

**Rulemaking Comments****PRM-50-104  
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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

I am deeply concerned about the continuing operation of decades old nuclear facilities in the U.S., such as the Indian Point Nuclear Facility in Westchester NY [where I reside]. Indian Point is a classic example of a facility that leaks radioactive material into the river, sits near a fault, is an easy terrorist target and leaves absolutely no viable means of escape/evacuation for the people in Westchester County.

The Fukushima disaster has caused the oceans to be contaminated with billions of tons of radioactive material, the entire planet to be subjected to unknown amounts of radioactive fallout and millions of people in Japan to be exposed to cancer causing levels of radioactivity. The damage was certainly not limited to a 10 mile zone.

While Japan has closed down the last of it's 50 reactors and Germany is in the process of closing down their nuclear facilities, the U.S. not only plans to build new facilities, but has left our emergency planning for nuclear emergencies unchanged since 1980. Current evacuation plans are outdated and do not adequately protect the health and safety of the people.

Our decades old facilities pose a threat to communities all over the country, and I am baffled and deeply troubled by the NRC's rubber stamping of the continuing operation and applications for relicensing of these dangerous places.

The current 10-mile emergency evacuation zone is really a joke. In actuality, even a 50 mile zone is insufficient. The accident at Fukushima resulted in sustained, large releases of radiation for a period of several weeks, with great intensity over an area of more than 50 miles, and with mild intensity over the entire planet.

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. About 80% of the airborne radiation released at Fukushima blew directly over the Pacific Ocean, rather than populated areas. The long term effects of that fallout are difficult to know, but I believe that it is no longer safe to eat Pacific fish as a result of the fallout and dumping of contaminated water.

The NRC cannot rely on favorable wind patterns to protect the American public.

According to the National Academy of Sciences BEIR VII report, 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 interdicted.

Similarly, 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. At Fukushima, a natural disaster (coupled with faulty reactor design) initiated the disaster. The U.S. experience with Hurricane Katrina demonstrates the difficulties associated with evacuating when a natural disaster strikes. One shudders to think of what could happen in the wake of a terrorist strike, earthquake, tornado or other natural or unnatural disaster close to one of our nuclear facilities.

As world weather patterns grow more extreme and dangerous, emergency preparedness drills and exercises should consider regionally appropriate natural disasters such as droughts, flooding, blizzards, earthquakes, wildfires, and hurricanes, as well as the possibility of terrorist attack.

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 regionally appropriate initiating or concurrent natural disasters.

Thank you,

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