

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



Gentlemen,

Page 4 of the July 20, 1979 issue of News Release contained a request for comments regarding additional regulations on emergency plans. My comments focus on questions 1 and 2. If questions 1 and 2 cannot be answered then the others might as well be disregarded.

Six years ago, I worked as a consultant for a utility on the siting of a nuclear plant. - My role was preparing demographic projections and land use studies. I testified before the then AEC about our work.

While engaged in that work, I could not help noticing the evacuation plan being designed for that proposed facility. What I heard and saw was sadly deficient. Only the most rudimentary transportation data had been developed. Some of the data were out-of-date, some had been misinterpreted. I recall my consternation at noting the fact that the "analyst" had traffic going on to a limited access road in the wrong directions, he was using a 1954 USGS map for field work because it was laminated. When I mentioned mathematically simulating evacuations, including allowances for traffic accidents, the person designing the so-called "plan" thought I was crazy. He didn't know how, nor did he think it necessary. The plan did not include specific relocation measures. If indeed, 10,000 or more had to be evacuated where would they go? He didn't know anything other than vague generalities. The plan was a bunch of facts of uneven quality that had not been tied together. If this case was unique, then disregard my letter. If it is typical, then major changes should be made.

I propose that the NRC bring together a group of experts and members of the public to design guidelines or regulations for evacuation plans. These would contain requirements for data, methods, and coordination of the data in studies of simulation of responses.

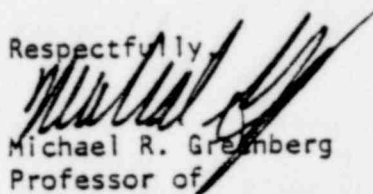
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I can elaborate my thoughts in detail if you are interested.

Respectfully,


Michael R. Greenberg
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Environmental Planning
and Health

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