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7 St. William Street
Dorchester, MA 02125
March 3, 1987 P3 20

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Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear Sirs:

This letter is to register my firm opposition to the proposed rule changes which would either limit the role of individual states to review and/or approve the evacuation plans for any nuclear power plant or that would reduce the size of the present ten mile evacuation zone.

My opposition is based on the facts that the present road network in and around the Seabrook, N.H. power plant is presently unable to handle the routine summer traffic that is experienced almost daily. Evacuation planning for this area actually routes traffic toward the nuclear power plant in order to access state and interstate evacuation routes. Peripheral roads are narrow two lane roadways unsuitable for handling present peak traffic loads, let alone an evacuation.

In addition, local police, fire and ambulance services are small in nature and without sufficient manpower or vehicles to effectively route an evacuation or to evacuate those without transportation. Response of state police, mutual aid units and civil defense units in sufficient numbers to be of direct assistance would take hours.

We New Englanders look forward to our cooling offshore seabreezes each summer and dread our infamous nor'easters each fall and winter. Reduction of the ten mile evacuation zone ignores the local weather patterns which would direct any radioactive release inland during our frequent east to west coastal breezes.

Even a gentle breeze of ten miles per hour would mean that TOTAL evacuation of the present ten mile zone would need to occur within 60 minutes, in order to avoid contact with any contaminants. This is predicated on immediate detection of every leak, immediate activation of the evacuation alarms and immediate evacuation by the populace. Any delay at any step would reduce the 60 minute 'safe' evacuation time.

A reduced evacuation zone or even an offshore storm would endanger the safety of the citizens around Seabrook and turn the evacuation planning into an exercise of the absurd.

The combination of a poor road network, local weather and geographical conditions, the influx of a large summer population, limited local resources to deal with an emergency situation and a woeful lack of emergency preparedness beyond the planning stage makes the situation surrounding Seabrook ripe for our nations first nuclear catastrophe.

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I invite you and the members of the N.R.C. and staff to drive along Route 1 or 1A on a summer weekend in the vicinity of Seabrook. Massachusetts officials have researched the possibility of evacuating the communities within the ten mile zone and found it to be unrealistic. Response of sufficient personnel and vehicles to route fleeing traffic, evacuate those without transportation, remove the patients in nursing homes and hospitals and the elderly in housing developments would take several hours to initiate, let alone begin the actual evacuation.

The mistaken idea that officials at Seabrook could develop a plan that would even remotely deal with reality, let alone be the basis for a working evacuation would turn over responsibility for the protection of the citizens of Massachusetts to the very people who have already demonstrated their inability to comply with existing safety regulations. The readily apparent conflict of interest here should alarm you and your staff and encourage a rethinking of the role of the N.R.C. and its responsibility for the safety of nuclear power plants.

No plan will work or even begin to be a basis for an exercise unless:

- a. the plan is published and distributed in full to all state and local agencies involved in carrying out the plan. A series of tabletop exercises must follow to iron out the problems encountered until the most likely scenarios have all been practiced.
- b. the plan must then be distributed to the chief officers, managers, directors and supervisors in each agency and practiced within each agency until its role and responsibilities are clearly understood.
- c. the plan must then be distributed to every member of every agency involved so that they understand what is expected of them, who is available to assist and where the necessary equipment will be before they are needed.

Experiences gained by the fire and emergency medical services organizations in this country show that pre-planning and practice are vital to the successful management of large scale incidents. Mere planning is NOT sufficient to assure the safety of the public.

No federal or private agency or company can draw up workable plans for any local mass casualty, disaster or evacuation situation. Only local and state officials have enough information to decide what can and cannot be done. Massachusetts officials have determined that evacuation is not feasible and to consider reducing the evacuation zone to make it feasible is tantamount to criminal negligence in light of what happened at Chernobyl.

I urge you to leave the present rules intact and to consider strengthening the role of the state governments in assuring the safety of their citizens.

Yours Truly,

Paul H. Coffey

Paul H. Coffey,

cc: President Ronald Reagan
Senator Edward Kennedy
Senator John Kerry
Governor Michael Dukakis