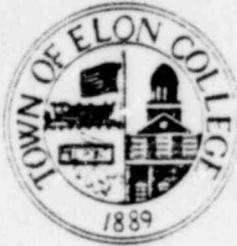


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TOWN OF ELON COLLEGE

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CHIEF OF POLICE
HENRY F. HILLIARD

BUCKET NUMBER 53
PROPOSED RULE PR-50 (44 FR 41483)

Nuclear Regulatory Commission
Washington, D. C. 20555

27 August 1979

To the NRC:

I am writing to comment on what should be included in rules concerning increased emergency readiness by both the licensee and the State and local authorities for the protection of those living near nuclear power plants. As the Shearon Harris nuclear plant is being built 40 miles southeast of us, this is a particularly important issue.

The basic objectives of emergency planning should include preventing exposure, reducing exposure, and evacuating the public if necessary. Preventing exposure is the most important thing in the event of off-site leakage.

An effective emergency response plan should include the following:

- 1) The licensee should have total responsibility for notifying state officials of any off-site leakage as soon as it happens, without delay.
- 2) The licensee should have the ability to evacuate the public within a 5-10 mile radius of the site of the leakage.
- 3) The State should have ways to reach everyone on a twenty-four hour basis. Some official in each locality should specifically be on call 24 hours to respond and alert the proper local officials and the public.
- 4) Stockpiles of potassium iodide foods that will retard radiation should be kept on hand at the local level.
- 5) The Evacuation Plan itself should include:

a) a designated place to evacuate the public to, which

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1087 153
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POOR ORIGINAL

Nuclear Regulatory Commission
Page Two

- is away from the direction of the plume coming from the plant
- b) there should be an alternate evacuation site designated ahead of time
 - c) both the primary and alternate evacuation sites should be at least 30 miles from the locality itself, and at least 50 miles from the plant site
 - d) the Fire Department, with the help of volunteers, in each locality, ought to be primarily responsible for evacuation
 - e) the Police Department in each locality probably should be left behind to guard against looters
 - f) the transportation necessary to evacuate the public should be checked out in advance so that citizens have access to transportation when it is needed, and include school busses, trucks from local firms, etc.
 - g) provisions should be made for emergency water, food, and first aid at the evacuation site
 - h) at least 5 persons in every locality should have medical training in treating both individuals for radiation exposure and in dealing with the whole community, especially to prevent panic
- 6) The State role in emergency planning will be larger at night, to make sure that police keep highways open, and that communications lines are kept open. It should be noted that some large cities, like Burlington, probably cannot be evacuated, but smaller cities and towns like Elon College can.

The State should co-ordinate the immediate evacuation of those in the outlying areas of the affected zone so that those moving from localities nearer the plant will not be held up by people in the perimeter areas who might be blocking exit routes if they are not evacuated in a smooth manner first.

The State should send its own communications team to the nuclear power plant as soon as they know there has been an accident. Permanently redundant phone lines should be maintained by the State, especially within 50 miles of the plant.

- 7) There should be at least one full-scale evacuation test of the emergency plan, of at least several communities.

1087 154

POOR ORIGINAL

Nuclear Regulatory Commission
Page Three

- 8) Financial assistance definitely should be provided to State and local governments for emergency response planning and preparedness. In addition to such funding, there should also be a crew of government experts, people who are experienced in disaster relief (military transportation planners, Red Cross, etc.) and in moving large numbers of people, to assist and train local officials in emergency preparedness and evacuating the public in the event of a nuclear accident.
- 9) In case the evacuation plan cannot or is not put into effect in time, emergency planning should include ways to get people under cover and fed in the event they cannot be evacuated safely. About the only way to reduce the public exposure is to have the State or federal government responsible for sending in an Army team (perhaps from Ft. Bragg for Shearon Harris, since its only an hour away by car), well-shielded and protected from the leaking radioactive material, to go in and spray the source of the off-site leakage, as it comes out of the plant.
- 10) The Evacuation Plan should be published in newspapers, once it is adopted; there should be public hearings in every locality to involve the public in adopting the plan and to ensure the plan's adequacy, and, special provisions should be made to evacuate institutions such as schools, hospitals, and prisons.
- 11) In each locality, there should be stockpiled emergency plastic radiation protection outfits (e.g., nucle-Clean), at least 2 outfits per person, for emergency workers such as firemen and policemen. Breathing masks also should be provided. Emergency filters for gymnasiums and armories where large numbers of people may be lodged, should be ready and available for use. Safe water for those in such temporary shelters also should be set aside.
- 12) 90% of the funding for emergency evacuation planning, equipment and testing, should be borne by the licensee and the federal government, and 10% should be borne by the localities within 50 miles of the plant sites.
- 13) Emergency drills should be required because otherwise there is no way of knowing whether the evacuation plan adopted will really work in an actual off-site leakage situation, where many human lives may be at stake.

Sincerely,

TOWN OF ELON COLLEGE

Lew Church

Lew Church

1087 155