

County of Allegan
Emergency Management

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PETITION RULE PRM 50-79

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January 23, 2003 (12:19PM)

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Sir,

In review of document no. PRM-50-79 and using our opportunity to respond to public comments on this petition. The following is my opinion of what I see in this document. As in most issue of these natures rules are developed without the local jurisdictions having a person with their interest and knowledge helping develop the petition / rule / law.

In this case I looked at this in several ways, first "is it necessary to rebuild the process" and the second "who covers the cost of putting these plans and activities in operation not in place but operation?" Local governmental units are dumped with these issues and have no possible way of taking care of them. So they either don't get done or they get done half way and that's not the best either. You'll also find an attached letter from Allegan Counties Radiological Officer Peter S. Hetzel who has written a complete and defined response and it's my part to reply from the local government's view.

Daycare:

- ◆ Even though Daycare Centers are a large concern for all of us there is more unregistered (Licensed) centers there is no possible way that we can cover them with local resources.
- ◆ Having KI stocked at the residence of these Daycare Centers is crazy!
- ◆ And if we could cover all Daycare Centers in our are then it would be some other group it has to be the responsibility of the caretaker to monitor local news etc... to local emergency events.
- ◆ We can not assign locations to Daycare Center when we don't even know where they are or who they are because more are unregistered then registered. Why should it be our issue to assign them they can go to areas assigned to the public currently?
- ◆ Providing additional or special transportation? Who covers the cost of this? Our county isn't into the business to providing "special transportation's" to private Daycare Centers.
- ◆ We do not have the funding and manpower to do annual inspections.
- ◆ Creating ID cards etc... who provides materials and manpower etc... to take care of this function.

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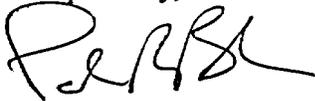
SECY-02¹

- ◆ Stocking the KI at Daycare Centers is like giving them to the general public to stock it's foolish and not practical and most likely it will be lost before it's needed.
- ◆ Special education to these locations, we don't have the manpower etc... to make this happen.

Don't get us wrong we are in favor of protecting our county residence and their guest but we have to practical about our methods and live with in our resources. Like all local units we are no different and are suffering from local and state financial funding problems and adding rules / laws / regulations that there is no way of us making possible these happen is crazy.

Thank you for reading my public opinion on these issues.

Respectfully,



Paul R. Baker
Director
Emergency Management