

Rulemaking Comments**PRM-50-104
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USNRC

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Fukushima is clear evidence that nuclear power disasters can have sustained and far reaching effects beyond those anticipated in present evacuation plans. United States' emergency planning for nuclear emergencies has not been significantly updated in decades and would not adequately protect the health and safety of residents, particularly the more vulnerable members of our population such as women, children and the elderly..

Fukushima and Chernobyl provide direct evidence that radiation releases from nuclear accidents can be much greater than that estimated by computer modeling or simulations. The U.S. Nuclear Regulatory Commission and U.S. State Department recommended that Americans within 50 miles of Fukushima evacuate, far more than the 10 miles recommended in US planning.

The National Academy of Sciences BEIR VII report recognizes that there is no safe dose of radiation, particularly for the more vulnerable. The ingestion pathway EPZ is totally inadequate, and should be expanded from the current 50 miles to at least 100 miles. In Chernobyl, radionuclides tainted crops and animal products hundreds of miles away, and more than 25 years after that disaster sheep in Wales, hundreds of miles away, -remain interdicted. In Fukushima contamination of food has been found over 100 miles from the site.

NRC regulations should also require emergency exercises that take into account natural disasters that might complicate accidents and evacuation efforts. 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. As climate change increases, it is vital that emergency planning and drills address potential natural disasters as initiating and/or complicating both nuclear incidents and evacuation procedures.

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

Thank you,

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