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October 3, 1996

61FR 43794

Aug. 26, 1996

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Secretary:

In July 1996, the Nuclear Regulatory Commission and the Federal Emergency Management Agency published a draft NUREG-0654/FEMA-REP-1, Revision 1, Supp. 3 for interim use and comment.

The Commonwealth of Pennsylvania provides comment for your use in finalizing the document.

First, the Commission and Agency are commended for clarifying and updating the regulatory guidance. However, NUREG-0654 needs to be updated, even replaced with a new document. This is the third supplement to Revision 1 of 0654. That alone would mitigate for publishing a new document. In addition, most of the technical bases for 0654 have been superseded - changes in EBS/EAS, NUREG 0696, EPA 520/1-75-001 to EPA400 are significant; items like Annex 1 to Appendix 2 to 0654 are completed; and technology in meteorology, evacuation estimation, public alert and notification and plant notification systems, let alone communications and computer technology, require a total revision of 0654.

In the interim, Supp. 3 should be strengthened. If, as it is clear, the NRC and FEMA believe that evacuation is the preferred protective response, Supp. 3 should so state and the previous guidance should be superseded and not allowed as a continuing protective response method. 0654 is guidance, and NRC and FEMA should provide the best guidance possible. If there are choices that are equal then that should be the guidance.

In addition to providing the guidance regarding the two mile 360 degree, five mile down wind evacuation, it is essential that the plume exposure approximate ten mile Emergency Planning Zone (EPZ) be specifically addressed not just in the terms "assess need to extend distances". It appears from the Response Technical Manual series and NUREG-1150 that the guidance should be to evacuate the entire plume exposure approximate ten mile EPZ.

The shifting of the wind which would necessitate additional sector or area evacuations, possibly while the original evacuation is in process, could cause significant mutual interference and delays for the evacuees in each group. In addition, any evacuation can not be limited to the sector or

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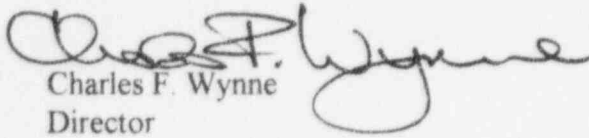
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area or distance intended by the decision makers. There will be spontaneous evacuations. All concerned should recognize the fact and deal in the planning and exercise process within the entire plume exposure approximate ten mile EPZ.

Specific comments are enclosed.

Sincerely,


Charles F. Wynne
Director

CFW/ARS/cs

Enclosure

cc: Rules Docket Clerk, FEMA
Directors of States with Nuclear Power Plants
FEMA Region III, Attn: RAC
NRC Region I, Attn: State Liaison
Director, Bureau of Radiation Protection

SPECIFIC COMMENTS

- Page 1-3 Heading - There has been no change, therefore, side line is not appropriate.
- Page 1-16 State and/or Local Offsite Authority Actions para. 3 - Revise text as per page 1-17a. below.
- Add a parenthetical, see Figure 1, at end of para. 3.
- Page 1-17 1. Change note a. to read:
- a. For sequences with actual or projected severe core damage or loss of control of facility, recommend evacuation of the approximate 10 mile EPZ in all directions, unless conditions make evacuation dangerous, and assess need to extend distances. Advise-continued listening to Emergency Alert System (EAS) messages.
2. Change note b. to indicate what is meant by "high levels of contamination" perhaps by reference to EPA 400.
- Page 1-18 Note after 5e has been eliminated without comment. Rationale should be provided.
- Page 1-19 1. Chart should be retitled.
- For example. Figure 1 - Simplified Guidance Flow Chart for Public Protective Actions For Severe Core Damage or Loss of Control of Facility
2. Change first block to read:
- Evacuate the entire approximate 10 mile EPZ unless conditions make evacuation dangerous and advise continued monitoring of EAS broadcasts.
3. In addition, if the original guidance remains in effect, and it should not, a flow chart, Figure 1, should be added to the final Supp. 3.