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PETITION FILE

PRM

50-39

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(50 FR 20799)

PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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DOCKETED
USNRC

JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

August 12, 1985

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PGandE Letter No.: DCL-85-266

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

ATTN: Docketing and Service Branch

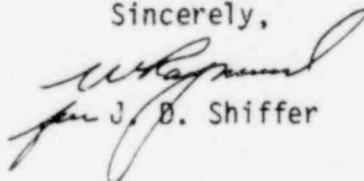
Re: Proposed Rules: Emergency Planning
Amendment Concerning Medical Emergency Preparedness
Federal Register, Volume 50, No. 97
Pages 20799 - 20800, May 20, 1985

Gentlemen:

Pacific Gas and Electric Company (PGandE) has reviewed the proposed rule concerning medical emergency preparedness. PGandE's comments in support of this proposed rulemaking are enclosed.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,



J. D. Shiffer

Enclosure

cc: J. B. Martin

8508210206 850612
PDR PRM
50-39 PDR

D211
add John Philips, 4000 MMBB
add Podoluk, ENW 359

Acknowledged by card..... AUG 20 1985

ENCLOSURE

PACIFIC GAS AND ELECTRIC COMPANY'S COMMENTS ON THE
PROPOSED RULEMAKING CONCERNING MEDICAL EMERGENCY PREPAREDNESS
Docket No. PRM-50-39
(Docketed: April 3, 1985)

PGandE supports the proposed rulemaking filed by Southern California Edison. The rulemaking would amend emergency planning regulations to clarify that onsite and offsite emergency response plans need only include arrangements for medical treatment of persons who are both contaminated with radioactive material and physically injured in some other manner which requires emergency medical treatment.

In support of this proposed rulemaking, PGandE submits the following for NRC's consideration:

1. The proposed rulemaking does ensure that there is an adequate level of emergency preparedness for those individuals who are both contaminated with radioactive material and physically injured such that emergency medical treatment is required.
2. The proposed rulemaking does not require prearranged medical treatment for people who have been irradiated but have not suffered other physical injuries. Individuals who have been irradiated do not require immediate medical attention. There is ample time following radiation exposure to arrange treatment of individuals at local or regional medical facilities.

PGandE agrees that the proposed rulemaking would clarify the U.S. Court of Appeal's decision in *GUARD v. Nuclear Regulatory Commission*, 753 F.2d 1144, 1150 (D.C. Cir. 1985), and ensure adequate planning standards for medical emergency preparedness.