

**Rulemaking Comments****PRM-50-104  
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**From:** Lydia Gralla [lgralla@aol.com]  
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July 17, 2012 (1:35 pm)  
OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

At the time of the Fukushima nuclear power plant disaster I was reminded of the many demonstrations my husband and I attended regarding our fears over the lack of safety of nuclear power plants here in the US. Like most other Americans we are aware of the recent reports regarding the cause of the Fukushima disaster. It is appalling to learn of the irresponsibility of the Japanese government- shocking to learn of it's immoral disinterest in the safety of it's population. These current reports 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 1980s. These plans are outdated and do not adequately protect the health and safety of United States citizens.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.

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,

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