

EMERGENCY
PREPAREDNESS
WHAT'S WRONG?

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What's Wrong?

NRC's Basic Assumptions
Underlying Emergency
Preparedness Are Flawed

Projected Release

NRC:

- Biological impact and amount likely to be released minimized

What's Wrong?

- PAGs not based on BEIR VII
- Ignores potential releases from large scale accidents - e.g., spent fuel pool fire; accident interaction between pool and reactor; core
- TMI releases misrepresented

Affected Area - "Key Hole"

NRC:

- Airborne emissions only affect 2 miles around site, and a "key hole" from 2 to 10 miles

What's Wrong?

- Based on simplistic straight-line, Gaussian plume model; not suited complex sites (non-temporal, non-spatial).
- Need: advanced variable models and met. towers downwind

Dispersion - 10 mile EPZ

NRC:

- Airborne radioactive releases rapidly disperse to "safe" levels

What's Wrong?

- Local meteorology/geography - e.g., sea breeze, plume over water, gravity drainage, stagnations, reversals - are likely to contain, not disperse, plume

Notification

NRC:

- Primary: sirens, no backup power.
Backup: 45 min. to notify

What's Wrong?

- Sirens: Not heard inside; not mitigate equipment failure/LOOP
- Need redundant, e.g., reverse geo-coded 911, reader boards; IPAWS; EAS
- Backup: same capability primary

Evacuation Times Estimates

NRC:

Update ETE when population EPZ or ERPA < 90% or >110% current ETE

What's Wrong?

- Ignores other impacts on ETE – e.g., changes % children & infrastructure; shadow evacuation
- Preparation/ETEs based on “best case” scenarios, e.g., not peak traffic

Perception - Public Response

NRC:

- Most people will follow directions

What's Wrong?

- Public fears radiation > natural disasters - will respond differently
- Public: No confidence FEMA/NRC
- Sandia survey - methods unsound
- Public and local responders believe plans won't work

“Flexibility”

NRC

- “Flexibility,” not requirements

What’s Wrong?

- Public protection requires real performance-based standards.
- “Reasonable assurance” requires proof that protective measures work, not simply “complying” with “flexible” regulations.

Biennial Exercises

NRC:

- 6 yr/cycle; allows no offsite PAR

What's Wrong?

- Allow drills without General Emergency
- Need 8 yr. cycle for less predictability and more variable scenarios, e.g., fast breaking, infrastructure failures, evenings, holidays, unannounced

Hostile Action Based Exercises

NRC

- Hostile action - one test in 8 years

What's Wrong?

- Incorporate HAB into NRC triennial Force-on-Force drills as tabletop component
- All drills should include PARs, and more realism, e.g., multi-pronged attacks, LOOP

EOFs Consolidated Facilities

NRC

- Not require near-site facility

What's Wrong?

- EOFs should be close to site; have access to real-time information from plant; enable face-to-face interaction between decision-makers

Going Forward

- For those of us near a nuclear power plant, plans are important.
- We ask the Commissioners to respond to the specific concerns Pilgrim Watch raised today.
- We need continued dialogue with you and Staff; and, going forward, equal participation in the process.