

CALLAWAY COUNTY-FULTON
EMERGENCY MANAGEMENT AGENCY
Route #1
Kingdom City, Missouri 65262

13 May 1981

SUBJECT: Clarification of Document symbols and terminology

TO: NRC/FEMA Steering Committee
Nuclear Regulatory Commission
Washington, D.C. 20555

INFO: Mr. James P. Gleason, Esquire; Chairman
Atomic Safety and Licensing Board
513 Gilmore Drive
Silver Spring, MD. 20901

Gentlemen:

Reference NUREG 0654 FEMA-REP-1, Rev. 1, dated November 1980; Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

In discussions with planning personnel at State and Utility levels, a conflict in definition of wording and symbols has arisen. Your clear response to the following questions will resolve this matter.

Example: (H. Emergency Facilities and Equipment - pg 55)

<u>Evaluation Criteria</u>	<u>Applicability and Cross Reference to Plans</u>		
	<u>Licensee</u>	<u>State</u>	<u>Local</u>
12. Each organization shall establish a central point (preferably associated with the licensee's near-site Emergency Operations Facility), for the receipt and analysis of all field monitoring data and coordination of sample media.	<u>X</u>	<u>X</u>	<u>X</u>
Question 1: Does "Each organization" indicate a mandatory requirement for an action to be performed by the organization indicated by the letter "X"?			
Question 2: Does the letter "X" fulfill the requirement of "guidance" as used in APPENDIX 5, <u>GLOSSARY</u> , final paragraph, page 5-2? "Where the <u>guidance</u> in this document indicates a function that must be performed, emergency planners at all levels, must decide and agree among themselves, which organization is to perform such function. As a minimum, one lead agency at the State level and one lead local government agency having 24 hour manning is required."			

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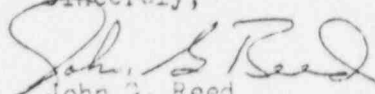
Question 3: Does the "minimum requirement" in the last sentence of the above quoted text place a requirement for duplicate effort or capabilities at State and Local governmental levels as assurance that the public health and safety will be adequately provided for in the event either State or Local government fails to function as planned?

I contend that local government is the first line of defense in any protective action taken which provides for public health and safety. To accept a "lame duck" role in emergency radiological response plans is to abrogate legal responsibility as provided in law for local elected officials. As I interpret NUREG 0654; each "X" places a formal requirement for action by the entity designated (Licensee, State & Local). Where two or more entities are designated, a multiple capability must exist and compliance is a cooperative effort guaranteeing public protection. Only the lead role for the activity need be determined by those concerned.

Unless the emergency response capability at the local level of government is viewed as a full partnership with the State and Licensee, it should be eliminated as a requirement for local governments and the responsibility placed directly upon the Governor's Office of each state involved. If it is to be a "full partnership", it must have an independent capability to verify information received and act in the absence of outside assistance should a situation ever arise wherein public health and safety is imperiled.

Your timely response to this communication will greatly assist in the review of Licensee and State interim plans which are currently being conducted by this office.

Sincerely;


John G. Reed
Director

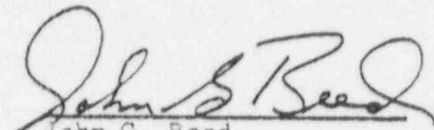
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
UNION ELECTRIC COMPANY)	Docket No STN 50-483
)	
(Callaway Plant, Unit 1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing
Addition of Document to Mr. Reed's Further
Particularization of Reed's Contention 1 and Contention 3
were served this 12 day of June, 1981 by
deposit in the U.S. mail, first class postage
prepaid, to the parties named on the attached
Service List.


John G. Reed
Citizen of the United States
of America

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NUCLEAR REGULATORY COMMISSION

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UNION ELECTRIC COMPANY

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Docket No STN 50-483

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