

HUNTSVILLE - MADISON COUNTY
EMERGENCY MANAGEMENT AGENCY



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#6
Frank Kantor
61 FR 43794

October 30, 1996

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6D59
Washington, D.C. 20555-0001

Dear Sir:

After review of the *Draft Supplement 3 to NUREG-0654/FEMA-REP-1, Revision 1* we recommend its adoption with one modification. Section III., Continued Use of Earlier Guidance on Protective Actions for Severe Reactor Accidents, provides for the use of either the old or the new criteria. The first sentence in the second paragraph to Section I. A., Introduction, Purpose and Use of Document, creates ambiguity in that it seemingly would allow licensees, state and all local emergency response organizations around the same nuclear power plant to selectively use both criteria at the same time, some using the old and others the new. We recommend that Section I. carry the proviso that the licensees, state and all local emergency response organizations must all agree on and use one criteria or the other.

We look forward to continuing a strong, responsive program, with well-defined goals and means to achieve those goals. Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Brett A. Garrison".

Brett A. Garrison
Director

cc: Lee Helms, AEMA
Sam Guerrero, AEMA

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