

**Rulemaking Comments**

**PRM-50-104  
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**From:** Jim Diamond [jimdiamond@comcast.net]  
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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Fukushima has shown us that 10 mile evacuation zones are unrealistic. Wishful thinking is an important human trait, but in dealing with nuclear power and attendant radiation hazards, intense realism is what is needed. We need realistic assessments even if they show that we are unprepared or unable to deal with possible dangers.

One rickety structure with a cooling pool on its roof is now the difference between a major economic and social disaster at Fukushima and a far more deadly and costly calamity. The regulatory regime in Japan had the same "no, not here" mind set as U.S. regulators.

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.

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 interdicted. Similarly, in Fukushima contamination of rice, milk, and other food has been exhibited 100 miles and more from the site.

I do not need to tell you the many factors which must be taken into account. But I do believe that planning and action are far more urgent than response. Please accelerate your timetable!

Also, please take into account the possibilities of terrorist activity targeting spent fuel ponds, which Fukushima has taught the world including terrorists are possible targets.

Earthquakes, tsunamis, forest fires, and all the rest, in all combinations, and "what we haven't thought of yet" are all important to consider. Please 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 concurrent natural disasters.

Thank you,

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