Jim Wood
Route 3 Box 1278
Dardanelle, AR 72834
November 28, 2000

William D. Reckley, Project Manager, Section 1
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Reckley,

Thank you for your October 26, 2000 letter regarding my April 5 response to NRC's public solicitation of comments and scoping of issues for developing an Environmental Impact Statement as part of your proposed operating license extension for Ark. Nuclear 1, Unit 1. In a June 6 NRC response, Mr. M. Christopher Nolan states, "emergency planning is not included within the review scope for license renewal" because it is a periodically evaluated existing program. Likewise, this rational would seem to qualify for EIS exclusion ANO plant equipment systems, which undergo an existing program of periodic testing, monitoring and evaluation by NRC and the utility. Excluding off-site public health and safety issues created through plant licensing is not in the public interest and seems inconsistent with your "continuing obligation" at 10 CFR 51.10(b).

I must reaffirm my previous conclusion that off site emergency planning to protect public health, safety, property values and the environment (NUREG-0654 Planning Basis) from "the worst possible accident, regardless of its extremely low likelihood" is created and influenced by NRC's licensing of ANO and thus qualifies as a connected part of the Human Environment for EIS analysis as provided by the NEPA Process/CEQ Procedural Provisions at 40 CFR 1500-1508. I find no regulatory authority for you to exclude NUREG 0654, Categorically or otherwise, from ANO's renewal licensing EIS, and request that you reconsider your decision to exempt this Issue from inclusion in your EIS documentation.

NUREG 0654 was developed and applied to the ANO Planning Zone without benefit of either an Environmental Assessment or Environmental Impact Statement, notwithstanding it qualified as a "Significant" action from the outset based on it's high level of public interest and controversy, 1508.27, within the Delaware Township/Logan County portion of ANO's EPZ.

My April 5 Issue Scoping comments clarified reasonable rational as to why setting evacuation route standards of maintenance qualifies as an Issue under the NEPA Process. NRC is the Lead Agency for development of an EIS for ANO license renewal, thus I expected the matter to be part of an NRC Action and not diverted to FEMA, Ark. State Health Dept. and local government for response. However, please allow me to clarify some evacuation route review comments in enclosed letters you received on July 27, 2000 from David Snelling and Ms Vanessa Quinn dated August 21.

In Ms Quinn's August 8 letter she describes a finding of evacuation route adequacy and "passability of County Roads" for the two rural Delaware Township routes depicted in the two attached photos, based on a July 24, 2000 driving tour conducted during one of the areas worst summer droughts. Since the East Logan County Citizens Committee entered this EPZ evacuation route project in mid 1980's and found disinterest in correcting the deficiencies from responsible NRC, State and local officials, we too have conducted "passability reviews" from time to time---not just during favorable dry weather summer conditions. The following photo reviews were taken on January 27, 1994.

Photo #1 depicts the condition of Logan County Road #130 (Delaware Bay Road). Twenty six homes are located on this evacuation route which has deteriorated during winter to the point that the rural mail carrier was unable to travel it in a 4 wheel drive vehicle.

Photo #2 depicts the condition of Logan County Road #98 (River Mountain Road). There are approximately 40 homes on this evacuation route.

I would very much appreciate a description of the evaluating methodology used by Ms Quinn and Mr. Snelling to conclude that non gravel, dirt evacuation routes in conditions depicted in these photos meet the test of complying with NUREG 0654, "worst case accident" at ANO where immediate automobile evacuation of Delaware Township is necessary to protect public health and safety.

Thank you for your October 26 comments and response to my April 5 submission of proposed Issues for your Agency's development of an EIS on ANO, Unit 1 license renewal. I reaffirm my position that NUREG 0654, and the Delaware Township evacuation route maintenance matter, is a connected part of ANO licensing and thus under CEQ Procedural Provisions at 40 CFR 1500-1508 should be included in your EIS analysis.

If you have further questions, please call me at (501)229-4449.

Best Regards,

Jim Wood

Jim Wood

cc & enclosure
Ms Vanessa E. Quinn
David D. Snelling

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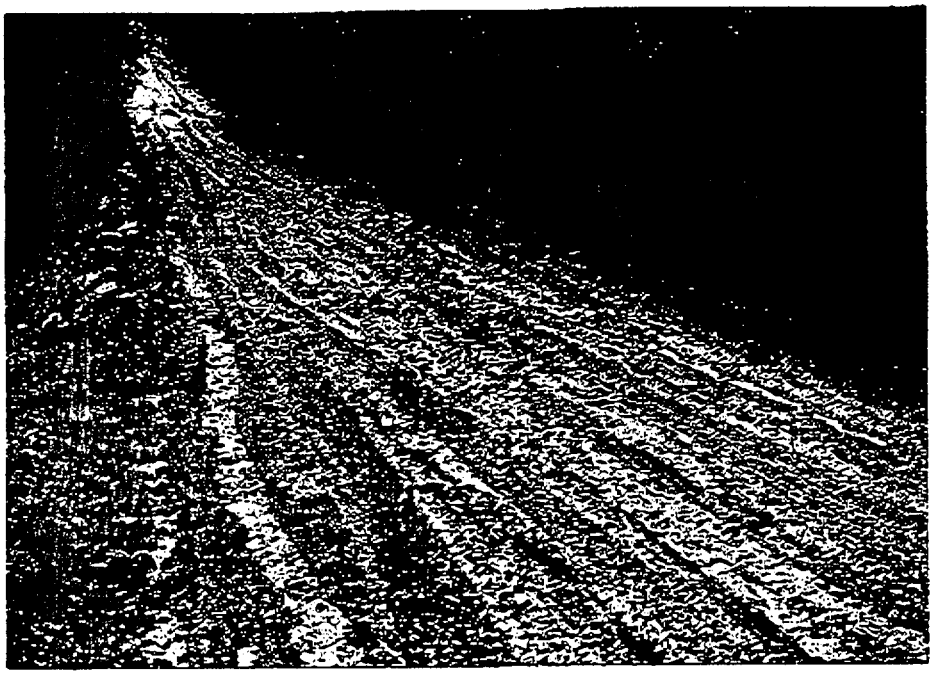

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