

**From:** [Jean Farris](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2020-0101: Do Not EVER, IN ANY WAY, Weaken Emergency Preparedness for Nuclear Reactors and Other Nuclear Facilities--Strengthen it!  
**Date:** Tuesday, July 21, 2020 1:03:41 PM

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Nuclear Regulatory Commission (EPZs)

RE: Docket ID NRC-2020-0101: Do Not EVER, IN ANY WAY, Weaken Emergency Preparedness for Nuclear Reactors and Other Nuclear Facilities--Strengthen it!

Dear ,

Commissioners and Staff of the Nuclear Regulatory Commission:

I am writing in EXTREMELY STRONG, HORRIFIED opposition to the U.S. Nuclear Regulatory Commission's INSANELY proposed NEGLIGENT rule change, docketed in the Federal Register (NRC-2020-0101), to DANGEROUSLY reduce the CRITICALLY NEEDED emergency preparedness requirements for small modular reactors, "other new technologies," and production and utilization facilities.

The scope of this POLITICALLY-MOTIVATED, IDIOTIC rulemaking could potentially affect millions of people. AS WE ALL VERY WELL KNOW, because of the COVID19 Pandemic, many people do not have the time to IMPORTANTLY engage and review it right now. In light of this reality, I strongly encourage NRC to IMMEDIATELY extend the CRUCIALLY IMPORTANT comment period to, AT THE VERY LEAST, 6 months after the REAL end of the COVID-19 crisis.

NRC is DISASTROUSLY proposing to UNCONSCIONABLY eliminate the IMPERATIVE requirement of dedicated minimum Emergency Planning Zones (EPZs) for the above-referenced facilities, and for site-specific Emergency Response Plans that must be METICULOUSLY reviewed and approved by the Federal Emergency Management Agency (FEMA). Instead, the proposed WOEFULLY INADEQUATE regulations would ACTUALLY EGREGIOUSLY allow licensees to determine ON THEIR OWN...WITHOUT ANY OVERSIGHT, what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This INSANELY proposed rule change must be IMMEDIATELY AND PERMANENTLY rejected.

Emergency planning requirements have been a STRONG, ENDURING bedrock of nuclear safety regulation for over 40 years, since the Three Mile Island disaster proved, ONCE AND FOR ALL, that large releases of radiation were possible, ad hoc emergency response measures are OUTRAGEOUSLY inadequate, and that nuclear disasters DO ACTUALLY HAPPEN AND present DEADLY, unique challenges requiring RIGOROUS, CONSTANT advance preparation and FULL coordination with state and local agencies. NRC has affirmed the GRAVE importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

IT IS BLATANTLY OBVIOUS THAT meticulous emergency planning requirements for nuclear facilities will be MUCH more essential than ever due to THE EVER-WORSENING CLIMATE CRISIS. Natural disasters that could EASILY cause nuclear emergencies, as well as complicate emergency response plans, are increasing in both severity and frequency. But NRC's HIGHLY FLAWED proposed rule and supporting documents do not even mention THE CLIMATE CRISIS or EVER-INCREASING extreme weather events EVEN once! It is NOT ONLY arbitrary and capricious BUT UNCONSCIONABLY NEGLIGENT for NRC to HYPOCRITICALLY promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

Emergency planning is part of the social contract for commercial nuclear facilities. It is the very last line of defense to protect public health and safety when safety regulations, reactor designs, defense-in-depth, and NRC oversight fail. The public ALWAYS bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the DEADLY GROTESQUE Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act DISASTROUSLY limits the nuclear industry's collective liability for radiological disasters at its facilities to ONLY A MEAGRE \$13 billion. Under the act INADEQUATE, INNOCENT victims are left to seek damages from the federal government, UNCONSCIONABLY forcing the public to sue our own government and ultimately UNFAIRLY requiring our fellow taxpayers to pay the bill for the NEGLIGENTLY RESPONSIBLE industry's DEADLY failures. In exchange for subjecting the public to what, ULTIMATELY, may MOST CERTAINLY BE incalculable losses to LIFE, health, family, career, community, and home, NRC licensees, WITHOUT QUESTION, must create and maintain (and COMPLETELY pay for) RIGOROUSLY WORKABLE plans to enable ALL EFFECTED people to get TOTALLY out of harm's way when nuclear safety measures fail and probability estimates prove wrong.

In practice, NRC's current FLAWED emergency planning requirements under 10 CFR 50.33 have been demonstrated to be TOTALLY inadequate in real-world situations. They should IMMEDIATELY be made MUCH more stringent, not EVER, IN ANY WAY, less, and not EVER based solely on calculations of risk.

AS WE ALL WELL REMEMBER, VERY large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the INADEQUATE 10-mile radius evacuation zone NRC CURRENTLY requires; in fact, the US government STRONGLY recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, INTELLIGENT restrictions on ANY consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current NEGLIGENT food and water ingestion pathway EPZ of A TOTALLY INADEQUATE 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain EXTREMELY large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is ACTUALLY intended to be, IN FACT, built with 12 reactor units in a single reactor building, making each NuScale plant THE TRUE equivalent to a conventional FULL-SCALE large reactor. As the Fukushima Dai-Ichi disaster CLEARLY proved, ONE single event can EASILY cause multiple reactor failures on the same site: all three operating reactors melted down; also, AS YOU WILL RECALL, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the DISASTROUS potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is DANGEROUSLY arbitrary and capricious for NRC to UNCONSCIONABLY assume that license applicants for new reactor designs should UNTHINKABLY be able to NEGLIGENTLY exempt themselves from CRITICALLY NEEDED emergency planning requirements solely on the basis of SPECIOUS risk calculations. NRC has no experience, WHAT-SO-EVER, regulating many potential reactor designs.

In addition, by NEGLIGENTLY creating a "process" for "small" reactors to eliminate, WHAT THEY SEEM TO SEE AS INCONVENIENT offsite emergency planning INSTEAD OF LIFE-SAVING PRACTICE, through ONLY a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, NRC is APOCALYPTICALLY opening the door for reactors of any size, design, and EVEN vintage to DESTRUCTIVELY reduce or eliminate CRITICALLY NEEDED emergency planning.

NRC BLATANTLY appears to be ESCHEWING ITS' FUNCTION BY HEINOUSLY subjugating its" prime responsibility to FULLY protect the public health and safety under the Atomic Energy Act as amended in 1975 to INSTEAD DISASTROUSLY, IMMORALLY PROP-UP industry financial interests in lightened regulatory burden and streamlined licensing procedures. The public can have ABSOLUTELY no confidence AT ALL in this

INSANELY proposed regulation, and it must be rejected!

Sincerely,  
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