AP1000DCDCEm Resource

From: David Barouh [dbarouh@fastmail.fm]
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Subject: Comments on PRM-50-104, Docket ID NRC-2012-0046

The Fukushima disaster demonstrates that nuclear accidents happen, and are catastrophic like no other. Planning for nuclear emergencies has remained largely static in the US since 1980, and are inadequate and outdated.

The current 10-mile emergency evacuation zone does not adequately protect from the effects of ionizing radiation, computer modeling and simulations notwithstanding. The real world experiences of Fukushima and Chernobyl are direct evidence of that. Indeed, the Fukushima accident resulted in sustained and large releases of radiation for 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) from outside the mandatory evacuation zones. The U.S. Nuclear Regulatory Commission and U.S. State Department advised Americans within 50 miles of Fukushima to evacuate. Fortunately, as much as 80% of the airborne radiation blew directly over the Pacific Ocean. The NRC must not 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 those most vulnerable.

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, contamination of rice, milk, and other food has been exhibited 100 miles and more from Fukushima.

Current NRC regulations do not require that emergency exercises consisder an initiating or concurrent natural disaster, as happened at Fukushima (coupled with faulty reactor design). Both Fukushima and Hurricane Katrina demonstrate the difficulties associated with evacuating in such cases.

Weather patterns are growing more extreme and dangerous. In 2011, hurricanes, earthquakes, and flooding caused damage to U.S. nuclear reactors. Emergency preparedness drills and exercises must include natural disasters.

For all these reasons, the NRC must adopt the proposed rule expanding emergency planning zones to the respective 25, 50, and 100 miles and add a new requirement that emergency exercises include scenarios of regionally appropriate intiating or concurrent natural disasters.

Thank you,

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