EDO Principal Correspondence Control

FROM: DUE: 02/22/05

EDO CONTROL: G20050032
DOC DT: 01/18/05
FINAL REPLY:

Mary Elizabeth Lampert
Duxbury, Massachusetts

TO:

Chairman Diaz

FOR SIGNATURE OF : ** GRN ** CRC NO:

Dyer, NRR

DESC:

2.206 - Pilgrim Nuclear Power Station

ROUTING:

Reyes
Virgilio
Kane
Merschoff
Norry
Dean
Burns
Collins, RI
Cyr, OGC
Skay, NRR
Goldberg, OEDO

DATE: 01/21/05

ASSIGNED TO: CONTACT:

NRR Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: Jan 21, 2005 09:28

PAPER NUMBER:	LTR-05-0034	**LOGGING DATE:**	01/18/2005
ACTION OFFICE:	EDO		
AUTHOR:	Mary Lampert		
AFFILIATION:	MA		
ADDRESSEE:	Nils Diaz		
SUBJECT:	Pilgrim NPS		
ACTION:	Appropriate		
DISTRIBUTION:	Chairman, Comrs		
LETTER DATE:	01/18/2005		
ACKNOWLEDGED	No		
SPECIAL HANDLING:	2.206 Petition...Made publicly available in ADAMS via SECY/EDO/DPC....		
NOTES:			
FILE LOCATION:	ADAMS		
DATE DUE:		**DATE SIGNED:**	

January 18, 2005

Commissioner Nils Diaz
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Fax 301-415-1757
Email vmb@nrc.gov

Dear Mr. Chairman:

As you know Duxbury, Massachusetts is within the Pilgrim Nuclear Power Station's Emergency Planning Zone. My residence is approximately 6 miles across open water from the reactor. Therefore, safety at Pilgrim NPS is a primary concern due to its potential direct impact upon my family's health, property and community.

I request that this correspondence be regarded, and treated as, a 2.206 petition.

Summary

Reactor: Pilgrim Nuclear Power Station, Plymouth, Massachusetts

Request for Enforcement Action: Require Pilgrim NPS to cease operations until proper notification equipment is installed throughout the Emergency Planning Zone to enable residents and transients to be notified within the required approximate 15 minutes.

Facts that constitute the basis for taking this action: discussed herein.

Discussion

1. I am filing a 2.206 petition as the only means available to me to address safety concerns at Pilgrim Nuclear Power Station. The public warning system now does not provide reasonable assurance that in the event of an accident resulting in a large release of radiation the residents and transients within the EPZ will receive timely warning. Therefore Pilgrim Station is operating without a functional emergency response plan.

2. Pilgrim Nuclear Power Station public warning system cannot pass minimum standards of operability under 10 CFR 50, Appendix E, § (D), (E), and other applicable regulation. 10 CFR 50, Appendix E (D) states,

The design objective of the prompt public notification system shall be to have the capability to essentially complete the initial notification of the public within the plume exposure pathway EPZ within about 15 minutes. The use of this notification capability will range from immediate notification (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where a more substantial amount of time.

3. Pilgrim Station has installed sirens in many areas in the Emergency Planning Zone. However, these are simply outdoor warning systems. This is because if they were loud enough to be heard indoors over normal ambient noise they would damage the hearing of those close to the sirens. I can attest to the fact that they can not be heard in doors from my own experience and from informally polling citizens in my community.

4. It is important to have an outdoor warning system; however it is equally important to have an indoor warning system for those who work, sleep and are inside residences or work places for all or any portion of the day. Additionally, Pilgrim's EPZ is located in a climate that is not conducive to having windows open all, or even most, of the year; and when it is warm enough to have a window ajar, many people and businesses now have air conditioners - meaning that windows are generally closed the entire year.

5. Also, Pilgrim's sirens have been unreliable. They failed 12 times from January 2000 to January 2004. For example, in January 2004, nearly 80 percent of the newly installed emergency sirens used to warn about 100,000 residents in five towns about a disaster at the Pilgrim Nuclear Power Station failed to operate. The latest siren failure came after a brand-new siren system was installed. Redundancy is an important component of safety; hence a combination of warning systems is required – and importantly, the systems must be audible both inside and outside – now they are not. Notification means that the intended recipient hears, receives, the message.

6. The present back-up system, known as route notification, calls for local police to drive up and down streets where sirens fail to warn residents over their PA system. Route notification takes considerably longer than 15 minutes. Route notification is a waste of now scarce human resources and will not accomplish the task – at best some folks who happen to be outside on streets that the local police happen to drive may receive notice. The towns within the Emergency Planning

Zone have large wooded areas; and areas with houses on large lots sited and landscaped to provide privacy and quiet - away from the street and traffic noise. Also the EPZ towns each have many miles of roads – Duxbury, for example, has 127.54 miles of roads[1]. Plymouth, the host community, and largest town in the Commonwealth, has 521 miles of roads[2]. . It is clear that:

- Local police and emergency personnel are not capable of covering roads in approximately 15 minutes – too many miles of roads, too few personnel;
- The PA systems or bullhorns on those vehicles are unlikely to be heard inside due to how property is sited, landscaped, insulated and the real uncertainty of whether windows will be open.

7. Technology exists today that would fill the current void and bring licensees into compliance – that is notify residents and transients inside houses or buildings. The system is generally known as rapid dialing systems and has been in use in many communities for many years. It is tested. Rapid dialing systems have the capability to notify workers and every household and business within the EPZ in approximate 15 minutes. For example, one company's (Dialogic Communications -DCC) phone bank has 500 phones capable of making 1,000 calls a minute, based on a 30 second transaction. Simply contracting to use two of their phone banks would permit contacting 30,000 households. More phone banks could be added, as required. Sigma Reverse 911 is another such system, many exist.

8. Another notification deficiency concerns notifying those in cars and trucks. We cannot assume that the driver has a radio on tuned to an Emergency Alert System. Sirens are not placed along our major highways, Route 3, for example; and even if they were so placed they could not be heard in a car above ambient sound.

9. Technology exists today to solve the problem – NRC requiring the installation of reader boards along the major routes within the Emergency Planning Zone. As an aside, reader or message baords are multi-purpose and can serve many purposes in an emergency.

10. Request for action: I request for the above stated reasons that until such time as Entergy, the licensee, has provided a workable emergency warning or alert system and NRC has verified its

[1] Massachusetts Highway Road Census, 2001: Town of Duxbury Roads = 99.96 miles; Mass Highway Roads = 18.39 miles; Private Roads = 9.19 miles

[2] Town of Plymouth Engineering Dept, 01/18/05: total town, state, private roads = 521 miles

operability, NRC order cold shutdown of Pilgrim Nuclear Power Station and/or take other such action as is within NRC's discretion to restore reasonable assurance of adequate protection of public health and safety.

I am aware that there is a four month period allowed for correction of emergency planning deficiencies in 10 CFR 50.54 (s) (2); however I request that this matter be given immediate attention because of the facts that nuclear reactors are terrorist targets; Pilgrim is located in "America's Hometown" perhaps making it an especially attractive target due to its symbolic value; Pilgrim is a BWR with a Mark I containment meaning that its spent fuel is stored high up in the main reactor building, outside primary containment, vulnerable from three sides; and Southeastern Massachusetts is now highly congested.

I look forward to your response and am sincerely,

Mary Elizabeth Lampert
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Mail Envelope Properties (41ED4B1F.335 : 7 : 33589)

Subject:	2.204 Petition - please achnowledge receipt via return email
Creation Date:	1/18/05 12:44PM
From:	"lampert" <lampert@adelphia.net>
Created By:	lampert@adelphia.net

Recipients
nrc.gov
owf5_po.OWFN_DO
VMB (Vicki Bolling)

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Files	**Size**	**Date & Time**	
MESSAGE	8369	01/18/05 12:44PM	
TEXT.htm	26173		
2.206 petition notification inadequate emergency planning 1.05.doc			44032
Mime.822	99736		

Options

Expiration Date:	None
Priority:	Standard
Reply Requested:	No
Return Notification:	None
Concealed Subject:	No
Security:	Standard