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F. Kantor
Contact

61 FR 43794
October 19, 1996

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RULES REVIEW
USNRC

To: Chief, Rules Review and Directive Branch, U.S. Nuclear Regulatory Commission

From: The Citizens Regulatory Commission Subcommittee on Evacuation Plans and Procedures

Subject: Criteria for Preparation and Evacuation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, NUREG-rep-1 Rev.1 Supp. 3

This letter is written in response to request for comments to the subject document. The difficulty in obtaining this document is our first concern. It was not available at the local public reading room as all Nuclear Regulatory documents are supposed to be according to the availability notice contained in the subject document. We needed to contact the White House to obtain this evacuation plan document.

General Comments and Questions

1. What organizations have review responsibility regarding this document? Please define "emergency response organization", a term used throughout the subject document.
2. Throughout the subject document it is stated that "not all emergency response organizations fully understand the impact of these insights on protective action decision making". What is being done to insure that these organizations understand the full importance of this document? What training is being provided to properly implement its guidance.
3. What is being done to ensure that the licensee initiates the proper action in a timely manner in an event scenario?
4. Please explain the criteria for establishing the 2 mile general and the 5 mile downwind evacuation areas. Where do these numbers come from?
5. An explanation of all acronyms used should be included in this document.

We strongly urge that a public meeting be held where all responsible organizations such as the NRC, NU, local and state officials, and "emergency response organizations" review and explain the evacuation plan to the citizenry. At this meeting, please make available the studies that necessitated the changes to the present evacuation guidelines.

Specific Comments and Questions

1. Title page- The title is wordy and obscure and does not facilitate understanding of its contents.
2. Abstract - Please define "projected core damage".
3. Page 1- Why are Nuclear Power Agencies and State and local emergency response organizations allowed to choose between the guidance provided in this document and previous outdated guidelines? We suggest that the NRC require that current proposed guidelines be mandated and not presented as an option.

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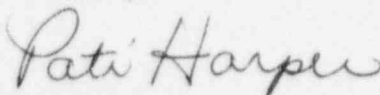
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4. Page 2- Please define the term "shelter". Where are they located? What are they equipped with? Are they accessible to the disabled?
5. Page 3 - Who is responsible for transporting "transit dependent persons"? Define "transit dependent persons". For example, does the "term transit dependent person " include those without the use of a working moter vehicle ?
6. Page 4- What study suggests that it is safer to stay in an area after a radiological release than to drive in hazardous weather?
7. Page 1-3- The word required should be substituted for "intended "in the last paragraph. The word "about" should be deleted from the same paragraph. There should be no doubt about the action required.
8. Page 1-17 - What does "45 to 90 degree sector " refer to? When effluent monitors detect levels that indicate an emergency situation exists, will potassium iodine be available to utility workers and the general public?

Sincerely,

A handwritten signature in cursive script that reads "Pati Harper".

Pati Harper, Chairperson, CRC Evacuation Committee
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