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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemaking and Adjudications Staff
secy@nrc.gov re: PRM-50-85

Proposed Rules 10 CFR Part 50
Federal Register, vol. 72, no. 131
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Docket No. PRM-50-85
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14

The following comments address a Petition for Rulemaking submitted by Eric Epstein, Chairman of TMI Alert, Inc., Harrisburg, PA. The following comments, are in support of this petition, and are submitted by the Environmental Coalition on Nuclear Power, with headquarters in State College, PA, and on behalf of the Pennsylvania Chapter of the Sierra Club.

According to the NRC's Federal Register summary, the petition asks the Commission to amend its Emergency Preparedness Regulations to require that all host school pick-up centers be located at a minimum distance of five to ten miles beyond the radiation plume exposure boundary zone to ensure that the health and safety of all school children are protected in the event of a radiological emergency.

Rapidly growing young children are considered to be particularly adversely affected by radiation exposures, according to the International Commission on Radiological Protection, the U.S. National Commission on Radiological Protection, National Academy of Sciences BEIR V and VII Committee reports, and other authoritative scientific and medical bodies.

Unquestionably, a ten mile evacuation zone is insufficient to assure necessary protection for youngsters in the event of a radiation release. An added five to ten miles will not be sufficiently protective. Many residents of the TMI area recall all too well the confusion and chaos that accompanied retrieving their children from schools located well within the ten-mile zone during the March 1979 TMI-2 accident voluntary evacuation. The TMIA recommendation is an improvement over present regulations and should be adopted.

However, in view of the NRC's current review of all 495 of its Regulatory Guidance documents (495 according to the staff report to the Advisory Committee on Radioactive Waste, September 19, 2007), we submit that the additional five to ten miles of protective distance would be inadequately protective for children. The full range of the magnitude of potential releases, weather and travel conditions, time of day, and other factors must be reviewed and included in the siting of collection centers, and even more so for relocation centers.

For details of severe accidents, the NRC must re-review and utilize updated calculations based on the now-dated 1982 Sandia National Laboratory's CRAC-2 Report (Calculation of Reactor Accident Consequences at U.S. Nuclear Power Plants). As the urban agglomerations near existing reactors have grown in the quarter of a century since CRAC-2, those earlier calculations, updated, will present even greater fatalities, subsequent illnesses, genetic damage, and premature deaths among the young. NRC cannot ignore the impacts of growth over the passage of time.

Moreover -- based in part on the recently adopted ICRP "less protective" dose standards; and in coordination with the recent revision of IAEA Basic Safety Standards; and on NCRP's similar actions in progress; and on NRC's revision of 10 CFR 20 exposure standards; and the extension of adoption to apply to all other Code Parts "by reference" only -- we have a great concern that the NRC's intent is to use "consistency of approach" to radiation exposure standards in order to relax or eliminate radiation protection, in turn in order to benefit the nuclear industry, rather than to provide improved protective dose limits for the public.

The TMIA petition is a desirable counter to the NRC's apparent intent to expose the public to increasing levels of radiation exposure. We urge its adoption.

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