

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Director, Office of Nuclear Reactor Regulation

'88 APR 13 P3:51

In the Matter of)
)
THE CLEVELAND ELECTRIC ILLUMINATING)
COMPANY, ET AL.)
)
(Perry Nuclear Power Plant, Units 1)
and 2))
_____)

Docket Nos. 50-440/441
2.206 Petition

OFFICE OF PUBLIC AFFAIRS
REGULATORY SERVICE
BRANCH

CONCERNED CITIZENS' REPLY TO RESPONSE OF THE CLEVELAND
ELECTRIC ILLUMINATING COMPANY TO THE PETITION ON THE
EMERGENCY INFORMATION HANDBOOK

This reply addresses the March 9, 1988 response of the
Cleveland Electric Illuminating Company to the 2.206 petition
filed by the Concerned Citizens of Lake County, Concerned
Citizens of Ashtabula County, and Concerned Citizens of Geauga
County on September 22, 1987 regarding the emergency
information handbook for the Perry Nuclear Power Plant.

While not explicitly conceding the validity of Concerned
Citizens' petition, CEI nevertheless took corrective action in
revising the handbook that, by CEI's own admission, has
"mooted" many of the petition's complaints. Concerned Citizens
finds that, in substantial part, the relief requested in the
petition has been granted by CEI's revision contained in the
1988 calendar. Indeed, the the word "mooted" throughout CEI's
response could easily be read as "alidated" or "affirmed".
Accordingly, Concerned Citizens herein focuses attention on the
portions of the 1988 calendar which remain objectionable, and
requests that the Director issue a decision on only these
matters. A ruling on all other matters is unnecessary, as the

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1988 calendar has rectified the major deficiencies in the October 1986 handbook.

1. It is not clear that the 1988 calendar has been distributed to businesses within the plume EPZ. This is important, as persons who live outside the EPZ but work within the EPZ are without information on emergency planning in the event of an accident at Perry. Similarly, the page on emergency planning which was distributed by Ohio Bell to remedy the omission of that page from the phone book (see CEI Response at 63) may not have been delivered to businesses. Also, the page did not have any instructions or explanation that it should be placed in the phone book; thus, it is likely that recipients did not put the page in the intended location, if they kept it at all.

2. CEI's Response (p. 45) erroneously asserts that the receiving schools are firmly established. The fact is that, in an emergency, the receiving schools may have to be changed if they are in the path of the plume. This is conceded by the affidavit of Daniel Hulbert, p. 9, where he states that, if an expansion of the evacuated area were necessary while the schools were in use, the children would be relocated. The handbook should emphasize that parents should listen to the EBS broadcasts to confirm the location of the receiving schools before going to pick up children, because the schools are subject to change depending on wind direction. Without this caution, parents are likely to proceed to the schools listed in the handbook, unnecessarily risking exposure to the plume and

creating heavy traffic on roads needed for evacuation of residents.

3. Page 16 of the 1988 calendar remains objectionable. It fails to distinguish between ionizing and nonionizing radiation in claiming that "people cannot see, taste, feel, hear, or smell radiation" but then including "heat, light, and radio waves" as examples of radiation. According to this passage, we should not be able to see light or feel heat. This explanation is erroneous and tends to undermine the credibility of the handbook. (Compare the quote from Consumers Power Co. (Big Rock Point Plant), LBP-82-60, 16 NRC 540, 554 (1982) included at p. 11 of CEI's Response.) The problem can be easily corrected by using the word "radiation" to mean ionizing radiation throughout the discussion on p. 16 of the calendar under "Sources of Radiation", and changing that section as follows: (a) First paragraph: Delete third sentence. In the second sentence, change the word "energy" to "radiation". (b) Fourth paragraph: delete the last sentence.

The section then remains readable and no longer contains false information.

The discussion under the section "Dangerous Levels" falsely asserts that doses of radiation less than 25 rems are harmless. This is contradicted by government documents; for example, Report of the Interagency Task Force on the Health Effects of Ionizing Radiation, Department of Health, Education, and Welfare, June 1979: "Doses in the 0.2 to 20 rem range appear to

increase the risk of childhood cancer." (p. 32). See also Environmental Protection Agency, A Citizen's Guide to Radon, OPA-86-004, August 1986: "Scientists estimate that from about 5000 to about 20,000 lung cancer deaths a year in the United States may be attributed to radon."

The section on "Dangerous Levels" should be rewritten as follows:

"You should avoid unnecessary exposure to radiation. Large amounts of radiation, 100,000 millirems or more, received in a short period of time, can cause radiation sickness and death. Smaller doses increase the risk of cancer and birth defects. Many scientists feel any amount of radiation has a risk."

4. The special needs information card should be postage paid and pre-addressed. If persons must expend too much effort or incur any expense the card is not likely to be returned. An easy solution for addressing the cards would be to include peel-off stickers, one for each county EMA so the person can choose the appropriate county EMA address.

5. The information about the Three Mile Island accident on page 17 of the calendar tends to create complacency about nuclear accidents, thereby undermining the message and purpose of the handbook, as explained in our Petition. In addition, there is controversy about the health effects of the TMI accident. To state that the TMI radiation releases are not a

hazard to the public is inconsistent with the views of many scientists that there is no safe dose of radiation. The material under the heading "Safety" in the calendar should be removed.

Respectfully submitted,

Connie Kline

Connie Kline
38531 Dodds Landing Drive
Willoughby Hills, OH 44094
(216) 946-9012

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CERTIFICATE OF SERVICE

This is to certify that the above has been sent to the following by U.S. Mail, first class, postage prepaid:

Dr. Thomas Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Jay Silberg, Esq.
Shaw, Pittman, Potts, and Trowbridge
2300 N Street, NW
Washington, DC 20037

Mr. Robert A. Meck
Emergency Preparedness Branch
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. William G. Snell
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Rd.
Glen Ellyn, IL 60137

Ms. Margaret Lawless
FEMA
500 C St. SW
Washington, DC 20472

Mr. Dan Bement
FEMA
Region V
175 West Jackson, 4th Floor
Chicago, IL 60604

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Andrew Grandjean
Division of Nuclear and Gas Pipeline Safety
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43266-0573