

AP1000DCDCEm Resource

From: Judy Nakadegawa [jnakadegawa@yahoo.com]
Sent: Monday, June 11, 2012 11:50 PM
To: Rulemaking Comments
Subject: Comments on PRM-50-104, Docket ID NRC-2012-0046

The on-going events at Fukushima demonstrate 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.

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.

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.

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.

And, how will evacuation actually happen? Will the roads be so clogged that traffic will come to a standstill? What about those without their own transportation?

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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Federal Register Notice: 72FR25375, PRM-50-104
Comment Number: 1444

Mail Envelope Properties (118306337.1339472986736.JavaMail.tomcat)

Subject: Comments on PRM-50-104, Docket ID NRC-2012-0046
Sent Date: 6/11/2012 11:49:46 PM
Received Date: 6/11/2012 11:49:47 PM
From: Judy Nakadegawa

Created By: jnakadegawa@yahoo.com

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

Post Office: vweb50.salsalabs.net

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