

release

RIV
NRR
From: Art Howell
To: Michael Tschiltz
Date: Tue, Dec 7, 2004 12:13 PM
Subject: Re: Fwd: Cooper LERF/EP Question

Mike,

RIV
Yes. We spoke to Randy - he thinks one hour is doable for a plant like Cooper. Our EP folks concur, and about one hour is consistent with the estimates in their e-plan. By way of contrast, a plant like IP@ may take up 10 hours to effectively evacuate because of hte extremely high population density.

Art

>>> Michael Tschiltz 12/07/04 09:31AM >>>

NRR
Art.. I agree. The definition of LERF in my view creates the requirement to consider the effect of evacuation. The definition of LERF per RG 1.174 (footnote at the bottom of page 1.174-8) states that LERF "... is defined as the frequency of those accidents leading to significant unmitigated releases from containment in a time frame prior to effective evacuation of the close-in population such that there is a potential for early health effects."

I know that IIPB is concerned that we are inserting subjective judgement into the SDP since there is no true measure of evacuation probabilities and there is a number of factors (e.g., weather) than can impact the time to evacuate. I am of the view that we have to carefully consider the effect of evacuation and have a logical path to our conclusionand saying that we don't consider the potential to evacuate prior to the release is not consistent with the LERF definition. I believe this is consistent with what I said during the SERP...have you guys spoken to the EP folks (Randy Sullivan) about this?

Mike

>>> Art Howell 12/07/04 09:08AM >>>

Mike,

RIV
Whether we factor in evacuation times or not will be precedent setting. Given our definition of LERF, it seems to me that we would have to take into account evacuation time estimates. If we do not, it seems we would have to change our definition of LERF. In the case of Cooper, we checked with State EP reps., our EP experts, and reviewed Cooper's E-Plan. All these sources indicate that evacuation of the EPZ (around 4900 people) is achievable in about an hour, which is significantly less than the minimum time of 3.5 hours before vessel burn through. We have no data to refute this estimate. Given our current definition of LERF, I believe that the particulars of the Cooper evacuation estimates would need to be considered. Having said that, I have an open mind since this is a borderline case even on CDF. We just need to all recognize that regardless of the outcome, our decisions on LERF will be making case law if you will. Your thoughts.

Art

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