

**Rulemaking Comments**

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**From:** Steve Garvin [sgarvin@docogonet.com] July 16, 2012 (11:35 am)  
**Sent:** Monday, July 16, 2012 11:32 AM  
**To:** Rulemaking Comments OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF  
**Cc:** Woods, Rick R; Steve Garvin  
**Subject:** Comments on Docket ID NRC-2012-0046  
**Attachments:** DORCHESTER COUNTY COMMENTS 7-13-12 ON NUCLEAR REGULATORY  
COMMISSION DOCKET NUMBER NRC.doc

To Whom it May Concern;

I am submitting comments on Docket ID NRC-2012-0046, as a concerning County, in Maryland that is in the Calvert Nuclear Power Plant 10 Mile Emergency Planning Zone (EPZ). The comments state our concerns, however could be concerns of others that fall in a 10 Mile EPZ anywhere in the Country.

Please see the attached comments from Dorchester County, Maryland. If you have any questions please let me know.

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DORCHESTER COUNTY, MARYLAND COMMENTS ON NUCLEAR REGULATORY  
COMMISSION DOCKET NUMBER NRC-2012-0046

DOCKET NAME: PETITION FOR RULMAKING SUMITTED BY NUCLEAR INFORMAITON  
AND RESOURCE SERVICE AND MULTIPLE CO-PETITIONERS – EXPANSION OF  
EMERGENCY PLANNING ZONE

COMMENTS CLOSE: 07/16/2012

The Docket requests the NRC to amend its regulations to expand the Emergency Planning Zones (EPZs) for Nuclear Power Plants from 10 miles to 25 miles. The Petitioner and 37 Co-Petitioners are described as “environmental and civic organizations with members who live within 100 miles of U.S. Nuclear Power Plants and who are concerned that current NRC emergency planning requirements are not adequate to protect their health and safety in the event of an accident at the plant. The Petitioners also state that the expansion of the EPZ from 10 mile radius to a 25 mile radius “would provide no new requirements other than expansion of the EPZ.”

The County of Dorchester, Maryland is located on the Eastern Shore of Maryland with a population of approximately 32,000 of which under the 10 mile EPZ has around 352 residents that live in the current EPZ. Based on the Petitioners statement of “would provide no new requirements other than expansion of the EPZ”, shows that a full impact study was not conducted. Below are comments and concerns of Dorchester County and prepared by Emergency Management. These comments reflect the impact for Dorchester County, however if applied to all current EPZ’s would reflect a much larger impact nationally, not only for local and State agencies, but also the Utility.

Comments

1. With the expansion of the EPZ from 10 miles to 25 miles would increase the area of concern from Taylor’s Island (population of approximately 352 residents) to an area covering most of Southern Dorchester up to and including Cambridge (population of approximately 15,000 residents).
2. The current evacuation routes and Estimated Time of Evacuation (ETE) would require review and changed to accommodate the increase in population.
3. The current reception center and shelter would have to be moved to another area of the county or even outside of the county.
4. The purchase of a second or third Portal Monitor (Radiation Detector) would be required to accommodate the additional residents and vehicles.
5. Additional staffing would be required to handle traffic control; road closures, etc. This would have a significant impact on current resources (DSO; MSP; CPD; County and State Roads).

6. Additional staffing would be required at both the reception center and shelter, which would be a significant impact to the Health Department; Social Services and Red Cross.
7. The current Siren system utilized by Calvert Cliffs Nuclear Power Plant would have to be expanded to cover the areas of Dorchester County that will be added to the EPZ. This will be very costly to do and could cost in excess of \$3M.
8. Currently being in the 10 mile EPZ does not have any impact on Dorchester General Hospital, State Hospital, Nursing Homes, Detention Center, Schools and Day Care Centers. If the EPZ is expanded to a 25 mile radius, it will have an impact on all those mentioned.
9. Based on population increase additional KI would be required, which would be a significant cost. The KI would need to be prepositioned at schools and it will also require additional staffing which is not available to distribute in a short period of time.

This increase of the EPZ would have a major impact on the financial well being of the County, due to the fact that the area is in a depressed state, due to the present economy.

In closing Dorchester County, Maryland recommends that the NRC deny Petition PRM-50-104 Docket NRC-2012-0046, because the Petitioners have not provided an adequate justification for modifying the Commission's regulations and have not provided a financial impact for County and State agencies that would be financially and resource burdened by the increase of the EPZ's