

Rulemaking Comments**PRM-50-104
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From: Lissa Weinmann [lrweinmann@gmail.com]
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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

July 16, 2012

Lissa Weinmann
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I live within the emergency planning zone for the Vermont Yankee reactor, the second oldest continuously operating reactor in the nation of Mark 1 design. Our state wants this reactor closed as it's leaking tritium and other compounds into the ground, has had numerous, almost weekly, problems and the grossly, shockingly overcrowded spent fuel pool poses a catastrophic threat to a larger much bigger than a 10-mile zone should a tornado, earthquake or other act of nature or terrorism occur.

I want our evacuation zone expanded to reflect the serious threat we face everyday. I want my friends who live 20 miles from the plant to be included in planning. I want potassium iodide readily available for all who need it. This is not the case today and it must change.

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 These plans are outdated and do not adequately protect the health and safety of United States citizens. Indian Point near the largest population center in the nation and considered one of the riskiest reactors due to earthquake threat doesn't even have an evacuation plan. This is unthinkable.

The current 10-mile emergency evacuation zone does not adequately protect from the effects of ionizing radiation. 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.

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

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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.

Also, I understand that a life lost in a nuclear incident is worth about 1/3 the value of a life in other disasters. Why is my life or the life of my child worth less in the event of nuclear disaster? This disgraceful discrepancy must be eliminated.

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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