

Rulemaking Comments**PRM-50-104
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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Like other residents of Cape Cod, I and my family are keenly aware of the need for a basic reconsideration of the present, inadequate emergency evacuation zones around our nuclear neighbor, Pilgrim. It is just on the other side of Cape Cod bay, 23 miles from our house, and visible on a clear day. The on-going events at Fukushima demonstrate that nuclear power disasters can have sustained and far reaching effects in the area surrounding almost any nuclear plant. We Cape Codders feel a special concern about escaping from plumes of radionuclides, which Fukushima clearly showed can be highly dangerous many miles outside a 10-mile circle. In the United States, emergency planning for nuclear emergencies has remained largely static since 1980, when regulations pertaining to emergency planning were initially enacted after the Three Mile Island accident. These plans are outdated and do not adequately protect the health and safety of United States citizens.

That is particularly true for Cape Cod, especially the outer (northernmost) part where we live in Truro. The land is so narrow that there is only one passable highway, Route 6, by which we could evacuate, and only two bridges for the entire population of the whole Cape to cross to the mainland—which would put us closer to Pilgrim! Even on normal summer days, our highways are often jammed, crawling for miles before we can approach those two bottlenecks. That is just with normal seasonal increase in the population in this summer-resort region. It is difficult to imagine how it would be with expectable accidents and breakdowns from overheated engines; traffic would doubtless soon be at a complete halt. Yet existing plans, such as they are, completely ignore these very real dangers. People trying to escape would be trapped in their cars, exposed to highly dangerous amounts of air-born radiation.

We are told, therefore, that we would probably be advised to stay indoors, not try to escape but hope to minimize exposure until the emergency was over. A Hobson's choice! 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. It will be a huge challenge to devise evacuation regulations that could be protective of the most vulnerable in our population.

The existing 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 found 100 miles and more from the site.

Current NRC regulations do not require that emergency exercises take into consideration any initiating or concurrent natural disaster that might further complicate accidents and subsequent evacuation efforts. At Fukushima, a pair of natural disasters (coupled with faulty reactor design) initiated the catastrophe. 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. Massachusetts experienced multiple

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tornadoes for the first time in memory, and is undergoing serious erosion from the storm surges that are the "new normal." Emergency preparedness drills and exercises need to be fundamentally rethought, taking into account the steadily worsening severe weather caused by climate change that now is multiplying natural disasters such as droughts, flooding, blizzards, wildfires, and hurricanes. Pilgrim is also vulnerable to earthquakes.

It is for all these reasons that 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 appropriate initiating or concurrent natural disasters.

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