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J. O'Brien



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COMMONWEALTH of VIRGINIA

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December 17, 1999

David L. Meyer
Chief, Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001


Dear Mr. Meyer:

I am writing in response to your request for comments regarding the revised criteria for post accident sampling systems, published in the Federal Register on Wednesday, November 24, 1999. Elimination of the post accident sampling system (PASS) would not have an adverse effect on the off-site emergency response organization's ability to respond to either the plume phase or the recovery phase of a power reactor accident.

In my fifteen years experience with nuclear power plant exercises and four actual Alert declarations, the basis for issuing protective action recommendations (PARs) are: an accurate description of the plant's status by the utility, a pre-designated ten mile emergency planning zone (EPZ), and EPA's protective action guidance. Other information that the utility provides such as isotopic release rates, and noble gas to iodine ratios are useful inputs to computer models. Computer models may provide emergency responders some reassurances that their protective action recommendations were adequate; however, computer models occasionally have grossly over estimated release rates beyond the ten- mile EPZ. The data from off site field teams taking area readings and field samples are used to verify the adequacy of the PARs.

During the recovery phase or the post plume phase, off site radiological health decision makers will base their recommendations on actual field data within the 50 mile ingestion planning zone. I thank you for your consideration of these comments.

Sincerely yours,


Leslie P. Foldesi, M.S., CHP
Director, Radiological Health

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