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J. O'Brien



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Nov. 24, 1999

Jeb Bush  
Governor

Robert G. Brooks, M.D.  
Secretary

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RULES & DIR. BRANCH  
January 6, 2000

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

SUBJECT ATTENTION TO: Rulemaking and Adjudication Staff

Dear Mr. Meyer:

This letter is in response to the notice of request for comment published in the Federal Register (Vol. 46, No. 226/Wednesday, November 24, pp.662113-66214) to seek input from all stakeholders on the elimination of the Post Accident Sampling System (PASS). After reviewing PASS in relation to our decision making process during a power plant accident, our staff has come to the following conclusions.

Many of the crucial decisions that would be necessary for the protection of the public would have already been made. The timeliness of the information provided by PASS is too slow to be meaningful in an emergency situation. The emergency action levels and Protective Action Recommendations are based on plant conditions. Core damage is assessed through monitoring in plant instrumentation. This information is available much faster than that resulting from the analyses of samples collected several hours earlier.

While at the onset, the concept of PASS may have given decision makers confidence by having another diagnostic tool on which to rely, this time has passed. Protective action decisions will be made considerably faster than PASS information can be made available.

The elimination of PASS would not have an adverse effect on Florida's ability to respond to a nuclear power plant incident.

Sincerely,

William A. Passetti  
Chief  
Bureau of Radiation Control

Add:  
J. O'Brien

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