

Rulemaking Comments**PRM-50-104
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From: Dolores Taller [dtaller@igc.org]
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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The events at Fukushima clearly show that nuclear power disasters can have sustained and far reaching effects. The evacuation of affected population is a major concern associated with Fukushima and other nuclear disasters. However in the United States, emergency planning for nuclear emergencies has not changed since 1980, when regulations for emergency planning were created after the Three Mile Island accident. These plans are outdated and need to be revised using the real world experiences at Fukushima and Chernobyl, to protect the health and safety of United States citizens.

The experiences of Fukushima and Chernobyl show that the current 10-mile emergency evacuation zone does not adequately protect from the effects of ionizing radiation, despite what computer modeling and simulations may demonstrate. The real world experiences of are direct evidence that radiation releases from nuclear accidents can be greater than computer modeling or simulations suggest. The accident at Fukushima resulted in sustained and large releases of radiation for a period of several weeks.

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 I urge that emergency preparedness drills and exercises should include regionally appropriate natural disasters such as droughts, flooding, blizzards, earthquakes, wildfires, and hurricanes.

For these reason 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 regionally appropriate initiating or concurrent natural disasters.

Thank you,

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