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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG
August 20, 2007

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PRM-50-85
(72FR37470)

DOCKETED
USNRC

August 27, 2007 (4:14pm)

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ADJUDICATIONS STAFF

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Dale E. Klein
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket No. PRM-50-85

Dear Chairman Klein:

I am writing this letter as part of your request for public comment on the petition for rulemaking, dated April 11, 2007, which was filed with the Commission by Eric Epstein. Please know that as you read this letter, not only am I a State Representative in a county with two nuclear facilities in the region, I am also the father of two young children.

Mr. Epstein's petition was docketed by the Nuclear Regulatory Commission (NRC) on April 17, 2007, and has been assigned Docket No. PRM-50-85. Mr. Epstein has requested that the NRC amend its regulations regarding emergency preparedness to require that all host school pick-up centers be at a minimum distance of five to 10 miles beyond the radiation plume exposure boundary zone. Mr. Epstein seeks this ruling to ensure all school children are protected in the event of a radiological emergency. Please know that I fully support Mr. Epstein's efforts on this matter.

These changes are requested to insure ALL school children, attending school within the established evacuation zones around any of the licensed nuclear power station located around the nation under the exclusive jurisdiction of the U.S. Nuclear Regulatory Commission, are properly protected in the event of a radiological emergency.

The current requirements, which allow host school pick-up centers to be just outside of the 10 mile radiation plume exposure boundary zone, are inadequate and fail to meet the safety needs of school children and clearly fail to meet any reasonable standard for the offsite plans to adequately protect their health and safety.

Unlike general population relocation centers which, according to NRC and DHS/FEMA regulations, are required to be at least five miles and recommended to be at least 10 miles beyond the radiation plume exposure boundary zone, host school pick-up centers are only required to be outside of the established radiation plume exposure boundary zone.

Due to inadequate guidance and regulations, many host pick-up schools are located within these boundary zones. The current evacuation scenario defeats DHS/ FEMA recommendations for minimizing radiation exposure to the public. If it is recommended for safety reasons, why not just require it?

Template = SECY-067

SECY-02

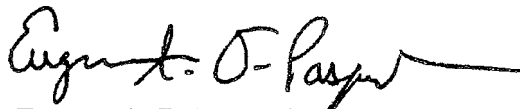
The NRC's current regulations are inadequate and contradict DHS/FEMA's recommended safeguards for mitigating radiation exposure, i.e., "Time, Distance or Shielding." No valid public objective or moral imperative exists that would keep children within a zone of exposure during a radiological emergency.

Furthermore, according to the data cited on page 17 of NRC NUREG-0654r1 it could take as little as one to four hours for the plume release to reach the 10-mile boundary line. These host school pick-up centers are where children will be waiting for parents, relatives, neighbors or family friends to pick them up during a radiological emergency. School children may be at these centers for undetermined periods of time.

Mr. Epstein's general solution to the problem of proximity of host school pick-up centers to the radiation plume exposure boundary zone is for the NRC and DHS/FEMA to clarify and codify requirements for host school pick-up centers to be located a minimum distance of at least five miles and preferably 10 miles beyond the plume exposure boundary zone.

As a Representative and a father, I strongly hope that you concur with Mr. Epstein's petition for the safety of ALL children.

Sincerely,



Eugene A. DePasquale
State Representative, 95th District

cc: Commissioner Peter B. Lyons
Commissioner Edward McGaffigan, Jr.
Commissioner Gregory B. Jaczko