

**Rulemaking Comments****PRM-50-104  
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**From:** David Agnew [gogreens@comcast.net]  
**Sent:** Monday, July 16, 2012 8:56 PM  
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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Fukushima has demonstrated that nuclear power disasters can and do have sustained and far reaching effects. A major concern associated with Fukushima and other nuclear disasters is the evacuation of affected populations. In the United States, emergency planning for nuclear emergencies has changed little in several decades. The plans are outdated and do not adequately protect the health and safety of United States citizens. We've gone from no emergency plans prior to TMI, to - it is now apparent - a facade of emergency planning.

The 10-mile EPZ does not adequately protect from the effects of ionizing radiation, despite what technocrats claim. Fukushima and Chernobyl are direct evidence that radiation releases from nuclear accidents can be far greater than the industry and its regulators are willing to imagine. Fukushima emitted large releases of radioactive material for several weeks, and smaller releases continue well over a year later.

More than 150,000 people evacuated from as far as 25 miles from Fukushima -- 50,000 of those, according to the Associated Press evacuated from outside the mandatory evacuation zones. And the NRC 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 considerably more susceptible to 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 contaminated crops and animal products many hundreds of miles away. More than 25 years later, sheep in Wales remain interdicted. In Fukushima contamination of rice, milk, and other food has occurred over 100 miles and more from the site.

Current NRC regs do not require that emergency exercises take into consideration an initiating or concurrent natural disaster that would further complicate accidents and evacuation efforts. At Fukushima, a natural disaster coupled with faulty reactor design initiated the disaster. Both Fukushima and the U.S. experience with Hurricane Katrina demonstrate the difficulties associated with evacuating when a natural disaster strikes that causes roadways to wash out.

Weather patterns are growing more extreme and dangerous. In 2011, hurricanes, earthquakes, and flooding caused damage to U.S. nuclear reactors. Therefore, emergency preparedness drills and exercises should include regionally appropriate natural disasters such as droughts, flooding, blizzards, ice storms, tornados, earthquakes, wildfires, and hurricanes.

Where I live (on Cape Cod), 200,000 people would have to travel towards the Pilgrim reactor in order to escape it's plume. Some parts of Cape Cod are as little as 12 miles from the reactor, yet there is no plan for our safety. In the summer it could be four times that

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number. Even the proposed 25-mile zone would be insufficient here, but - 40 years later - it would be a start.

For these reasons I request that the NRC adopt the proposed rule expanding emergency planning zones to the respective 25, 50, and 100 mile zones and add a new requirement that emergency exercises include scenarios of regionally plausible initiating or concurrent natural disasters.

Sincerely,

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