

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

April 12, 1990
LIC-90-0201

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Reference: Docket No. 50-285

Gentlemen:

SUBJECT: Notification and Protective Action Recommendation (PAR) Process

Omaha Public Power District (OPPD) has received a request from The Nebraska State Civil Defense Agency to change the Notification and Protective Action Recommendation (PAR) process as contained in the Fort Calhoun Station Emergency Response Plan. Currently, OPPD would notify the State at all Emergency Action Levels and would also notify local county officials at Site Area and/or General Emergency. This is done to ensure prompt response and address NUREG-0654, Rev. 1, Section J.7, which states:

"...prompt notification shall be made directly to the offsite authorities responsible for implementing protective measures within the plume exposure pathway Emergency Planning Zone."

In Nebraska, the State Health Department officials are responsible by Statute for assessing the radiological health hazards and making appropriate recommendations to the Governor or Governor's Authorized Representative. Once approved, these recommendations are forwarded to the local officials who are responsible for implementing these recommendations.

The Nebraska Civil Defense Agency's concern with the current process is that confusion may result if the local officials receive both the State and OPPD's PARs. They have, therefore, requested that OPPD make notification and PARs only to the State and not directly to local officials unless there has been insufficient time for the State to staff their Forward Operating Location at the Emergency Operations Facility (EOF). In that situation, the Nebraska Civil Defense Agency has requested that notification and Protective Action Recommendations be made directly to local County officials.

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OPPD has considered the concern expressed by the State of Nebraska on this issue. OPPD, however, expects to continue with the current notification process unless additional guidance or interpretation is provided by the NRC.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/pjc

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