

**Rulemaking Comments**

**PRM-50-104  
(77FR25375)**

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**From:** Marvin Lewis [marvlewis@cavtel.net]  
**Sent:** Tuesday, June 05, 2012 11:06 AM  
**To:** Rulemaking Comments  
**Subject:** Comments on PRM-50-104, Docket ID NRC-2012-0046

June 5, 2012 (1:10 pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

From:Marvin I. Lewis  
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To: Nuclear Regulatory Commission

Re: Extension of Comments by Marvin Lewis

In the matter of: Extension of EPZ

**Background:**

Commenter has submitted comments previously. The following comments extends those previous comments. I again state that I agree with the comments of NIRS. The following comments are added and new material.

**Comments:**

Although most technical issues have been touched upon in the comments and reports that have issued, these technical issues have not been addressed adequately to assure that all exigencies will be adequately resolved.Despite the earthquake and sunami at Fukushima, how a 100' sunami and and a 9.0 earthquake will impact nuclear reactors on the East and West USA coasts is ignored.

The East Coast 100' sunami has been a matter of geological speculation since the undersea cliff below La Palmas wa discovered ready to fall back in the 40s, and the West Coast sunami has been conjectured by geologists since the geology of the British Columbia, Washington State , Oregon coast mirrors that of Japan around Fukushima. I suggest that we are past ignoring geology.

These are not the only omissions in the staff's reports.

Zirconium alloy can be flammable and explosive. So far the conditions for zircolloy to burn or explode have not been met at any accident site. Let's keep it that way.

Middle America is also prone to earthquakes as has been seen in Virginia. I would like to see this addressed in reports.

Another issue that the Staff has ignored is the issue of finances. The US did a sorry job of storing the humanity that could not get out of Katrina's way. The stadium where the non-emigre's were housed suffered a roof collapse.

In the case of storage will there be sufficient monies immediately available to perform as imagined in the many reports ,especially the Waste Confidence Draft Report? Some of these proposed on-site storage sites will be in communities which have volunteer fire departments and few emergency vehicles.

To go to the area of finances: Bernanke, Geithner et al have a penchant to send our monies to Europe. Estimates of 40+ trillion dollars have been sent to Europe without Congressional preview (Solari.com 3/2/12). I am skeptical that a drain of this sort can be maintained without some repercussions. I would like to see some check to assure that sufficient funding will be available for an accident. I do not accept a finding of "reasonable assurance" 5 times in the Waste Confidence Decision (75FR81032 and 81037) unless we can pay for accidents.

Reservation:

I reserve my right to submit further comments when new material issues.

Respectfully submittes,

Marvin Lewis

6/5/2012.

The on-going events at Fukushima demonstrate that nuclear power disasters can have sustained and far reaching effects. A major concern associated with Fukushima and other nuclear disasters is the evacuation of affected populations. In the United States, emergency planning for nuclear emergencies has remained largely static since 1980, when regulations pertaining to emergency planning were initially enacted after the Three Mile Island accident. These plans are outdated and do not adequately protect the health and safety of United States citizens.

Specifically, 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 Fukushima and Chernobyl are direct evidence that radiation releases from nuclear accidents can be greater than computer modeling or simulations suggest. Indeed, the accident at Fukushima resulted in sustained and large releases of radiation for a period of several weeks.

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. Even so, as much as 80% of the airborne radiation released at Fukushima blew directly over the Pacific Ocean, rather than populated areas. 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. 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. As such, emergency preparedness drills and exercises should include regionally appropriate natural disasters such as droughts, flooding, blizzards, earthquakes, wildfires, and hurricanes.

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,

Marvin Lewis

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