

Rulemaking Comments**PRM-50-104
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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Nuclear energy disasters should not necessarily include serious collateral damage to humans and animals as part of a gratis, nuclear modus operandi. We do not need to wait until a 'Fukushima' occurs in the U.S. to legislate appropriate evacuation and exclusion zones. 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 and need to be considered in our emergency plans. Indeed, the accident at Fukushima resulted in large plumes of radiation that were sustained for several weeks, along with continuing steam releases from underground fuel meltdowns causing gases to surface and remaining common/spent fuel pool vulnerability to further earthquakes and building collapse.

More than 150,000 people evacuated near Fukushima, from as far as 25 miles away, including 50,000 of those who moved beyond 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. It turns out that 80% of the airborne radiation released at Fukushima blew directly over the Pacific Ocean, rather than populated areas! The NRC cannot rely on tiny, rigid evacuation zones around nuclear plants or 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

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or concurrent natural disasters. There is no reason to delay this expansion of nuclear emergency plans when we know, full well, it's not a matter of 'if,' it's a matter of 'when' it will happen in the U.S., to any one of roughly 53-56 nuclear reactors, some with the BWR type design.

Thank you for your consideration of this issue and actions taken to safeguard the American public from nuclear disasters.

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