

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing & Service Branch

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USNRC

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Gentlemen:

I am opposed to your proposed rule change regarding Emergency Planning Zones, (EPZ's) which would call for site specific EPZ's instead of the current 10 mile emergency planning zones surrounding most plants.

A 1982 study conducted by Sandia National Laboratories for the NRC concluded that "under adverse weather conditions a severe reactor accident with containment failure could cause early (within one year) fatalities as far as 25 miles from a reactor site." The Chernobyl accident caused the Soviet Union to evacuate an 18.6 mile radius and some towns as much as 50 miles away because of radioactive hotspots. Moreover, the ingestion pathway of the Chernobyl accident exceeded the NRC's 50 mile standard by more than 20 times. Food from 1200 miles away was contaminated.

Furthermore, EPZ's must be large enough to account for the "shadow phenomenon", or spontaneous evacuation by those outside the minimum required planning zone. Evacuations cannot be controlled; this phenomenon must be considered in order to prevent casualties to those closest to the reactor. A larger EPZ would help in this planning.

"Source term" data you presume to base your EPZ zones on is not a realistic approach. This data is based on computer models and not real-life data. Chernobyl has proved the worst case accident which the industry has said could never happen. A minimum 20 mile EPZ should be required, and expanded but not reduced on site specific data. Local & state government should review and concur on such plans; no plans should be approved without state and local agreement.

The attitude by the NRC toward emergency planning is unconscionable; a citizens petition calling for a 20 mile EPZ minimum was presented to the NRC in 1981 and has had no consideration for 5 years! Your lack of concern for emergency planning will be challenged by the people. We urge you to expand the minimum 10 mile EPZ to 20 miles, with site specific data to expand this and local and state approval to be part of the process.

Chernobyl has been a lesson to the people; will it be a lesson for the NRC?

Very truly yours,
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MAR 27 1987