



DOCKET NUMBER

PETITION RULE

PRM 50-39

(50 FR 20799)

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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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July 23, 1985

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHSecretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Re: Southern California Edison Company. Filing of Petition for Rulemaking.
Docket No. PRM-50-39 (50 Fed. Reg. 20799-20800; May 20, 1985)

The Illinois Department of Nuclear Safety hereby submits its comments on the above-identified proposed amendment to 10 CFR Part 50. The proposed change would eliminate as a possible interpretation of the current wording that persons only irradiated, and not otherwise injured, require emergency medical treatment following a nuclear power plant accident.

The Illinois Department of Nuclear Safety supports the intent of the proposed amendment. The Department agrees that persons who are only irradiated do not benefit from emergency medical treatment. Medical care for severely irradiated persons is no more effective if provided quickly, than if provided many hours after the exposure to radiation. Therefore, in the event of an accident at a nuclear power plant involving persons who are only irradiated and persons who are both radioactively contaminated and physically injured, the latter category of persons should have first access to medical facilities. Prearranged medical facilities should be designated for treating these contaminated/trauma patients.

Severely irradiated persons, however, must also receive specialized medical care, even though immediate emergency care is not essential for life saving. This care can be arranged depending on the availability of resources (e.g., emergency vehicles, medical personnel, hospital work loads, etc.). The Department suggests modification of the petition's proposed amendment in order to assure that irradiated persons receive proper care.

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Acknowledged by CERD...

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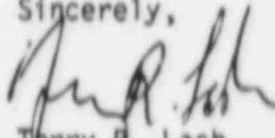
The Department's proposed wording is as follows:

(b) * * *

- (12) (a) Arrangements are made for emergency medical services for persons who are both (i) contaminated with radioactive material and (ii) physically injured such that immediate treatment in a medical facility is required.
- (b) Arrangements are provided for timely treatment of severely irradiated persons consistent with the constraints of available resources in treating radioactively contaminated and physically injured persons.

If you have any questions about the Department's comments, do not hesitate to contact Mr. Frank Sprague.

Sincerely,



Terry R. Lash
Director

TRL:dmm