

From: HUSSAIN, Saqib [mailto:sxh@nei.org] **On Behalf Of** PERKINS-GREW, Susan
Sent: Tuesday, January 05, 2010 4:25 PM
To: FEMA-POLICY,
Subject: Docket ID: FEMA-2009-0001 - NEI Comments on Docket Number FEMA-2009-0001, 74 Federal Register FR 57508, November 6, 2009

January 5, 2010

Office of Chief Counsel
Regulation and Policy Team
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street, SW
Room 835
Washington, DC 20472-3100

Subject: NEI Comments on Docket Number FEMA-2009-0001, "Telephone Survey Related to Alert and Notification Systems," 74 Federal Register FR 57508, November 6, 2009

The Nuclear Energy Institute (NEI), on behalf of the nuclear energy industry, is pleased to comment on Docket Number FEMA-2009-0001, "Telephone Survey Related to Alert and Notification Systems," 74 Federal Register FR 57508, November 6, 2009.

NEI believes that the telephone survey is an inappropriate method for obtaining the desired results described in the supplementary information section of 74 FR 57508. The basis for why the survey will not produce data relevant to the three stated goals is provided below.

1. Confirm that the siren system achieves an operability standard of greater than or equal to 90% in the twelve month period prior to approval of the system.

NEI Response:

Questions asked in the survey pertain to activities related to a single audible test of the siren system on a given date. In addition, members of general public surveyed may have been at work or not heard the siren because the test may be of a short duration by procedure. Or, members of the public surveyed may not be even aware of the test. These circumstances could cause the reporting of inaccurate data to FEMA. Therefore, no conclusion can be drawn pertaining to operability within a twelve month period based on the survey results.

2. Determination that the alert and notification system testing results have been completed in accordance with approved procedures.

NEI Response:

Members of the public are not familiar with the procedures related to the alert and notification system. Therefore, it is not reasonable to determine, by a telephone survey, whether testing results have been completed in accordance with approved procedures.

3. Siren operability remains at or above 90%.

NEI Response:

Siren operability is determined by calculating the ratio of the number of sirens that activated upon demand to the total number of sirens for which activation was demanded. The public has insufficient information to know whether or not the ratio described was above 90%.

Emergency Planning Zone (EPZ) populations vary from a few thousand, and in some areas, greater than one hundred thousand. Therefore, finding 338 respondents at home to respond to the survey will be difficult in some EPZs and might be demographically biased in others.

In conclusion, the telephone survey as proposed will not produce data relevant to the stated reasons for conducting the survey. Further, the survey should be abandoned as a means for gathering data on alert and notification system (ANS) performance. U.S. Nuclear Regulatory Commission (NRC) licensees are required to maintain detailed records of system operability. The records document the results of testing performed in accordance with the ANS design specifications and are part of NRC's performance indicator system for its nuclear power reactor licensees. Reviewing records of system operability described above would be a more appropriate means to obtain data to best suit FEMA's interests.

Please do not hesitate contact me at (202) 739.8016; spg@nei.org if you have any questions.

Susan Perkins-Grew
Director, Emergency Preparedness

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NUCLEAR ENERGY INSTITUTE

Susan Perkins-Grew

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EMERGENCY PREPAREDNESS

NUCLEAR GENERATION DIVISION

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¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear material licensees, and other organizations and individuals involved in the nuclear energy industry.

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Sincerely,



Susan Perkins-Grew

c: Mr. James R. Kish, FEMA