Washington Public Power Supply System
A JOINT OPERATING AGENCY

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PETITION RULE PRM-50-23(44FR3248

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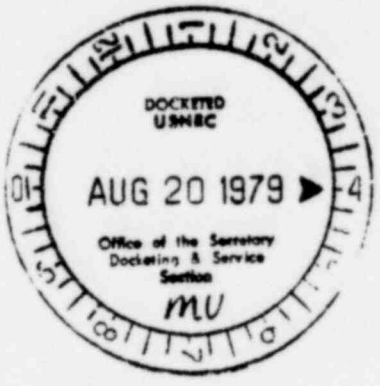

Docketing and Service Branch
Secretary of the Commission
Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Subject: CRITICAL MASS ENERGY PROJECT, ET AL
FILING OF PETITION FOR RULE MAKING

The following comments are submitted in response to the petition for rule making by the Critical Mass Energy Project, Docket Number PRM-50-23 in the Federal Register, Volume 44, No. 110, Wednesday, June 6, 1979, pages 32486 - 32487.

Coordinated Offsite Emergency Response Plan

The petitioners faiT to recognize that detailed plans have been developed for evacuation during a nuclear emergency for all nuclear power plants, with planning zones established according to the criteria of 10 CFR 100 and defined as the Exclusion Area and Low Population Zone based upon a projected exposure from a major nuclear accident. Detailed evacuation plans are established out to the Low Population Zone Boundary which may extend as far as 6 miles. It has been shown that detailed planning beyond this point, arrived at through 10 CFR 100 calculations, is unwarranted. History shows that occurrences such as floods, tornadoes, hurricanes and train wrecks involving toxic materials which have required evacuations have been conducted effectively without extensive detailed planning (EPA-520/6-74-002).

The designation of 50 miles for detailed emergency planning is an arbitrary distance which is not justified. Detailed planning should be conducted to a calculated distance based upon the design basis accident for the plant.

Tests of the Plan

Testing an emergency plan prior to construction achieves no increased level of public safety. The present guidelines of testing the plan prior to issuing the operating license are sufficient. Considering the time element of 8 years

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for construction of the plant, and an additional 3 years to develop the plan prior to issuance of a construction permit, it would require 11 years of effort before the plan is actually needed. Since it is estimated that the public moves on the average of once every 8 years, considerable effort and expense would be wasted on a population which would probably be relocated by the time the plant is operating.

The actual evacuation of a 7^0 sector of the population out to 30 miles is not reasonable. Instructions to the population to evacuate during disasters have been followed as shown in the many evacuations which have taken place throughout the United States (EPA-520/6-74-02).

Public Notice and Hearings

Granting a construction permit only after distributing information outlining the emergency response plan provides no improvement in the protection of the public. The long time involved between the start of construction and plant operation, changes in the plan, population changes around the plant, and lack of plant staff would make emergency planning efforts prior to construction not feasible or warranted.

Additional public hearings concerning the emergency plan are not necessary. Public hearings (which also cover emergency planning) are presently required prior to construction and operation of a nuclear power plant.

Consideration of Emergency Protection in Licensing and Siting

Again, the use of 50 miles for an emergency planning zone is arbitrary and extreme and is not supported as being necessary based upon analysis of the Design Basis Accident. A planning zone of 2 to 10 miles is sufficient.

The issuance of a construction permit only after formulating and testing an offsite emergency response plan provides only for an expenditure of resources and does not improve emergency response capabilities or provide any additional protection for the public.

Emergency Response Plans for Existing Reactors and Interim NRC Safety Action

Planning for offsite emergency actions to protect the public is already required by 10 CFR 50, Appendix E. The proposed analysis of each plant to determine which plants present the greatest risk to the public is based upon immaterial considerations. Reviewing the safety record of the plant, radiation exposure of workers, releases of radiation to environment, and the technical proficiency of the staff does not improve the emergency response capability of the plant. Design of the plant and population density have already been reviewed in the licensing process. Plants with emergency plans presently meeting NRC requirements should be considered as having adequate plans based upon satisfying the NRC requirements; acceptance of these plans should not be based upon operating parameters which are irrelevant to emergency planning.

Summary

The Critical Mass Energy Project petition does not provide a means of improving the emergency response capabilities for nuclear power plants. The proposal is extreme and nonproductive. The concept of developing and implementing emergency planning prior to construction and to conduct this detailed planning out to 50 miles eight years prior to operation is unwarranted. The present detailed planning conducted by nuclear power plants to satisfy 10 CFR 50, Appendix E and Regulatory Guide 1.101 in conjunction with emergency planning conducted at the local and state levels provide an adequate and workable approach for handling emergencies at nuclear power plants.

The proposal to conduct an annual evacuation of a 7^{o} sector out to 30 miles is impracticable. The potential for additional injuries outweighs the derived benefit based upon past experiences of evacuation for natural disasters and the established safety record of nuclear power plants. Requiring the nuclear industry to conduct extensive evacuation drills is not reasonable while dams, chemical refineries, and areas susceptible to natural catastrophies are not required to conduct major drills.

Finally, to analyze each facility based upon its operating record such as the criteria listed in Part 6 of the petition does not improve the plants' emergency response capability. The criteria listed are arbitrary and unrelated to emergency planning for coping with unexpected events.

For the above listed reasons, the Critical Mass Energy Project petition should be denied.

Very truly yours,

D L Renberger

D. L. RENBERGER
Assistant Director, Technology

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