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October 31, 2005

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Submitted to <http://www.nrc.gov/public-involve/public-meetings/epreview2005.html>

**Supplemental comments of Nuclear Information and Resource Service regarding
the August 31-September 01, 2005 Public Stakeholders Meeting To Discuss Selected
Topics for the Review of Emergency Preparedness and Guidance for
Commercial Nuclear Power Plants**

Mr. Moody:

The circumstance of the public meeting convened by the Nuclear Regulatory Commission (NRC), Federal Emergency Management Agency (FEMA) and Department of Homeland Security (DHS) on emergency planning around nuclear power stations to occur simultaneous to the unraveling of the federal emergency response, namely those FEMA actions to the devastation that Hurricane Katrina wrought on the Gulf Coast was ominously disturbing. As the federal agency mandated with the public health, safety and security around nuclear power stations, it is incumbent on NRC to learn the lessons of FEMA's failures and expeditiously apply them to radiological emergency preparedness.

Given that federal emergency planning and response authorities were given an advance notice of the approaching and intensifying storm by as much as 3 to 4 days, a crisis of public confidence has deepened over not only storm related disasters but also potentially faster breaking radiological catastrophes from a breach of containment as the result of an accident or act of sabotage involving a commercial nuclear power reactor and /or its on-site high level nuclear waste storage systems.

Clearly, current Evacuation Time Estimates (ETE) used for planning development for nuclear power plant accidents and acts of terrorism need to be re-evaluated in context of globally televised realities of the Gulf Coast evacuations. Dubious ETEs have repeatedly been the subject of licensing proceedings for numerous nuclear power plant sites. The agency displayed a cavalier disregard for such realities in proceedings such as at the Seabrook and Shoreham licensing.

The NRC is obligated to put out for public comment and promptly incorporate all new analysis and findings obtained from the mass evacuations for Hurricanes Katrina and Rita into supplements to "Development of Evacuation Time Estimate Studies for Nuclear Power Plants" (NUREG/CR-6863) and its "Identification and Analysis of Factors Affecting Emergency Evacuations" (NUREG/CR-6864).

NIRS also points out that confusion within the agency and the affected public still prevails over the actual scope of initial and subsequent planning, preparedness and implementation needs for nuclear catastrophe. During the August 31st stakeholders meeting, NIRS pointed out that NRC Background papers on emergency planning conveyed that current plans focused on a two-mile radius out to ten-miles downwind.

NRC and industry have concluded that initial protective actions need only be provided for a two-mile radius and out to five-miles downwind of nuclear power stations. This short-sighted planning and preparedness is economically driven and inadequate given the demonstrated reality of the April 26, 1986 Chernobyl nuclear catastrophe in Ukraine with population relocations conducted out to an 18-mile radius. Despite Chernobyl's different design features with U.S. reactors, a core damage accident associated with a breach of containment and/or a zircoloy fuel fire following the drain down of a high-level radioactive storage pools dispersed into the atmosphere and varying weather patterns has far reaching consequences far beyond what we believe to be NRC's current politically and promotionally motivated limitations.

NIRS is interested in how depositions of radioactive plumes and deposition and source term were determined to be of no initial concern for initial actions beyond 5 miles downwind, particularly given that the NEI White Paper "Range of Protective Actions for Nuclear Power Plant Incidents" July 08, 2004, apparently endorsed in total by NRC, states "Continuous and rapidly changing conditions, lack of or inaccurate instrumentation and uncertainty of the timeliness and effectiveness of mitigation actions make such a prediction (use of sheltering as an alternative action to evacuation for short term releases) inherently inaccurate. Moreover, choosing to shelter a population rather than evacuate based on erroneous release duration estimation can result in significant health effects on that population."

NIRS requested at the August 31st stakeholders meeting that NRC publicly identify and make these documents available for public and independent review. NIRS reiterates its request in these remarks.

NIRS further notes that NRC efforts towards "prompt notification" ignore a disturbing fact of widespread public notification problems involving inoperable siren systems without emergency power backup systems. The fact that these conditions linger interminably is inexcusable particularly with NRC refusal to consider timely actions under its own emergency enforcement petition process. Instead, NRC offers the excuse that it is waiting on the glacial pace of FEMA activities to what are in fact NRC licensing and regulatory compliance issues, while communities remain inadequately prepared to be promptly notified in the event of an accident or act of sabotage.

Time and time again, NRC has placed the financial interests of its licensees ahead of reasonable safety public health, safety and security concerns. The continued disregard for emergency planning issues is akin to the stripping of coastal wetlands around New Orleans by the U.S. Army Corp of Engineers for the purpose of promoting commerce leaving inadequate levees to await the devastating arrival of Katrina.

It seems that NRC is playing the same dangerous probability game in hopes of avoiding the big one.

Sincerely,

Paul Gunter, Director
Reactor Watchdog Project