

Citizens Urging Responsible Energy

February 27, 1991

Mr. R. Erickson, Chairman
Emergency Planning Task Force
US Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Erickson:

It was good to meet you on Monday. We appreciate the opportunity to voice our concerns and to provide documentation to the Task Force. However, we do feel the Inspector General's report has established that the Boston Edison Company is not the best source of information on the status of offsite planning. We understand, of course, the need for a question line as to their support or interface with the offsite program.

I have enclosed a revision to page 1 of the statement that I made at the meeting. It contains one correction: the number of hospitals which have agreed to act as "host only" should be 3. Some other minor changes have been made for clarification. I have underlined them for your convenience. Please provide us with a copy of the meeting transcript when it becomes available.

Finally, we would like to know if your committee was provided with the copies of the documents we submitted for inclusion into the record of the October 30, 1990 meeting of the Interior Subcommittee on General Oversight and Investigations chaired by Representative Peter Kostmayer in Plymouth. (Appendix enclosed)

We look forward to your reply.

Sincerely yours,



Mary C. Ott, Co-Chairman

cc: Duxbury Board of Selectmen

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Statement for record of Nuclear Regulatory Commission Task Force Meeting in Plymouth, MA - February 25, 1991, by Mary C. Ott, Co-Chairman

revised - 2/27/91

I thank you for the opportunity to make a brief statement this afternoon. Since many previous speakers have articulated a host of concerns, I would like to focus on one we feel is of primary importance to the successful implementation of emergency planning; that of offsite medical services.

According to 10 CFR 50.47 (b)(12) there is a requirement that pre-accident arrangements for medical services (beyond the maintenance of a list of treatment facilities) exist for individuals who might be severely exposed to dangerous levels of offsite radiation following an accident at a nuclear power plant.

We have reviewed a collection of letters of understanding which exist between medical facilities and the Commonwealth. The copies were received on February 8, 1991 from Julia Gabaldon of MCDA.

The letters reveal that 13 facilities have "agreements" with the Commonwealth. There are a total of 15 letters, as two facilities serve the dual purpose of host. Close scrutiny reveals:

1. Three facilities will act as host* only.
2. One facility will ^{not} accept contaminated patients
3. Ten letters do not specify in case of a "radiological" emergency at FNPS
4. Jordan hospital's agreement is with BECo and for workers. This facility is within the EPZ.
5. Two hospitals are on Cape Cod, therefore will be inaccessible, as evacuation procedures call for the closing of the Sagamore Bridge

The remaining facilities can only treat a maximum of 2-3 radiation contaminated injured individuals within a 12 hour period. Therefore it would be impossible to respond to the needs of over 100,000 residents of the EPZ should assistance be required.

*those facilities agreeing to provide assistance for nursing home, or home patients requiring temporary relocation

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ATTACHMENT I

Appended list of documents for inclusion into the record of the October 30, 1990 meeting of the Interior Subcommittee on General Oversight and Investigations in Plymouth, Massachusetts:

1. October 6, 1989 letter from Edward F. Lawson, on behalf of Duxbury CURE regarding scheduled October 12, 1989 drill
2. October 15, 1989 letter from Mary C. Ott with complete allegations to Inspector George Mulley
3. January 10, 1990 letter to Mr. Abduhl Hamadeh regarding continuing misrepresentation of facts by the NRC
4. March 19, 1990 letter to Jon R. Johnson from Duxbury CURE and David L. Quaid citing Pilgrim's history since return to operation
5. July 30, 1990 letter to Senator Edward M. Kennedy from Duxbury CURE calling for support for Pilgrim's shutdown until balance of allegations are investigated, and emergency planning is approved
6. September 6, 1990 letter to NRC Chairman, Kenneth Carr from Duxbury and Plymouth CURE in response to NRC actions taken as a result of the Inspector General's report
7. Statement of Duxbury and Plymouth CURE at September 6, 1990 NRC meeting in Plymouth, Massachusetts
8. NRC Inspection Report 50-293/90-21 regarding a September 2-3 operating event at Pilgrim which demonstrates that public health and safety are being jeopardized while we have no approved emergency planning in place. We will furnish the committee with an analysis of this event within one week.