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License Renewal and Environmental Impact Program United States  
Nuclear Regulatory Commission  
Region 1  
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December 19, 2005

Dear Madams or Sirs,

On November 17, 2005 I attended the second session of the Nuclear Regulatory Commission's public hearing in Scriba, New York on the Generic Environmental Impact Statement for License Renewal of Nuclear Plants: Supplement 24: Regarding Nine Mile Point Nuclear Station, Units 1 and 2: Draft Report for Comment. I commented that I had co-authored a report titled, *Nine Mile Point Nuclear Surveillance Program - A Summary* and was asked by NRC officials to forward this same report for the licensing review. Please find this report enclosed. This report consists of an investigation into the monitoring program of the New York State Health Department years of 1976 through 1988. While the report is primary an overview, it includes recommendations to improve the monitoring program.

In addition to the enclosed report, I would like to make written comments on the application for the license extension for Unit One and Two at the Nine Mile Point in Scriba, New York that currently operate under National Grid.

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## Information Meeting

I was extremely disheartened by the fact there were no elected officials in the audience. This reinforces the notion felt by many citizens that elected officials are not concerned about the socio implications of the nuclear plants. Rather concern lies with the economics, only. These facilities have often been referred to as the "Golden Goose" of Oswego County.

I am concerned the informal comments and concerns that were voiced are not being transcribed as comments for license renewal. The citizens asked important questions during this time. The facilitator should have stressed that no comment made during the informal meeting were going to be put into the comments for consideration or be addressed. Had this been addressed, the potential for more oral comments might have existed.

### 2.2.4 Air Quality

The generic impact statement indicates that the diversity of climate at Nine Mile Point is not usually encountered within such a small area. It further states that the meteorological data recorded for Ithaca, located in north central New York, are generally representative of the Nine Mile Point Area. What the report fails to communicate is that Oswego County may have notable snowfall from October to May. Snowfall, up to 3 feet have accumulated in this area overnight. The area experiences blizzard conditions during the winter and many snow advisory or warning are issued. Because this area is very unique, the meteorological data could be collected on site.

### Oswego County Evacuation Plan

Oswego County's Evacuation Plan requires revision. The safety of the local citizens should be a primary concern and this plan should be updated regularly. The evacuation information is now located on the back of a scenic Oswego County calendar. Rather than address the potential and serious consequences of a possible release of radiation, spectacular landscape now captivates citizens and weakens the importance of evacuation. Calendars may be good, if the citizens actually use these, thereby keeping the escape routes handy. However, the gravity of the information is buried. The problems that might arise from mass exodus have not been addressed. The citizens themselves have never been asked to act as volunteers, to take part in the evacuation plan, nor are they informed about contamination.

The evacuation plan has not considered the population expansion or decline in some areas. For example, there are four pick up sites for twelve homes on Lily Marsh Road and on Albright Road there is one pick up site for thirty one homes. Also in the aforementioned air quality, Oswego County experiences bleak weather conditions, which might make evacuation impossible or difficult at best.

The City of Oswego also hosts Harborfest. Upwards of 150,000 people attend this festival. I know of no brochures that are handed out to the tourists to assist in case of an evacuation. The evacuation plan should extend to the 50-mile radius around the Nine Mile Point area. At the Chernobyl nuclear accident, contamination spread as far as Europe.

Propaganda is dispersed through these calendar/evacuation brochures. It states that the release of radiation was minimum at the Three Mile Island accident, when indeed the radiation monitors were inoperative and the actual release of radiation is unknown.

### 2.2.7 Radiological Impact

I do not believe I received a clear and concise answer to my questions about meteorological data and highest exposure to radiation from the Nine Mile Point facilities. I was told that highest exposure occurs at the fence boundary. Does the highest exposure equate to highest deposition of particulate matter thus highest exposure, or from gamma ray exposure? If this is due to particulate matter, do sheering winds exist at the site that would cause radioactive isotope releases from the emission stacks to be directed in a downward plunge to the fence line? It would be my understanding that isotopes with greater atomic mass would settle faster and closer to the site, and that lighter, less dense isotopes would be transported by wind and be deposited further from the site. Depending on the wind speed carried miles from the site.

I asked about the maximum dose calculation and what were the gender, age and relative health of the individual for which dose is calculated. The answer I received was that a person living at the fence boundary, growing and eating vegetables, was the dose that is used. This answer does not quantify my question and is vague at best. I understand that that the releases of radiation are as low as reasonably achievable (ALARA). ALARA does not formulate a quantitative answer because of the variables of equipment and "normal" operations at the facility. ALARA aside, is this radiation exposure and calculation based on a young child who is a vegetarian and fed exclusively from the vegetables that would be grown on this fence boundary? Or, is this a healthy adult male who prefers to eat few vegetables in their diet? What type of vegetables do these hypothetical people eat? Certain vegetables would have greater uptake of specific radionuclide than others.

There are many variables in the human population. However, I would hope that the most conservative example would be used for the potential health effects of radiation exposure for local residents. Consider the infant that nurses from a mother that drinks the milk from a cow that grazes on the vegetation in the area around the nuclear plants. This mother also grows her family's vegetables on this same site? Also consider that this same cow becomes the meat the family consumes. Some of the families in Oswego County are getting radionuclide through much more than vegetables. This is the situation that exists for some of the residents around the nuclear plants in this area.

Potassium Iodide Pills

The Post Standard reported that only 20 Percent of residents in Oswego County have received potassium iodide (KI) pills. KI could help protect the thyroid gland in the case of a radiation release and exposure. With 80 percent of the population unprotected, concern should be raised about the potential health threat for the local citizens. Perhaps the KI pills could be mailed out with the batteries for the citizens in the five-mile radius that are used for the emergency alarms. Schools located out of the ten-mile radius are discouraged from acquiring KI pills even though these may be in areas of prevailing winds and potentially high deposition of radionuclide, or in areas that still may be affected by the fall out.

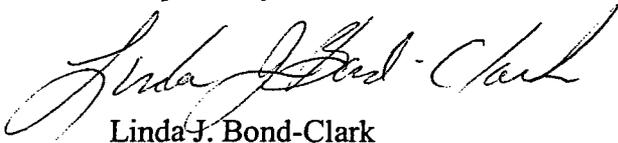
#### 2.2.9.1 Cultural Background

Fourteen farms were noted to exist at the time of the nuclear plants construction. To date, there are only two dairy farms located near the nuclear plants. Small farms, which once supplied a number of jobs in the area, are lost. While farms are not as profitable as the nuclear facilities, these did add many jobs to the area. This area is prime farmland and has more tillable soils and a longer growing season than Jefferson County.

Oswego County's migrant population should also receive information on the evacuation plan and have a chance to receive the KI pills.

Thank you for the opportunity to comment on the relisensing of National Grid' units One and Two located at the Nine Mile Point, Scriba New York.

Respectfully submitted

A handwritten signature in cursive script, reading "Linda J. Bond-Clark". The signature is written in black ink and is positioned above the printed name.

Linda J. Bond-Clark