

AP1000DCDCEm Resource

From: Evan and Elaine Hazard [eehazard@paulbunyan.net]
Sent: Wednesday, May 16, 2012 4:55 PM
To: Rulemaking Comments
Subject: Comments on PRM-50-104, Docket ID NRC-2012-0046

The continuing events at Fukushima show that nuclear power disasters can have sustained and far reaching effects. A major concern associated with Fukushima and other nuclear disasters is the evacuation of affected populations. In this country, emergency planning for nuclear emergencies has remained largely static since 1980, when regulations pertaining to emergency planning were first enacted after Three Mile Island. These plans are outdated and do not adequately protect the health and safety of Americans.

1. The current 10-mile evacuation zone does not adequately protect from the effects of ionizing radiation, despite what computer modeling and simulations may demonstrate. Real world experiences at Fukushima and Chernobyl show 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.

2. Over 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.N.R.C. and 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.

3. Per the NAS BEIR VII report, there is no safe dose of radiation, and radiation affects women and children more than it does men. Evacuation regulations must protect the most vulnerable in the population.

4. 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. Over 25 years after that accident, sheep in Wales--hundreds of miles away--remain affected. Similarly, in Fukushima contamination of rice, milk, and other food has been exhibited 100 miles and more from the site.

5. Current NRC regs 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.

6. 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.

For all these reasons, I ask 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,

Evan and Elaine Hazard

Bemidji, MN 56601
US

Federal Register Notice: 72FR25375, PRM-50-104
Comment Number: 184

Mail Envelope Properties (1070075342.1337201681312.JavaMail.tomcat)

Subject: Comments on PRM-50-104, Docket ID NRC-2012-0046
Sent Date: 5/16/2012 4:54:41 PM
Received Date: 5/16/2012 4:52:49 PM
From: Evan and Elaine Hazard

Created By: eehazard@paulbunyan.net

Recipients:
"Rulemaking Comments" <Rulemaking.Comments@nrc.gov>
Tracking Status: None

Post Office: vweb17.salsalabs.net

| Files | Size | Date & Time |
|--------------|-------------|------------------------|
| MESSAGE | 3396 | 5/16/2012 4:52:49 PM |

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: