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F. Kantor

State of Wisconsin \

November 12, 1996

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

DEPARTMENT OF MILITARY AFFAIRS
Wisconsin Emergency Management

61FR 43794
Aug. 26, 1996

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2400 WRIGHT STREET
P.O. BOX 7865
MADISON, WISCONSIN 53707-7865
TELEPHONE: (608) 242-3232
FACSIMILE: (608) 242-3247
24-HOUR EMERGENCY HOTLINE:
1-800-943-0003

Dear Secretary:

This letter is in response to the July 1996 publication of a draft NUREG-0654/FEMA-REP-1, Revision 1, Supplement 3 for interim use and comment.

The Commission and FEMA are commended for clarifying and updating this regulatory guidance. However Wisconsin has indicated in their response to FEMA's request for comments regarding their strategic review of their program that the MOU and NUREG guidance should be reviewed, and updated or replaced with a more current document that reflects changes in the entire program nationwide. This is the third supplement to Revision 1 of 0654. That fact alone would speak for publishing a new document. In addition there have been several technical bases for 0654 that have been superseded, items regarding technological issues have been completed, communication systems have been modernized and many state and local agencies are implementing the use of computers in various functions.

Therefore, we suggest that NRC and FEMA review their MOU and 0654 in conjunction with FEMA's strategic review. Both agencies need to look at and update their guidance to reflect the major changes and improvements of both onsite and offsite organizations.

Wisconsin has already changed their PAR decision making process to reflect supplement 3 recommendations. However, we have reserved the responsibility to review the PAR prior to issuing and implementing it.

We appreciate the opportunity to comment on this important interim guidance and again urge NRC and FEMA to coordinate efforts to review and issue more updated guidance.

Sincerely,

Steven D. Sell

Steven D. Sell
Administrator

pc: Vern Wingert, FEMA, Headquarters
Christine C. Bacon, Director BTH

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