

QUESTION 2a.

Is it relevant to judging the adequacy of a proposed emergency evacuation plan that:

- (a) The site of a plant makes it unusually difficult to evacuate? If not, why not?

ANSWER.

Yes. In preparing the Preliminary Safety Analysis Report during the Construction Permit review, a nuclear power plant applicant is required to note major impediments to evacuation or to the ability to take protective actions (10 CFR Part 50, Appendix E.II.G). The staff requires that the proposed Emergency Plan address such difficulties and include the necessary arrangements and resources to remedy the difficulties.

There are approximately 70 licensed plant sites in the United States for which emergency plans have been developed and approved. Many of these sites present evacuation difficulties of one type or another, but FEMA and NRC have worked with the licensee and state and local governments to ensure appropriate response to these difficulties. In all cases, it has been concluded that there is reasonable assurance that adequate protective actions can and will be taken in the event of a radiological emergency at each of the sites.

The Commission has also addressed this issue directly in its new regulation on early site permits (10 CFR Part 52, Subpart A). Section 52.17(b)(1) of that rule requires that "the applications must identify physical characteristics unique to the proposed site, such as egress limitations from the area surrounding the site, that could pose a significant impediment to the development of emergency plans."