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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '85 DEC 23 P2:34

In the Matter of)
COMMONWEALTH EDISON COMPANY)
(Braidwood Station, Units 1 and 2)

Office of Secretary
DOCKETING & SERVICE
BRANCH
Docket Nos. 50-456
50-457 /OL

NRC STAFF AND FEMA RESPONSE TO LICENSING
BOARD'S OCTOBER 19, 1985 ORDER REQUESTING
INTERPRETATION OF "RESPIRATORY PROTECTION AS
USED IN NUREG-0654/FEMA-REP-1, REV. 1 SECTION G.1.c.

In the October 29, 1985 hearing on Rorem Contention 1(A), the Licensing Board ordered FEMA and the NRC Staff to provide an "official agency position . . . with regard to what respiratory protection [as used in NUREG-0654/FEMA-REP-1, Rev. 1 Section G.1.c.] means." Tr. 545-456. Staff submits the following documents and information on FEMA's and its own behalf:

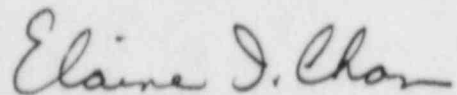
- (1) FEMA Policy Statement on Respiratory Protection
November 15, 1985
- (2) Affidavit and Professional qualifications of
Edward M. Podolak, Jr., Senior Emergency
Preparedness Specialist, Emergency Prepared-
ness and Engineering Response, Office of
Inspection and Enforcement, USNRC which states
that FEMA's Policy Statement on Respiratory

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Protection is consistent with NRC policy and
guidance as expressed in NUREG-0654/FEMA-R&P-1,
Rev. 1.

Respectfully submitted,

A handwritten signature in cursive script, reading "Elaine I. Chan".

Elaine I. Chan

Counsel for NRC Staff

Dated at Bethesda, Maryland
this 19th day of December, 1985



Federal Emergency Management Agency

Washington, D.C. 20472

November 15, 1985

POLICY STATEMENT ON RESPIRATORY PROTECTION

The Federal Emergency Management Agency (FEMA) has been ordered by the Braidwood Station Atomic Safety and Licensing Board (ASLB) to file a written explanation on how the Agency interprets the phrase, "respiratory protection," as used in NUREG-0654/FEMA-REP-1, Rev. 1, section G.1.c. This policy statement contains FEMA's explanation of respiratory protection as used in this section.

Background

The use of "respiratory protection" in G.1.c. is addressed within the context of disseminating information to the public on protective measures to be used during a radiological emergency. Information on protective measures is provided to the public through various means such as prepared materials and public meetings. The focus of the ASLB's discussion on respiratory protection is on the content of Commonwealth Edison's emergency information brochure for Braidwood. The specific issue raised is whether or not the brochure should contain an explicit reference to respiratory protection since it does not at the present time.

Issue Definition

FEMA's answer to the Braidwood ASLB is provided through answers to these questions:

- o In NUREG-0654/FEMA-REP-1, Rev. 1, is respiratory protection equated with sheltering and evacuation?
- o What is the context of G.1.c. for providing public information on respiratory protection?
- o Is the language in G.1.c. a recommendation or a mandate that respiratory protection be included in brochures?

Since the concerns raised by the ASLB are limited to providing information to the public, the policy provided in this statement does not pertain to the use of respiratory protection by emergency workers.

Interpretation of Language in G.1.c. on Respiratory Protection

As stated, FEMA's policy on respiratory protection is provided below through answers to the posed questions.

1. In NUREG-0654/FEMA-REP-1, is respiratory protection equated with sheltering and evacuation?

Logically, both evacuation and particularly sheltering offer some degree of respiratory protection. Further, respiratory protection is closely related to sheltering and evacuation in that it may supplement either of these latter two

actions by serving a common function to all protective measures in preventing or minimizing the inhalation of certain types of airborne radioactive materials. It is noteworthy, however, that both evacuation and sheltering offer protection on a much broader range.

In a specific sense, respiratory protection is a type of protective measure distinct from either sheltering or evacuation. This is reflected in how the phrase is used in G.l.c. and E.7. In G.l.c., respiratory protection is listed as one of four distinct types of protective measures, i.e., evacuation, sheltering, radioprotective drugs and respiratory protection. In E.7., an example (handkerchief over mouth) is provided.

Reference is also made at the end of evaluation criterion E.7. to guidance on respiratory protection published by the American Industrial Hygiene Association (AIHA). An examination of the AIHA guidance shows that respiratory protection is discussed through the use of common household and personal items (e.g., handkerchiefs and towels) to reduce the inhalation of airborne toxic materials including radioactive materials.

2. What is the context of G.l.c. for providing public information on respiratory protection?

There are two contexts in NUREG-0654/FEMA-REP-1, Rev. 1 in which the provision of information to the public on respiratory protection is addressed. In G.l.c., the context is the annual dissemination of information to the public such as information commonly provided through brochures. In E.7., the context is the provision of information during an emergency through the Emergency Broadcast System (EBS). Thus, it is clear that in G.l.c. the context for providing public information is the repetitive distribution of prepared materials on at least an annual basis as distinct from the content of EBS messages provided at the time of an actual radiological emergency. While the specific type and form of disseminated materials is not specified in G.l.c., the most common method for accomplishing such a dissemination is through emergency information brochures that are developed through a coordinated effort by licensees and State and local governments.

3. Is the language in G.l.c. a recommendation or a mandate that respiratory protection measures be included in brochures?

The intent of the language in G.l.c. is to set forth the types of topic coverage considered essential for incorporation into public information materials. This is expressed in the phrase, "This information shall include" Thus, it is necessary to include information on protective measures in these materials. With respect to addressing specific types of protective measures, the intent of the language in G.l.c. is structured to suggest various protective measures or components of protective measures that may be included in these materials. This is expressed in the abbreviation, "e.g." which means "for example." This intent is further witnessed by the two references ("evacuation routes" and "relocation centers") to components of evacuation. These two references, like the other references within this level of G.l.c., are provided as illustrative topics that may be used in discussing protective measures.

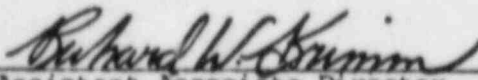
While information on protective measures in general must be included in brochures, it is not required that information specific to a form of respiratory protection be included. However, if the information is included, it must be consistent with the governing emergency plan for the area. Protective actions information included in the brochure, like all the information in the brochure, is required to be a reflection of the public policy for protective actions. A jurisdiction might feel that a particular action is not acceptable. Thus requiring information within the brochure on protective actions not intended for general use within jurisdictions might confuse rather than inform.

Consistent with the above, the inclusion of information on each of the individual types of protective measures is not mandated in G.l.c. Moreover, the absence of language on respiratory protection in brochures will not constitute a basis per se for FEMA to indicate a planning inadequacy. However, FEMA recommends that the brochures reflect language on protective measures contained in the emergency response plan.

Conclusion

While not specifically mandated in NUREG-0654/FEMA-REP-1, Rev. 1, FEMA recommends that language on respiratory protection be incorporated in brochures. As stated, the absence of language on respiratory protection in brochures will not constitute a basis per se for FEMA to indicate a planning inadequacy. We are more concerned, in reviewing brochures, that references to protective measures be couched in a manner that help persons to be prepared to take specific types of protective actions but yet cautions them to listen to EBS messages in order to follow the specific protective actions recommended for the particular accident circumstances.

APPROVED


Assistant Associate Director
Office of Natural and Technological
Hazards Program
State and Local Programs and
Support Directorate