

**PRM-50-85
(72FR37470)**



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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**Office of the Mayor
The City of Harrisburg**

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8

Stephen R. Reed
Mayor

(717) 255-3040

August 21, 2007

**The Secretary
United States Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852**

Dear Secretary:

This letter is submitted pursuant to the provisions of law which permit public commentary on proposed regulations pending before the Commission for prospective enactment.

Specifically, our comments are related to Docket No. PRM-50-85, 10 CFR Part 50, under the proposed rules section published in the Federal Register of July 10, 2007 (Volume 72, Number 131).

The proposed rule change would require that all host school pick-up centers, for schools located within the ten mile EPA surrounding a nuclear generating station, would be a minimum of distance of five to ten miles beyond the radiation plume exposure boundary zone to insure that all school children are protected in the event of a radiological emergency.

The City of Harrisburg, a portion of which is within the ten mile EPA of the Three Mile Island Nuclear Generating Station, expresses its strong endorsement and support of this proposed rule. It should be noted that we do, in fact, have schools within the ten mile EPA that would be affected by this rule.

Not only would this rule serve to enhance the safety and protection of children and young adults in the event of a radiological emergency but it would additionally have some practical benefits.

At the time of the March, 1979 Three Mile Island Accident, I was serving as a Member of the Pennsylvania House of Representatives and was directly engaged in activities in response and reaction to that event. I therefore have direct knowledge of how the accident was

Template = SECY-067

SECY-02

The Secretary
Page 2
August 21, 2007

handled in 1979. Further, as the Mayor of Pennsylvania's Capital City, I have the duty and responsibility of assuring that an emergency management plan is fully in place that is sufficient to protect health and safety in the event of any manner and type of major incident, including a radiological incident involving Three Mile Island.

Locating the school pick-up center at a minimum distance of five to ten miles from any affected school within the EPA would represent a far more effective means of directing the travel and attention of parents, guardians and others away from the EPA, thus avoiding any prospect of an inundation of any affected school within the EPA while a radiological incident would be occurring. This has the practical effect of reducing traffic volume within the EPA, allows for the rapid removal and protection of students and faculty, and would give a greater sense of assurance that students are being removed from potential hazard in a timely and efficient manner. Moreover, the affected schools in the City of Harrisburg are all of the elementary grade levels and pre-school which, in our case, would be neighborhood schools to which the majority of students actually walk. It is expected, therefore, that the same parents of these students, whose home addresses are likely also in the EPA, will themselves be evacuees. This eliminates the inevitable delay of evacuation that would occur if parents and guardians had to first go to a close-by school or pick-up center to retrieve children prior to evacuation. Further, having the pick-up center safely sited at a place of no exposure to potential contamination would serve to hopefully reduce the anxiety level that the parents of students no doubt would be experiencing at any time of evacuation. There is likely nothing more disruptive than the prospect of parents streaming to a school building to pick-up children, a process that would delay the evacuation of both students and their parents.

For reasons of safety and emergency management efficiency, therefore, we believe that the recommended additional rule is appropriate and it has our support. We appreciate the Commission's consideration of the same.

With warmest personal regards, I am

Yours sincerely,



Stephen R. Reed
Mayor

SRR/klk

cc: Chief Donald H. Konkle
Chief Charles Kellar
Linda Lingle