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**Sent:** Tuesday, June 30, 2020 9:40 PM  
**To:** AdvancedReactors-GEIS Resource  
**Cc:** 'Meredith Angwin'; 'George Angwin'; 'Robert Hargraves'  
**Subject:** [External\_Sender] Support of GEIS's for Advanced Reactors

1. The NRC already has a type of GEIS for current LWR's in the Emergency Planning Requirements. The 10 mile Emergency Planning Zone is required for reactors of all power ratings, whether 600 MW or 1200 MW. It appears that the concept of "generic" within a range is already accepted.
2. It is suggested that the NRC consider a few GEIS's for Advanced Reactors that depend on the ranges of the potential releases. Using the potential release as a measure may accommodate reactors of different powers, amount of fission products in the plant at the largest point, moderators, coolants and structural materials. Other emissions: cooling water, exhaust air etc. will also be included.
3. Litigating the size of the EPZ for each plant is a waste of effort, when EPZ's for each GEIS class can exist. Based on existing Emergency Plans, and the good experience at the Fukushima plants, protection measures are known. In the Fukushima plants accident, evacuation of the population was ordered hours before the first release. In this accident the containments were subjected to meltdowns, creating much more stress than their design basis, before leaking. There were no reported dangerous exposures to any of the population.

Deaths of elderly evacuees from Nursing Homes were due to being moved, and insufficient life support, proving they would have been better off staying put and getting a little radiation exposure. For an eighty year old to be moved to avoid an exposure with a small chance of giving them cancer in twenty years was unfortunate.

4. Litigating the EIS for each plant will cause expense and delay. Nuclear opponent Christopher Williams of Vermont has boasted that price is the Achilles Heel of nuclear power plants, and causing delay in the licensing of several plants resulted in abandonment of the projects. This is the opponents objective.

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