

**Rulemaking Comments**

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

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**From:** Carol Letson [cletson@crocker.com]  
**Sent:** Monday, July 16, 2012 5:04 PM  
**To:** Rulemaking Comments  
**Subject:** Comments on PRM-50-104, Docket ID NRC-2012-0046

July 17, 2012 (1:35 pm)  
OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

I call on the NRC to expand emergency planning zones to the respective 25, 50, and 100 mile zones 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 These plans are outdated and do not adequately protect the health and safety of United States citizens.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.

The ingestion pathway EPZ is also grossly inadequate, and should be expanded to 100 miles. In Chernobyl, radionuclides tainted crops and animal products hundreds of miles away. Similarly, in Fukushima contamination of rice, milk, and other food has been exhibited 100 miles and more from the site.

Take into account concurrent natural disasters. 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.

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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