power plants.

**CITATIONS:**

Document Citation: 77 FR 25375

Docket Number: NRC-2012-0046

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

Gentlemen and Ladies:

Calvert County Government hereby wishes to comment on the referenced petition and the prospective rule change. We have reviewed the petitioner's request and believe that the request is unjustified and would cause a significant fiscal burden to the county. In addition, extending the respective emergency planning zones for the nation's commercial nuclear power stations should be reserved until after additional reviews are completed and scientific analysis has been fully examined and satisfied by the U.S. Nuclear Regulatory Commission, other supporting federal agencies, and any credible third party interests.

The proposed rule change would cause undue hardship on Calvert County Government, and most importantly the residents of Calvert County. Calvert County is the smallest county in the state of Maryland (geographically) with a population of approximately 98,000 citizens; the proposed 25 mile EPZ encompasses all of Calvert County.

The expansion of the 10 mile EPZ to a 25 mile EPZ would mean Calvert County, at a minimum, would have to address the following issues:

1. Our operations/EOC would need to be relocated outside of the county.
2. Calvert County would no longer have the ability to provide a mass-care/reception center within its geographical boundaries.
3. The current evacuation routes and Estimated Time of Evacuation (ETE) would require changes to accommodate the increase in population.

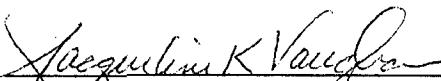
4. Additional staffing would be required to operate traffic and access control points.
5. Additional staffing would be required at the mass-care/reception center.
6. The current Siren system utilized by Calvert Cliffs Nuclear Power Plant would have to be expanded to cover the areas of Calvert County that will be added to the EPZ.
7. The emergency worker monitoring and decontamination site would have to be relocated outside of the county.
8. Planning and guidance documents would all require modifications to comply with the proposed rule change.
9. Because the 25 mile EPZ would encompass the entire county, some governmental offices and support agencies would have to relocate outside of the county. This includes the accident assessment center operated at the CENG Joint Information Center and Emergency Operations Facility in Prince Frederick, MD.

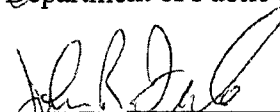
The information listed above is just a brief overview of the potential hardships we would face if the proposed rule change were accepted by the NRC. The fiscal impact on Calvert County Government and the citizens it serves would be catastrophic. Calvert County does not have the financial means, staffing or resources to support this proposed rule change.

To date, Calvert County has experienced over 30 years of safe and successful nuclear power generation at Calvert Cliffs Nuclear Power Plant (CCNPP), which is operated by Constellation Energy Nuclear Group (CENG) in Lusby, MD. It should be noted that this was also the first commercial fixed nuclear facility in the nation to have its license renewed by the NRC.

While that history is commendable, we appreciate the public's concern and perception regarding life safety issues and will take all practical steps to ensure that appropriate systems are put in place and implemented to enhance the safety of the public on behalf of the citizens of Calvert County, MD. In that regard, the agencies of Calvert County Government will continue to support the utility and, moreover, undertake any efforts to improve the safety and wellbeing of individuals who might be at risk of a radiological emergency at the Calvert Cliffs Nuclear Power Plant.

Sincerely,

  
Jacqueline K. Vaughan, Director  
Department of Public Safety

  
John R. Fenwick, Division Chief  
Division of Emergency Management and Safety

## Rulemaking Comments

---

**From:** Gallagher, Carol  
**Sent:** Tuesday, July 17, 2012 8:47 AM  
**To:** Rulemaking Comments  
**Subject:** Comment on PRM-50-104  
**Attachments:** NRC-2012-0046-DRAFT-0179.pdf

Van,

Attached for docketing is a comment from Jacqueline Vaughan, Calvert County Department of Public Safety, on the above noted PRM that I received via the regulations.gov website of July 16, 2012.

Thanks,  
Carol