



FEMA

COPY

January 25, 2010

Ms. Susan Perkins-Grew
Director, Emergency Preparedness
Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

Dear Ms. Perkins-Grew:

We received your letter dated January 5, 2010 in which you commented on our Federal Register Notice, "Telephone Survey Related to Alert and Notification Systems" (74 FR 57508 November 6, 2009; Docket Number FEMA-2009-0001).

The Federal Emergency Management Agency (FEMA) is responsible for providing guidance regarding public Alert and Notification Systems (ANS) around commercial nuclear power plants.

The Federal Register Notice describes the objectives in conducting a telephone survey of a sample of residents within the emergency planning zone (EPZ) around commercial nuclear power plants. These objectives are:

- 1) Confirm that the siren system achieves an average operability standard greater than or equal to 90 percent in the twelve-month period prior to approval of the system. Public safety is paramount in assessing and evaluating ANS. The telephone survey data collection is only one of the many parameters used in the review and evaluation of the ANS. It is imperative that the telephone survey be used as a tool to estimate the proportion of households which were actually alerted by ANS. A telephone survey performed after an alert and notification test has merit in that the data received, along with other performance data, is used to compare against the 90 percent average annual operability standard to determine the effectiveness of the ANS. Households reporting in a telephone survey that they either were, or were not, notified during an ANS test, provide valuable information concerning the effectiveness or potential issues with the ANS itself, as well as other external factors affecting the ANS. FEMA must utilize every means possible to assure the public is notified properly of pending danger. Commenters must understand that multiple data sources will be utilized; including test data, maintenance data, and telephone surveys to assure that the public can be properly alerted and notified.
- 2) Determination that the Alert and Notification System ANS results have been completed in accordance with approved procedures. In order to satisfy the alert and notification aspects of

44CFR, 350.9(a), a telephone survey is conducted of residents within a nuclear power plants EPZ as soon as possible following completion of an alert and notification system activation. Detailed procedures for accomplishing the ANS testing are included in all acceptable emergency plans, which also require monthly alert and notification system communication drills among the state and local officials specifically responsible for activating an ANS. The telephone survey data is only one of many data sources used in the compilation and evaluation to determine if the ANS achieves the required results.

- 3) Siren operability remains above 90 percent. The 90 percent average annual operability requirement is verified by evaluating data from individual tests, as well as trend data resulting from multiple tests over a period of time.
- 4) Emergency Planning Zone Populations. The universe for an alert and notification survey consists of all residential, non-institutional households within the EPZ of each commercial nuclear power plant located within the United States. While this area is generally a 10-mile radius circle, with the nuclear power plant as the center point, it may sometimes include areas extending beyond 10 miles. The figure of 338 respondents used in the annual hour burden section of our Federal Register Notice, is a representative sample size relative to the population within the EPZ.

FEMA appreciates your thoughtful comments. It is FEMA's intent that the telephone survey data is only one of many data sources used to determine ANS performance, reliability, availability and effectiveness. The telephone survey provides valuable insight to verify that the population, which we are committed to protect, has actually received an alert and notification immediately following activation of a commercial nuclear power plant's alert and notification system.

Should you have any questions regarding this matter, please contact Mr. Russ Gates at (202) 212-2196.

Sincerely,



Vanessa E. Quinn

Branch Chief

Radiological Emergency Preparedness Program