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From: "Lisa Gibney" <gibneylisa@mcleodusa.net>  
To: <CAG@nrc.gov>, <MTL@nrc.gov>  
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Subject: Response to Petition PRM-50-79

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Ms. Gallagher and Mr. Lesar:

I tried to send a response to the Petition of Mr. Lawrence Christian while I was away from home on business last week and I couldnt get through from my hotel. I would submit my comments again now that I am home and ask that they might be given consideration if possible.  
Thank you very much...

Lisa Gibney

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Template=SECY-067

SECY-02

As a mother of two children who live and attend school within an Emergency Planning Zone (Duane Arnold Energy Center), an Emergency Management professional, I would like to respond to the petition of Mr. Lawrence T. Christian.

Mr. Christian has made several comments that paint a picture that the nuclear industry does nothing to ensure the safety of pre-school and daycare age children. That is simply not true. All nuclear utilities are required under NUREG0654/FEMAREP1 to develop specific plans for all "special needs populations" which refers not only to pre-schools and daycares, but all K-12 students, nursing homes, group homes for physically or mentally challenged individuals and those who are mobility challenged as well such as those in correctional facilities. To paraphrase these plans have requirements, which include:

- Identifying the population of such facilities
- Determining and providing protective actions for these populations
- Establish and maintain notification methods for these facilities
- Determine and provide for transportation and relocation of the clients/residents

Plans are finalized and submitted for FEMA to review on an annual basis. The plans are demonstrated at a biennial exercise for each nuclear power station. If plans or procedures are found to be inadequate they must be addressed using FEMA remedial guidance.

In particular Mr. Christian has outlined certain elements that he feels should be addressed. I would like to speak to those proposals and let you know what actions are currently taken by the power plant in my area as outlined in our community emergency plans and our local community telephone books.

1. *Assign a designated relocation center outside the evacuation zone*— This has been done for our school and pre-schools. The relocation centers are published in our local telephone books and many schools include this information in their parent handbooks.
2. *Provide transportation to the designated relocation centers*- Again, transportation of school children for a nuclear power event or **any emergency situation** is already part of the local emergency plans through our Linn County Emergency Management Agency.
3. *Transportation in approved car seats*- While a noble sentiment, this is extremely unpractical in an **Emergency situation!** During emergency situations there simply is not enough time to properly secure infant and child seats in enough quantity to facilitate moving the entire centers population. The sheer time required to undertake such a task precludes this being an acceptable "protective" action. In fact, taking the time for installing car seats would actually **delay** the evacuation of the children! Factor in the impossible task of trying to keep an accurate number of age/weight appropriate car seats available for a constantly growing group of children and this obviously becomes an impractical solution.
4. *Create a roster of emergency bus drivers for emergency evacuation and a way to notify them*- Again, as part of our Multi-Hazard plans for our community our local Emergency Management Agency has Letters of Agreement with our local school districts transportation officials, our Metro bus department and our County transportation office that handles our daily special needs transportation to provide both bus resources and drivers in emergency situations. Those departments have an existing notification system to reach drivers in non-scheduled work times.

5. *Notification of individual pre-schools of an emergency-* Our local nuclear power plant has provided indoor warning radios and/or NOAA weather radios for ALL special needs facilities to warn of **any** impending emergency.
6. *Annual site inspection of daycares by local emergency management officials-* Inspections are done by our State Department of Human Services, and our local Emergency Management officials promote and provide a voluntary service including training for all hazards (including Tornado preparedness which is a constant concern in our area) and physical inspection of facilities for hazard mitigation.
7. *Participation in Exercises-* Surely Mr. Christian isn't suggesting that we disrupt such young children with an actual evacuation of the facility. In our community, training is available through our local Emergency Management Agency for In-Service staff training on proper evacuation techniques and all facilities are welcome to participate in Emergency Operation Center decision making activities.
8. *Creation of Identification Card, attendance lists, fingerprint records-* it is reasonable to assume the daycare is already in possession of the class lists of each classroom and again the issue of photo id, etc., is best left to each individual facility to address with their parents which will allow for other considerations such as a right to privacy and increased costs incurred with keeping current photos for a constantly changing and growing population. This would best be addressed as a local issue.
9. *Development of educational materials for parents-* Our local power plant is already required by regulation to provide such information. In our community that information is published in our local telephone book. Included in the publication is a list of the schools potentially affected and the relocation site for those schools. Schools, pre-schools and daycares in our area also often times include that information in their parent's handbook.
10. *Stockpiling of KI at daycare areas-* KI in itself is a separate and distinct issue. Personally, as a Mother, I am not inclined to give my children any kind of medication if it's not absolutely necessary. I also have concerns about proper distribution of this drug since it is not available in multiple dosages as needed for children of various size and weight. I am also concerned about delaying the evacuation in order to give this drug. Have you ever tried to give medicine to a 3 year old? It is not an easy task. Take the cajoling needed times 20 or 30 toddlers and suddenly this is a monumental task which many day care workers have not been trained to do. Again, taking the time to implement this suggestion would only **delay** any evacuation. And if you wait to distribute KI until you have reached the relocation centers, then the need is no longer there since the children are no longer in the Emergency Planning Zone.
11. *Provide training for all daycare/pre-school center employees about radiological emergencies.-* Training for radiological emergencies is already offered in our community. It is often combined with a multi-hazard approach to address all Hazards in the community. Some of this training may also be addressed by the State licensing requirements of each individual State.
12. *Listing the designated relocation centers available to parents-* Again this relocation information is published in our local telephone book and again is easily disseminated in parent handbooks.
13. *Establishment of a toll free or 911 type telephone lines to provide information about emergency plans and procedures to parents-* I'm not sure what Mr. Christian's intent is here. **In any case, calls to 911 would never be appropriate, as that line is reserved for emergencies only!** As for a toll free line, in our community our local power plant has trained their customer services representatives from the utility to give that information to the public. This service is available in non-emergency times as well for review in a non-stressful time. Also provided is a pre-recorded explanation of emergency plans that is available through our local community information system

provided by our local telephone company. This recording is also available 24 hours a day which allows the public to review the information at their leisure in non-emergency situations.

14. *Creation of written scripts for local emergency broadcast system that includes information about the evacuation plans-* I believe that the information that Mr. Christian is requesting is included in the regulatory requirements already in place with current FEMA regulations regarding the Emergency Alert System. Again, I can only speak to the plans in our community, but we utilize a combination of pre-scripted information and a message generation computer software that allows our emergency management personnel to make use of the most current information available in any event for public information purposes.

In summary, I'd just like to say that while I applaud Mr. Christian's concern for the health and safety of children everywhere, I would assert that many of his concerns can be remedied with improved communications with local emergency management officials and WITHOUT further regulation. I would hope that the Commission would review with the applicable FEMA Region the existing plans and procedures for the State of Pennsylvania as well as the local nuclear power station(s) before instituting any new regulatory measures. FEMA does a thorough review of the emergency plans of every commercial nuclear power plant. If his local plant is satisfactorily demonstrating their ability to exercise those plans than many of Mr. Christian's concerns may already be addressed in existing plans that Mr. Christian may not be aware of.

I would also suggest that Mr. Christian's concerns should not just be applied to radiological risks but also to any hazard in his community. It is worth noting that there are potentially many hazards that may impact children; a nuclear power accident is very low on the probability scale. And even if an event were to happen, with the amount of redundancy built into the basic safety systems of any licensed nuclear power facility, the utility and the community would have several hours of advance notice prior to any radiological release to take protective actions for daycare centers or any special needs population. One of my reasons for writing to the Commission is that I would like to be sure that we don't lose focus on the *entire* emergency preparedness picture and apply new regulations that would divert a disproportionate amount of resources towards a hazard that is very unlikely to occur. The time and resources needed to increase the oversight for this unlikely radiological hazard to the levels Mr. Christian advocates will take already scarce resources away from other hazards that are more likely to occur.

Thank you for taking the time to review my comments.

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