

Rulemaking Comments

**PRM-50-104
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From: David Givers [dgivers@gomoorhead.com]
Sent: Wednesday, May 16, 2012 9:03 PM
To: Rulemaking Comments
Subject: Comments on PRM-50-104, Docket ID NRC-2012-0046

May 23, 2012 (11:45 am)
**OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**

I am pleased that the NRC has issued this Petition for Rule Making to expand Emergency Planning Zones.

Experience from Fukushima, Chernobyl and Three Mile Island teaches us that the current rules are antiquated and do not address the real dangers. During the Fukushima nuclear power disaster, the US State Department warned US citizens within 50 miles to evacuate. We need to bring that experience home and apply it here.

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

The current ingestion pathway EPZ rules are also grossly inadequate, so should be expanded to 100 miles. Again, we have experience and data of food contamination at both Fukushima and Chernobyl showing we need to rewrite the current rules. Chernobyl, radionuclides tainted crops and animal products hundreds of miles away and the hazard still exists 25 years later. In Fukushima contamination of rice, milk, and other food has been exhibited 100 miles and more 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. 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.

It is for all these reasons that I request that the NRC 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 initiating or concurrent natural disasters.

Thank you,

David Givers

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