

July 19, 2012 (1:45 pm)

Water, Roots and Branches Affinity Group  
Wendell, MA  
01379

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC  
20555-0001

285

July 12, 2012

**ATTN: Rulemakings and Adjudications Staff**

**Re: Docket ID NRC-2012-0046, Petition PRM-50-104**

Dear Staff,

We are writing as members of the Water, Roots and Branches affinity group based in Wendell, Massachusetts. Our town is located approximately 16 miles from the Vermont Yankee nuclear plant, just outside the current 10 mile evacuation zone limit. Our group has been actively involved in the movement to have this aging reactor permanently closed and the site cleaned up.

Even if the plant were to be closed tomorrow, the cleanup effort would take many years, and there still remains the problem of the many hundreds of tons of nuclear waste being temporarily stored at the site. Given that no long term storage solution currently exists, it is not unreasonable to suggest that Vermont Yankee will pose a threat to the citizens of Wendell for the rest of our lives.

Experience at Fukushima and Chernobyl has shown that the current NRC evacuation zone guidelines are out of step with the realities of a serious accident at a nuclear plant. It is only prudent to ensure that planning for an emergency, however unlikely, takes this into account. We urge the commission to extend the emergency planning zone around nuclear plants to 25 miles, and the Ingestion Pathway Zone to 100 miles.

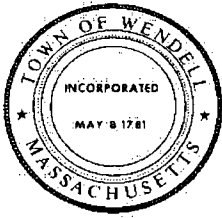
This issue was brought to our annual town meeting on June 4, 2012 in the form of a resolution supporting the Petition before you. Attached is a certified copy of the results of that vote from our Town Clerk. Note that the citizens of Wendell voted unanimously in support of the resolution and PRM-50-104.

Respectfully submitted,

Alistair MacMartin  
Judy Hall  
Rai Grigonas

Margo Culley  
Shelley Hines

Peter Gallant  
Pam Richardson



Town Clerk's  
Office

Town of Wendell  
Massachusetts

June 27, 2012

To Whom It May Concern:

In the name of the Commonwealth of Massachusetts, the citizens of Wendell, qualified to vote in elections and in Town affairs, met at the Town Hall on Monday, June 4 of this year and voted on the following article that I, the elected Town Clerk of said town, have been directed to bring to your attention.

**ARTICLE 27:** To see if the Town will vote to adopt the following resolution or take any action thereon:

Whereas the March 2011 nuclear accident at Fukushima resulted in a mandatory evacuation of a 12 mile radius around the Fukushima Daiichi nuclear site, a recommended evacuation of an 18-mile radius, and actual evacuation of villages 25 miles away to the northwest of Fukushima Daiichi;

Whereas the April 1986 Chernobyl nuclear accident resulted in creation of a permanent 18-mile exclusion zone around the Chernobyl nuclear site and actual evacuation of villages 100 miles and more away;

Whereas the March 2011 nuclear accident at Fukushima resulted in numerous documented instances of interdiction of contaminated food and livestock 100 miles and more from the Fukushima Daiichi site and widespread contamination of crops and other vegetation;

Whereas the April 1986 Chernobyl nuclear accident resulted in interdiction of contaminated food and livestock hundreds of miles from the Chernobyl site (including continued interdiction of contaminated livestock in Wales—approximately 1,000 miles away) and widespread contamination of crops and other vegetation;

Whereas current U.S. Nuclear Regulatory Commission regulations establish a 10-mile Emergency Planning Zone for evacuations around U.S. nuclear reactors and a 50-mile Ingestion Pathway Zone to monitor and potentially interdict contaminated food, water, milk and livestock;

Whereas, based on the real-world experience of the Fukushima and Chernobyl nuclear accidents, the 10 mile Emergency Planning Zone and 50 mile Ingestion Pathway zones are inadequate and outdated;

Whereas the Fukushima nuclear accident was caused by an earthquake and ensuing tsunami, which knocked out critical offsite and onsite power sources, demonstrating that natural disasters can initiate severe nuclear accidents;

Whereas the August 2011 mid-Atlantic earthquake resulted in a ground speed motion double that which the nearby North Anna nuclear complex was designed to withstand, and knocked out offsite power to the site;

Whereas tornadoes, hurricanes and floods during 2011 caused loss of offsite power and other damage to several nuclear reactor sites across the U.S., including Browns Ferry in Alabama, Surry in Virginia, Calvert Cliffs in Maryland and Fort Calhoun in Nebraska, demonstrating that natural disasters can challenge nuclear safety systems;

Whereas current Nuclear Regulatory Commission regulations do not require bi-annual emergency exercises to include scenarios of regionally-appropriate initiating or concurrent natural disasters;

Whereas the citizens of THE TOWN OF WENDELL deserve the greatest possible protection from nuclear power accidents and the greatest possible preparation to mitigate the effects of nuclear accidents;

Whereas current Nuclear Regulatory Commission emergency planning regulations are inadequate to provide a sufficient level of protection for the citizens of THE TOWN OF WENDELL;

BE IT RESOLVED THAT THE TOWN OF WENDELL Supports the expansion of current Emergency Planning zones from 10 to 25 miles around U.S. nuclear reactor sites;

Supports the creation of a new Emergency Response Zone of 25 to 50 miles around U.S. nuclear reactor sites that would require nuclear power utilities to identify evacuation routes and provide this information to the public within this zone;

Supports the expansion of the Ingestion Pathway Zone from 50 miles to 100 miles around U.S. nuclear reactor sites;

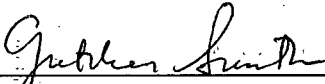
Supports emergency evacuation exercises that practice response to situations involving regionally appropriate initiating or concurrent natural disasters;

Supports the Petition for Rulemaking submitted by 38 organizations across the United States on February 15, 2012, since endorsed by more than 2700 organizations and individuals, and docketed by the Nuclear Regulatory Commission as PRM-50-104, which would make the necessary changes to emergency regulations detailed above;

Be it further resolved that THE TOWN OF WENDELL will send a copy of this approved resolution to our state and federal elected officials and call on them to also support PRM-50-104. In addition, THE TOWN OF WENDELL will inform the Secretary of the Nuclear Regulatory Commission and the appointed Nuclear Regulatory Commissioners of its support for PRM-50-104.

**MOTION: So Moved, 2<sup>nd</sup>, passed unanimously.**

**I hereby certify that this document is a true copy of the votes taken at the Annual Town Meeting held at the Town Hall in the Town of Wendell on June 4, 2012.**

  
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**Gretchen C. Smith**  
**Town Clerk**