

1/15/83

Honorable Nunzio J. Palladino
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

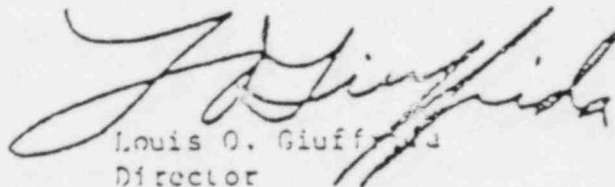
Dear Mr. Chairman:

This letter is in response to your recent letter requesting clarification of an issue related to the Federal Emergency Management Agency's (FEMA) review of offsite emergency planning around the Indian Point facility in New York. Specifically, you requested clarification of whether or not, in principle, a State can substitute for a county that does not have its own emergency plan.

A State can choose to offset or substitute compensatory planning measures in lieu of a local level emergency plan provided that they are developed for a specific local jurisdiction and are not generic in nature. However, without prejudging any specific situation, it can be said that the planning and preparedness standards contained in "NUREG-0654-FEMA-REP-1, Rev. 1," would place a very heavy resource burden on any State choosing to meet offsite safety requirements in this way. Of the 169 evaluation criteria applicable to State and local governments defined in "NUREG-0654-FEMA-REP-1, Rev. 1," 96 relate to local governments. Furthermore, a State compensatory plan contradicts the interdependent framework between State and local governments upon which these joint FEMA/Nuclear Regulatory Commission criteria are based. FEMA views this interdependence as critical to establishing adequate offsite emergency planning and preparedness capability. Nevertheless, FEMA will evaluate State compensatory measures on their merits, but they will not be encouraged as an alternative to the planning approach embodied in "NUREG-0654-FEMA-REP-1, Rev. 1."

Please feel free to contact me should you wish to pursue this matter further.

Sincerely,


Louis O. Giuffrida
Director

State Agency personnel that will be assigned to Rockland County SOC to implement the County Plan if the County does not implement, or all part of, it on its own.

Office of Disaster Preparedness:

Joseph Paolone	(O) 914-454-0430	(H)	-
Barbara Porter	(O) 914-454-0430	(H)	-

Department of Health -

Health and General Sanitation/Direction & Control

Alternate:	Gerald Liebler	(O) 914-794-2045	(H)	-
	S. Lawrence Baldwin	(O) 607-432-3911	(H)	-
	John Cunnah	(O) 518-882-1414	(H)	-
	James Decker	(O) 518-457-7150	(H)	-

Emergency Medical Services

Alternate:	John Claire	(O) 518-457-7150	(H)	-
	Charles Decker	(O) 518-457-7150	(H)	-
	George Johnson	(O) 518-474-3171	(H)	-
	Kevin Kraus	(O) 518-474-3171	(H)	-

Radiological Assessment

Alternate:	Robert Middleton	(O) 518-474-7150	(H)	-
	George Kerr	(O) 518-473-3613	(H)	-

Department of Transportation:

A. Carto	(O) 914-634-4661	(H)	-
T. Malone	(O) 914-634-4661	(H)	-

Office of Fire Prevention and Control:

William Leavy	(O) 518-474-6746	(H)	-
Philip R. Lomax	(O) 518-474-6746	(H)	-
Edward Nicolls	(O) 518-474-6746	(H)	-

Division of State Police:

T/Sgt. J. S. Hunt, Jr.	(O) 914-353-1100	(H)	-
T/Sgt. W. H. Bower	(O) 914-353-1100	(H)	-

Department of Social Services:

Carmen Alustiza	(O) 914-638-0560	(H)	-
John McKeon	(O) 914-638-0560	(H)	-