

Docket No. 50-358

August 8, 1980

U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555

Attention: D. G. Eisenhut, Director  
Division of Licensing

Re: WM. H. ZIMMER NUCLEAR POWER STATION-  
UNIT 1 - CITY OF MENTOR'S OBJECTIONS  
TO COMPANY'S EVACUATION TIME ESTIMATES

Gentlemen:

On August 1, 1980, Cincinnati Gas and Electric Company submitted evacuation time estimates for the Zimmer Nuclear Power Station to the Nuclear Regulatory Commission. Part of the study was performed by the Kentucky Division of Emergency Services, and the following remarks apply to that part.

Mentor is the city in Kentucky nearest to the Zimmer Nuclear Power Station and has a strong interest in the development of sound emergency response plans. It has demonstrated its concern by becoming a party in the licensing procedure of the Atomic Safety and Licensing Board. Mentor takes issue with the study and advises this office that the city does not concur with it.

Mentor was not advised that the study was contemplated or that it was being prepared, was not consulted during its preparation, did not participate actively or passively in its preparation, and was not informed of its completion or that it had been transmitted to the company. Mentor has had no opportunity to inspect, modify, or approve the study or any part of it either before or after it was presented to the company.

This study does not respond, or responds inappropriately or incompletely, to several elements in NUREG - 0654 (see especially II-J-8; II-J-10a, b, g, i, k, l; and Appendix 4). Since NUREG - 0654 (part I-C) states that NRC regards "all of the elements contained here as essential for an adequate radiological emergency plan" (emphasis added), the study must be reviewed with its completeness according to the standards and criteria of NUREG - 0654 foremost in mind.

Among other deficiencies, the study is deficient in that it

--does not provide evacuation time estimates for the 2 miles and 5 miles distances.

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To: U.S. Nuclear Regulatory Commission

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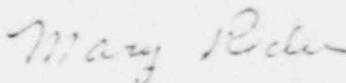
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- does not provide evacuation time estimates by sectors.
- does not contain population figures.
- does not contain road traffic capacities.
- includes estimates for only one of the several special facilities and problem-situations within the EPZ.
- is so rudimentary in its statement on methodology that neither the methodology nor the relationships of the conclusions to a methodology can be evaluated.
- does not provide alternate evacuation routes or for traffic flow in the opposite direction on the provided routes in consideration of different plume directions.
- does not mention a serious road hazard that presently exists on an evacuation route (deterioration of KY. Route 8).

This study does not reflect the guidance of NUREG - 06.14 and has not had the benefits of the unique insights, knowledge of the area, and experiences of the City of Mentor.

Respectfully,



Mary Reder  
Representative of the City of Mentor

cc: Charles Bechhoefer  
Glenn O. Bright  
Frank G. Hooper  
Troy B. Conner, Jr.  
Charles A. Barth  
ASLB Panel  
Michael C. Farrar  
NRC Docketing & Service Section  
William J. Moran  
W. Peter Heile  
Leah S. Kosik  
John D. Woliver  
David K. Martin  
Robert A. Jones  
Andrew B. Dennison  
Dale D. Brodkey