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Public Protective Actions During a General Emergency

Comment On: NRC-2020-0155-0003
Public Protective Actions During a General Emergency

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Comment on FR Doc # 2020-18746

Submitter Information

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General Comment

The Nuclear Energy Oversight Project (NEOP) by and through its Executive Director, Thomas Saporito - hereby submits comments to the NRC Proposed Rule: "Public Protective Actions During a General Emergency" as documented in the uploaded document accordingly. For the reasons set-out in the uploaded document - NEOP recommends that the NRC Commission REJECT NRC-2020-0155-0003 accordingly.

Attachments

2020.10.25 NEOP Comments - Public Protective Actions During a General Emergency



Nuclear Energy Oversight Project

*"Oversight of the U.S. Nuclear Regulatory Commission
to protect public health and safety and the environment"*

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October 25, 2020

U.S. Nuclear Regulatory Commission

RE: NRC-2020-0155-0003 - Public Protective Actions During a General Emergency

The Nuclear Energy Oversight Project (NEOP) by and through its Executive Director, Thomas Saporito - hereby submits comments to the NRC Proposed Rule: "Public Protective Actions During a General Emergency" - as follows:

NEOP states that any proposed rule related to a General Emergency Declaration at a commercial nuclear power plant - should be considered in light of a **"worst case"** scenario - involving a Loss of Coolant Accident (LOCA) - in which the nuclear reactor core melts down through the bottom of the nuclear reactor vessel - and melts through the bottom of the nuclear reactor containment building. (See Fukushima Daiichi Nuclear Disaster; and Chernobyl Nuclear Disaster for reference).

NEOP avers here that during a General Emergency Declaration involving a LOCA - there currently does NOT exist any NRC rule or regulation - which would protect the health and safety of the public or protect the environment. Notably - a LOCA which results in a nuclear reactor core meltdown as described above - would result in a huge release of hydrogen within the nuclear reactor containment building. The huge plume of hydrogen would likely result in a tremendous explosion and spew a massive amount of **HIGHLY RADIOACTIVE PARTICLES** into the environment - which would be carried in the direction of the prevailing wind streams existing during the LOCA. The NRC along with government officials and the mainstream news media would most likely - alert the public about the extent of the LOCA - and about the need to immediately evacuate the area within 50-miles of the effected nuclear reactor. To the extent that the NRC or government officials would advise the general public to shelter in-place - that advise would likely result in tens-of-thousands of deaths. To the extent that the NRC and/or government officials advise the general public to evacuate (for example) the state of Florida - the resulting panic and traffic jams would result in tens-of-thousands of deaths.

NEOP notes here that during recent hurricanes that effected the state of Florida - **all major roadways were packed with bumper to bumper traffic for days on end - with people trying desperately to leave the state!**

Conclusion

For all of the above-stated reasons - Petitioner's proposed rule change would NOT provide any realistic benefit to protect public health and safety and would NOT provide any realistic benefit to protect the environment. Therefore, NEOP recommends that the NRC Commission **reject** Petitioner's Proposed Rule Change - **NRC-2020-0155-0003** "Public Protective Actions During a General Emergency" accordingly.

For the Nuclear Energy Oversight Project

A handwritten signature in blue ink, appearing to read "Thomas Saporito". The signature is fluid and cursive, with a large initial "T" and "S".

Thomas Saporito, Executive Director