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EDGEComb CITIZENS COMMITTEE
CONCERNED ABOUT NUCLEAR POWER
RD Box 346,
North Edgecomb, Maine 04556
8 August 1979

PUBLIC DOCUMENT ROOM

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



PETITION TO INTERVENE

SUBJECT:

NRC Document #7590-01, 12 July 1979
(10 CFR Part 50 Appendix E)
ADEQUACY AND ACCEPTANCE OF EMERGENCY
PLANNING AROUND NUCLEAR PLANTS

POOR ORIGINAL

The Edgecomb Citizens Committee Concerned About Nuclear Power, a non-profit group incorporated in the State of Maine, seeking to represent public interest in the matter of nuclear power, and comprised of citizens living within the evacuation zone of Maine Yankee nuclear plant hereby petitions to intervene in the matter of proposed rulemaking (NRC Document #7590-01, dated 12 July 1979). We petition the Nuclear Regulatory Commission to extend the deadline for public input on radiological emergency rulemaking an additional 60 days from the end of August to the end of October 1979.

The reason for this petition is that sufficient notice has not been provided for a reasonable amount of public input in a matter vital to public safety. Before reasonable and productive suggestions can be developed, time and money-consuming assessments must be undertaken.

SOME FACTORS BEARING ON THE SITUATION OF MAINE YANKEE:

- 1) GEOGRAPHY: Maine Yankee is sited at the head of an estuary next to an unprobed and major geologic fault. The earthquake

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resistance of its containment is dubious beyond force 6. Peninsulas with limited access contain various population clusters and project seaward of the plant limiting evacuation possibilities. Coastal snowstorms frequently blanket the area closing even principal arteries for extended periods of time. Temperature inversions are common over Maine Yankee. Gale winds and vulnerability to hurricanes could present special problems for air and sea evacuation. Many of the region's side roads are unpaved and impassable for periods of four to six weeks during Springtime due to mudding.

NOTE: The area is served by light duty overhead power and telephone lines which are frequently knocked out of service by even small storms.

- 2) ECONOMICS: The costs of an adequate response to radiological emergency would be monumental. Maine is the poorest state in the Union on a per capita basis. Lincoln County - most affected by an emergency at Maine Yankee is one of the poorer counties in the state. Lincoln County has a substantial number of elderly citizens on fixed incomes. Most towns are served by under-equipped, volunteer Fire Departments. Only a few can afford First Aid and Ambulance services.
- 3) LIFE STYLE: Because of its rural, wooded and seacoast nature many area people spend a good deal of time out-of-doors and out of reach of communication - away from their homes. These would include (but not exclusively) woodcutters, hunters, farmers, clam diggers, wormers, and fishermen. Adding to evacuation difficulties are four hospitals within the evacuation zone, several isolated nursing homes and, less than 30 miles downwind, Thomaston State Prison. To date Maine also lacks adequate reception facilities for evacuees.
- 4) POLITICAL: Maine people are, by and large, loyal and conservative. At present they tend to confuse accepting undue risk with patriotism. The distinction between a government

licensed - private utility and a Commonwealth necessity has not been made clear. Of a consequence most area citizens are unaware that the licensee bears no responsibility in an emergency situation beyond plantsite. It is a common, though at present unsupportable, belief that they will somehow "be taken care of". In fact, the question remains - who will bear responsibility for the lives, property, and future generations of Maine people in the event of a Class 9 accident?

SUMMATION:

The input of national public interest groups cannot be depended upon to best represent the interests of the region inasmuch as there is nothing to indicate that they are familiar with all the factors particular to, and affecting this area. While publication in the Federal Register may reach national public interest groups, area citizens were totally unaware of the proposed rulemaking, until the Edgecomb Citizens Committee attempted to disseminate such information after July 31, 1979. In fact the Edgecomb group would not have been aware of the call for public input had not a regular reader of the Federal Register in Washington forwarded a copy of the document referenced above.

We conclude that the legal charge of the Commission to provide for the public safety to the best of their ability has not been fulfilled. We so conclude because while de jure public notice may have been given, de facto notice (best accomplished in common media) was not given.

POOR ORIGINAL

Raymond G. Shadis

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for the Board of Directors
EDGECOMB CITIZENS COMMITTEE
CONCERNED ABOUT NUCLEAR POWER

RGS/jpr

cc: file

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