

October 15, 1979

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C.



PUBLIC COMMENT--NUPRC-0610

The following general comments about emergency actions pertaining to nuclear power facilities (and other nuclear reactors) are based on the following assumptions:

1. Federal government officials owe loyalty to U.S. citizens.
2. It is desirable to plug in, plug in, the know-how and common sense of our ordinary citizens in looking after our own interests in an emergency.

I don't know the premises in the minds of those who wrote NUPRC-0610, but it appears that one premise is that government officials will decide when and where ordinary citizens are to be helped in the event of an emergency at a nuclear power facility. This strategy would have the following weaknesses:

1. It assumes that communication to the surrounding population will be rapid enough. Yet there are persons in the environs of nuclear reactors—
 - a. That have no telephones
 - b. That do not own or seldom listen to a radio or TV.
 - c. That are beyond earshot of warning sounds such as sirens, whistles.
 - d. That noisy storms may drown out warning signals.
 - e. That live too far from the road to hear announcements from police car or fire engine PA systems.
2. It assumes that a large fraction of the populace trust the truthfulness of public officials.
3. It assumes that an evacuation directed by government officials (directing many to leave at the same time, clogging the roads) would be preferable to people making their own decisions as to when to leave (over a period of time)
4. It assumes that the status of the emergency will be known by the directing government officials.
5. It assumes that at the time an evacuation is ordered, it will be possible to fuel public and private vehicles that are low on fuel (either by chance or due to a shortage of money). Would gas stations stay open?
6. It assumes that widely scattered people who do not have access to public or private transportation can be evacuated. Persons owning no private transportation are a growing fraction of the population.

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I suggest that instead of the strategy apparently underlying NUREG-0610, citizens be informed ahead of time of the dangers they will face in the event of various types of emergencies. The present situation simulates starting to train soldiers how to fight in the midst of a battle. People who wish to should be encouraged to make provisions and plans for an emergency by being told what dangers they might face. A goodly number of self-reliant Americans remain. Also, peoples' circumstances vary widely and so part of the decision-making should be left to individuals.

The following are examples of types of information that should be provided to all citizens residing, say, within 100 miles of a proposed nuclear power facility at the time of license application. Getting this information early will allow people to decide early whether they wish to remain and take the gamble. This information should be provided annually—by direct mail as well as media since some do not wish to pay attention to the media and others can't afford the time or money to do so.

1. The types of danger—e.g., from radioactivity in the air, water or food, rather than from an explosion.
2. The factors that decide the degree of danger for each type of emergency. The probable and worst consequences of each type of emergency. The isotopes (or groups of similarly acting isotopes) likely to be released and the effect on human health of each isotope taken into the body by various routes. The effects of weather conditions on the likelihood of exposure of a person in a given locale. Such weather conditions would include wind speed and direction, precipitation, and type of precipitation. Also, information from investigations of wind plumes from power plants on the likelihood of a plume touching down at various distances from a release. Also, information from the wind flower on the likelihood of the wind blowing in each direction at each month of the year.
3. The symptoms of radiation sickness. The susceptibility of various age groups to radiation damage.
4. The degree of protection by staying indoors. The ways of protecting oneself from radiation indoors, in an auto, and in the open.
5. Information on where people should go to be evacuated in the event of an emergency and where to go to get information.
6. The desirability of leaving an area containing a nuclear power facility in the event of an earthquake, flood, tornado, or hurricane.
7. Provisions for evacuating sick or disabled persons.

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