

**From:** Diane Jackson *NRR*  
**To:** George Hubbard, *NRR* Jocelyn Mitchell, Joseph Murphy, ... *LS*  
**Date:** Thu, Jul 13, 2000 2:19 PM  
**Subject:** Re: Public Comments on Report on SFP Risk at Decommissioning Plants

Tom, Joe and Jocelyn -

NRR would like your assistance in responding to the Board of Commissioners of Orange County (BCOC), North Carolina comments on our draft report (Spent Fuel Pool Accident Risk at Decommissioning Plants). The e-mails below provide additional details.

Tom and I scheduled to met on Monday, July 17 at 1:30 in Tom's office. George Hubbard, the NRR/SPLB is the lead of the project, will also be attending. *10E67*

Thank you for your help,  
Diane

>>> Joseph Murphy 06/30 4:19 PM >>>

George:

I'm not completely familiar with the exact calculations that have been done, so i must be more general. When the MACCS models were created, the economic models were intended to consider the economic long-term interdiction of land. The sociological impacts have not been considered to my knowledge. The economic models were updated, at least in part, about 10 years ago. Jocelyn Mitchell may know the degree to which they were updated with 1990 census and Statistical Abstract of the United States data.

A key point here is that the probability of large scale contamination is very low. The accident itself is of low frequency. To get large contamination requires adverse wind speed and stability and assumptions regarding when and if it rains. All these have distributions that must be propagated.

One complication is that off-site actions are not within the NRC's jurisdiction. Decisions on crop and land interdiction, or evacuation are made by others, usually the state. EPA has issued guidelines and NRC can advise them, but it is their decision. Thus, assumptions in this area can have large uncertainties.

I'd be glad to meet with you. However, I'll only be in the office 7/10-the morning of the 11th, and 7/12, between now and the 17th.

Joe Murphy


>>> George Hubbard 06/30 10:55 AM >>> *NRR*  
In response to the issuance of our draft final report on SFP risk at decommissioning plants, the Board of Commissioners of Orange County (BCOC), North Carolina provided comments on our report. BCOC is a party to the on going hearings on the Harris SFP expansions hearings.

Among their comments were the following:

" The Draft Study completely sidesteps the question of where all the people who are relocated will be able to go for the decades that must pass while the land where they live recovers from radioactive contamination. This issue is graphically illustrated by the consequences of the Chernobyl accident, which rendered huge land areas uninhabitable and unsuitable for agriculture for an extended period of time."

" Finally, the Draft Study fails entirely to address the social and economic implications of losing the use of thousands of square kilometers of land for several generations."

*Q/205*



While their comments are correct in the fact that we didn't address the specified issues in the report, I believe we need to say more than yes we didn't address those concerns. I believe we need to provide some explanation as to why we didn't consider these issues. This would explain the agency policy on how we consider these items or why we do not consider these issues in our regulatory evaluations. In order to respond appropriately we talked to Janice Moore and she suggested we talk to both of you to prepare our response.

Can either of you provide some insight and guidance as to what our response should be? If you could email some information for preparing a response or better yet words for an actual response it would be appreciated. As an alternative, we could meet with you and discuss the issues so that we can prepare the response.

Thanks for your help,

George Hubbard  
2870

