



Federal Emergency Management Agency

Washington, D.C. 20472

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MEMORANDUM FOR: Edward L. Jordan
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission

FROM: *Richard W. Krimm*
Richard W. Krimm
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SUBJECT: Federal Emergency Management Agency (FEMA) Suggested
Language Revisions to Proposed Amendment to 10 CFR
Part 50, Appendix E: Consideration of Earthquakes in the
Context of Emergency Preparedness

We have reviewed the Commission's proposed amendment to CFR Part 50, Appendix E, concerning the need of licensees and State and local governments to consider the impact on emergency planning of earthquakes for accidents at licensed nuclear facilities. FEMA concurs with the position stated in the proposed amendment:

- (e) Offsite emergency response plans, submitted to satisfy the standards set forth in this section, need not consider the impact on emergency planning of earthquakes which cause, or occur proximate in time with, an accidental release of radioactive material from the facility.

We are providing suggested revisions (attachment) for the amendment in two sections that refer to FEMA. They address language on pages four and five of the memorandum from William J. Dircks to the Commissioners.

We appreciate the opportunity to review the proposed amendment.

Attachment
As Stated

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ATTACHMENT

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It should be noted that the Federal Emergency Management Agency (FEMA) reviews offsite radiological emergency planning and preparedness to insure the adequacy of Federal, State, and local capabilities in such areas as emergency organization, alert and notification, communications, measures to protect the public, accident assessment, public education and information, and medical support. Detailed, specific assessment of potential earthquake consequences and response are not part of this process related to radiological emergencies. Also, FEMA has coordinated planning for the Federal response to radiological emergencies including commercial nuclear power plant accidents. These efforts have resulted in FEMA publishing the Federal Radiological Emergency Response Plan in the Federal Register (49 FR 35896) on September 12, 1984. In addition, FEMA has an active program of earthquake preparedness which includes hazards and vulnerability analyses, estimates of damage and casualties, planning for Federal response to a major earthquake, and assistance to State and local governments in their earthquake planning and preparedness activities. FEMA believes that all of these activities are sufficiently flexible to complement each other in preparing for an event that may require a concurrent response to a major earthquake and a serious accident at a nuclear power plant.

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FEMA is directly involved in the evaluation of offsite emergency preparedness and, therefore, would be affected by the promulgation of this proposed rule change. Therefore, the Nuclear Regulatory Commission staff consulted with the FEMA staff during the development of this paper. FEMA concurs in the staff's proposed rule change.