

# **Emergency Planning for the Possible**

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# **Fundamental Problems Overlooked**

**The proposed final rule fails to  
require consideration of and  
preparation for all possible  
emergency situations or institute  
performance based standards with  
which to ensure the effectiveness  
of nuclear power plant emergency  
plans under all such situations**

# **Licensees Must Prepare for “The Worst”**

- **50-mile evacuation zone**
- **Accurate plume transport model**
- **Realistic ETE development**
- **Beyond design basis threats**
- **Adequate back-up Alert and Notification System**
- **Rapid escalation to General Emergency**
- **Credible range of drill scenarios**

# **NRC Should Implement Performance-Based Standards**

- **ETEs**
- **Licensee coordination with Offsite Response Organizations**
- **Emergency declaration timeliness**
- **Drills**

# **Other Recommendations**

- **Fully consider the lessons of Fukushima prior to finalizing NRC Staff's proposed final rule**
- **Incorporate emergency preparedness into plant license renewal reviews**

# **Indian Point**

- **Uniquely situated**
- **Existing Emergency Plan:**
  - **Completely Unworkable**
  - **Notable lack of confidence in effectiveness of plan**
- **And yet, consistent NRC and FEMA approval**