

**Rulemaking Comments****PRM-50-104  
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USNRC

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**From:** Sunny Miller [sunny@sunnymiller.us]  
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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Evacuation plans for nuclear accidents or attacks at nuclear reactors (and especially at above-ground, radioactive waste pools) in the US are outdated and sorely inadequate. Circles on a map outlining 10-mile and 50-mile distances from aging reactors reflect wishful thinking, not preparations in the public interest. Fluctuating weather will determine contamination patterns. Wind strength, direction and rainfall change daily, while evacuation plans are ill-conceived predictably inadequate, year after year. Please, get real.

Specifically, the current 10-mile emergency evacuation zone is ludicrous. The real world experiences of Fukushima and Chernobyl show sustained and large releases of radiation for a period of several weeks. Imagine Boston or Baltimore hospitals, halls of Congress downwind, or the financial capitals in New York (and any of their complex infrastructures) bearing the brunt of a downpour with damaging winds and power outages that can last for a week, complicated by contamination that can cause death and disease for decades. The damages are something you'd rather not contemplate, I think. But think we must.

Consider the 'shelter' of Greenfield Community College only about 12 miles from the problem-plagued reactor at Vernon, Vermont. For a time the wind direction may allow it to be used for shelter, and hours later evacuees could be contaminated again. The congestion and exposure that would result, while people's cars stacked bumper to bumper on our winding rural roads would be worse than regrettable. Rolling up windows and breathing through handkerchiefs won't prevent inhalation of more than a dozen different radioactive particles, each capable of initiating a cancer.

Please consider whether the scheduling of drills should be randomly selected and suddenly announced, rather than plotted and prepared with warning, because accidents come by surprise.

At the same time that drills should be announced by surprise, the scope of planning should be much broader. More than 150,000 people evacuated near Fukushima, from as far as 25 miles away--50,000 of those, according to the Associated Press (5/16/12) evacuated from outside the mandatory evacuation zones. Meanwhile, the U.S. Nuclear Regulatory Commission and U.S. State Department recommended that Americans within 50 miles of Fukushima evacuate. Even so, as much as 80% of the airborne radiation released at Fukushima blew directly over the Pacific Ocean, rather than populated areas. The NRC cannot rely on favorable wind patterns to protect the American public.

According to the National Academy of Sciences BEIR VII report, there is no safe dose of radiation, and women and children are affected more by radiation than men. Evacuation regulations must be protective of the most vulnerable in the population.

The ingestion pathway EPZ is also grossly inadequate, and should be expanded to 100 miles. Food contamination at both Fukushima and Chernobyl has been far reaching and persistent. In Chernobyl, radionuclides tainted crops and animal products hundreds of miles away. More than 25 years after that accident, sheep in Wales--hundreds of miles away--remain interdicted. Similarly, in Fukushima contamination of rice, milk, and other food has been exhibited 100 miles and more from the site.

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What's your plan for evacuating during a snowy Nor'easter? Current NRC regulations do not require that emergency exercises take into consideration any concurrent natural disaster. Both Fukushima and the U.S. experience with Hurricane Katrina poorly evacuation plans work when severe weather causes roadways to wash out.

Our emergency preparedness drills and exercises should include regionally appropriate natural disasters such as droughts, flooding, blizzards, earthquakes, wildfires, mudslides, volcanic activity such as at Mt. St. Helen, and hurricanes.

It is for all these reasons that I request that the NRC expand emergency planning zones to 100 mile zones and add a new requirement that emergency exercises include scenarios of regionally appropriate weather and natural disasters.

Thank you,

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