

Rulemaking Comments**PRM-50-104
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From: Ellen Lebowitz [ellen@ellenlebowitz.com]
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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

It is very clear that nuclear power disasters can have sustained and far reaching effects. Of great concern is the evacuation of affected populations. In the US, emergency planning for nuclear emergencies has remained largely static since 1980, when regulations pertaining to emergency planning were initially enacted after the Three Mile Island accident. These plans are outdated and are not reasonably protective of the health and safety of United States citizens.

The current 10-mile emergency evacuation zone doesn't adequately protect from effects of ionizing radiation. The tragic experiences of Fukushima and Chernobyl are direct evidence that radiation releases from nuclear accidents can be greater than computer modeling or simulations suggest. And in fact, the accident at Fukushima resulted in sustained and large releases of radiation for a period of several weeks.

More than 150,000 people evacuated near Fukushima, from as far as 25 miles away--50,000 of those, according to the Associated Press (5/16/12) evacuated from outside the mandatory evacuation zones. Meanwhile, the U.S. Nuclear Regulatory Commission and U.S. State Department recommended that Americans within 50 miles of Fukushima evacuate. Even so, as much as 80% of the airborne radiation released at Fukushima blew directly over the Pacific Ocean, rather than populated areas. The NRC cannot rely on favorable wind patterns to protect the American public.

The National Academy of Sciences BEIR VII report, states that there is no safe dose of radiation, and women and children are affected more by radiation than men. Evacuation regulations must be protective of the most vulnerable in the population.

The ingestion pathway EPZ is also grossly inadequate, and should be expanded to 100 miles. Food contamination at both Fukushima and Chernobyl has been far reaching and persistent. In Chernobyl, radionuclides tainted crops and animal products hundreds of miles away. More than 25 years after that accident, sheep in Wales--hundreds of miles away--remain impacted. In Fukushima rice, milk, and other food has exhibited contamination more than 100 miles from the site.

Current NRC regulations do not require that emergency exercises take into consideration an initiating or concurrent natural disaster that might further complicate accidents and subsequent evacuation efforts. At Fukushima, a natural disaster (coupled with faulty reactor design) initiated the disaster. Both Fukushima and the U.S. experience with Hurricane Katrina demonstrate the difficulties associated with evacuating when a natural disaster strikes that causes roadways to wash out.

Weather patterns are growing more extreme and dangerous. In 2011, hurricanes, earthquakes, and flooding caused damage to U.S. nuclear reactors. Therefore, emergency preparedness drills and exercises should include regionally appropriate natural disasters such as droughts, flooding, blizzards, earthquakes, wildfires, and hurricanes.

I vigorously urge the NRC to adopt the proposed rule expanding emergency planning zones to the respective 25, 50, and 100 mile zones and add a new requirement that emergency exercises include scenarios of regionally appropriate initiating or concurrent natural disasters.

Thank you,

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