

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**