

Citrus County

Department of Disaster Preparedness



GEORGE J. ALLEN, DIRECTOR

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July 24, 1979

Secretary of the Commission  
Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, D. C. 20555

Dear Sir:

Reference: Nuclear Regulatory Commission Docket Number PRM-50-23, Subject: Critical Mass Energy Project, et al; Filing of Petition for Rule Making.

Comments are hereby submitted concerning the petition for rule making. Comments are keyed to paragraph numbers as published in Federal Register, Volume 44, number 110, June 6, 1979, with general comments in summary following these keyed comments.

1. Coordinated Offsite Emergency Response Plan.

Proposing that the utility be responsible to develop a detailed offsite response plan under a proposed rule, that would have the force of law from the national level, would be in conflict with the autonomy of home rule. The County and State should be in partnership in the development of such a plan, with advice, assistance and coordination from the utility and the Nuclear Regulatory Commission.

This rules doe not improve radiation protection. It refers to a 50 mile radius and is not related to projected does rates. I would think the \$4.8 million in property taxes by our local utility entitles it to the governmental services of the Department of Disaster Preparedness. The NRC has supported this view by stating that planning and equipment requirements to mitigate any hazard should be paid for from a portion of these taxes prior to their use for other purposes. The requirement for the utility to reimburse the governmental entity for public expenses in formulating the emergency response plan, in addition to property taxes, would very likely cause the utility to file suit for double taxation.

2. Test of Plan.

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An evacuation drill, containing a diverse and significant population, to be evacuated to a distance of a least 30 miles, at least once a year, is not realistic. A check of the safety record of the 72 nuclear plants would substantiate the hazards of evacuations are a greater probability than the hazard from the nuclear plant. It is difficult to evacuate all of the population of an area for a real emergency, where we have the authority for compulsory evacuation. In a drill, where you lack this type of authority, I believe it would not be practical. Again, the cost of conducting offsite tests being placed on the utility is matter for consideration and perhaps for our courts to decide.

### 3. Offsite Radiological Monitoring.

It appears that the Public Interest Research Group is playing with words and half truths about offsite radiological monitoring. I feel the extent of the monitoring stated is greater than needed or required. It is true that many local governments need better radiological instruments to measure low level radiation. However, to say that the utility should assume all costs and to imply there is no system of offsite radiation detectors is incorrect. The utility is currently paying the cost of offsite radiological monitoring in cooperation with the Florida's Department of Health and Rehabilitative Services. Based on discussions with NRC, State and the utility, funds are included in this department's budget request for adequate low level radiological monitoring equipment. Tactical communications equipment recommended in the NRC report dated March 30, 1979, necessary to report radiation intensity to the Emergency Operating Center have also been included in the budget request. I feel that the local government's independent capability, working in partnership with the utility and State, will insure keeping us all honest through a series of checks and double checks.

### 4. Public Notice and Hearings.

The requirement for the utility to distribute to every residence (with sufficient copies for each person), business, school and other institution within 50 miles of the facility voluminous information is not reasonable. This information is available in the local library in Crystal River. The interested public may review it and submit their suggestions to the utility, county or state.

### 5. Consideration of Emergency Protection in Licensing and Siting.

The 50 mile radius is an arbitrary figure without consideration for individual design of the particular nuclear plant. The requirement that no construction permit be issued until a coordinated offsite emergency response plan has been formulated, tested and demonstrated to be effective is unreasonable. Maintenance of communications systems, retention of trained personnel, maintenance of low level radiological instruments and evacuation of personnel to a distance of at least 30 miles, with the 5-10 years before the nuclear plant would become operational, places a unreasonable financial burden on the utility.

6. Emergency Response Plans for Existing Reactors and Interim NRC Safety Action.

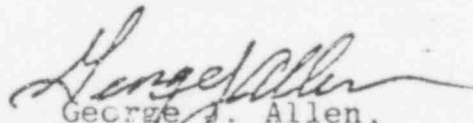
With the many factors, variables, and coordination to be considered if planning is extended to the 50 miles radius it would be difficult to complete the planning within six months. Directors in local government have many other assigned tasks to perform. If this rule is approved it would justify a new position to coordinate and develop the plans. Based on the property tax being received by the county in which the nuclear plant is located, this coordinator should perhaps do the entire plan for several local governments (counties). The proposed evacuation drill would not be recommended for the reasons previously stated.

In summary in regards to the Three Mile Island, it was not 30 minutes after an emergency was taking place but a couple days before the accidental radiation release took place. A small number of the workers were exposed to low level radiation in the 80-90 MRAD range. Students taking the Radiological Monitoring Course can be exposed to this intensity as long as it is less than 100 MRAD in the taking of this training. I believe Federal agencies flooded to TMI, were erroneous in their evacuation instructions, created problems for locals and state in the execution of their plans, and have a history of trying to enforce draft regulations on the basis that it is an accepted document.

I urge you to take a careful look at the motives of the Public Interest Research Group in requesting the rules be adopted. These actions should not be taken under the guise of public protection when it is an ulterior motive. The cost of the drill evacuations, planning, monitoring, distribution of documents, and the half truths are for the purpose of doing away with an energy source our nation direly needs. Our utility has provided me with copies of their plan, made documents available through the public library system and provided offsite monitoring to check plant emissions.

I am surprised the Public Interest Research Group did not suggest that each Florida Welcome Station and stewardess on each airline present each tourist with the voluminous information referred to in paragraph 4. During a recent demonstration against nuclear power the majority of the small group were not from the local area. In fact, some of those attending stated they were paid to visit Crystal River and attend the protest rally. I think it is time that those who know of the safety record of nuclear power, support its development, and believe it to be a good source of energy for the future, to stand up and voice their support.

Sincerely,

  
George J. Allen,  
Director