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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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TERRY R. LASH
DIRECTOR

February 26, 1988

December 2, 1987
52 FR 45866
(8)

David Meyer, Chief
Program Procedures Branch
Nuclear Regulatory Commission
Mail Stop - 4000 MNBB
Washington, DC 20555

Dear Mr. Meyer:

RE: NUREG-0654, FEMA-REP-1, Rev. 1, Supplement 1, Criteria for
Preparation and Evaluation of Radiological Emergency Response Plans
and Preparedness in Support of Nuclear Power Plants

The Illinois Department of Nuclear Safety (IDNS) hereby submits its comments concerning NUREG-0654, FEMA-REP-1, Rev. 1, Supplement 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants". IDNS is the lead agency in Illinois for preparing emergency plans for, and in cooperation with the Illinois Emergency Services and Disaster Agency coordinating emergency responses to, accidents at nuclear power plants. After careful review, the consensus of IDNS staff is that the assumptions on which this document is based are incorrect. This lack of an appropriate basis should invalidate the entire document. The assumptions and our objections are examined in detail below.

"In an actual radiological emergency, State and local officials that have declined to participate in emergency planning will:

- a. Exercise their best efforts to protect the health and safety of the public..."

While it is likely that State and local officials will respond to an actual radiological emergency, it is not a certainty. Nor is it the least likely that these "best efforts" would be in any way coordinated or effective.

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"...b. Cooperate with the utility and follow the utility offsite plan..."

There is no guarantee that State or local personnel would follow a utility plan. In fact, it seems far more probable that they would follow their normal procedures for other types of emergencies, as they were applicable to the situation.

"...and c. Have the resources sufficient to implement those portions of the utility offsite plan where State and local response is necessary."

If State and/or local agencies decline to participate, there will be no way of determining whether their resources are sufficient for this purpose. Without proper planning and exercising, there is no identification of what is necessary, let alone sufficient.

"...the utility's offsite response plan and the offsite response organization will provide compensating actions through the use of liaisons to deal with the coordination of information and resources with State and local governments and to provide advice and assistance to responding State and local governments in implementing their assigned roles and functions under the utility's offsite response plan."

In general, utilities have neither the resources nor the legal authority to carry out many of the actions associated with effective response. Additionally, the reliance on liaisons is questionable at best. If State and/or local governments were declining to participate, the utility's credibility would likely be so low that liaisons would either be refused access to local and State facilities, or be ignored.

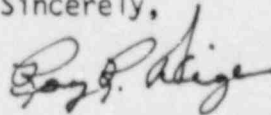
The document, which presents many of the same familiar standards as in the original 0654, depends heavily on this rather elastic definition:

"Offsite Response Organization (ORO): The utility offsite emergency response organization along with other participating voluntary and private organizations, and local, State, and Federal governments engaging in the development of offsite emergency plans and preparedness for a nuclear power plant."

The first problem with this definition is that it assumes some participation by local and State government, which may not be the case. The second problem is the inelasticity of the requirements. Obviously the extent to which the ORO will be able to meet the extensive requirements will depend on the size and composition of the ORO, which is undefined.

In summary, we find this document to be flawed in its basic assumptions and therefore invalid. We request that NRC and FEMA reevaluate these assumptions and issue new guidance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Roy R. Wight", written in a cursive style.

Roy R. Wight, Manager
Office of Nuclear Facility Safety

RRW/kls