

Gallagher, Carol

From: aceactivists@comcast.net
Sent: Wednesday, June 18, 2014 7:50 AM
To: Gallagher, Carol
Cc: Senator Casey Kurt Imhof; Senator Toomey - Mitch Vidovich; Congressman Gerlach Scott Savatt; Congressman Dent Vincent O'domski; Senator Rafferty; Senator Dinniman; Representative Painter; Representative Vereb
Subject: ACE Comments - NRC - Emergency Preparedness - Docket ID NRC-2-14-0139

June 18, 2014

To: NRC - Draft Emergency Preparedness - Docket ID NRC-2014-0139
Federal Rulemaking

NUCLEAR REGULATORY COMMISSION [NRC-2014-0139]

ACTION: Notice of availability; request for comment, Deadline July 16, 2013

For Nuclear Regulatory Commission, Pamela Baker, Acting Deputy Director, Division of Preparedness

and Response, Office of Nuclear Security and Incident Response. FR Doc. 2014-14011 Filed 6-13-14

Comments E-Mailed to Carol Gallagher – Carol.Gallagher@nrc.gov

From: The Alliance For A Clean Environment (ACE)

aceactivists@comcast.net

The Alliance For A Clean Environment has repeatedly commented to NRC about our concerns related to NRC negligently weakening Emergency Preparedness procedures, especially as they relate to millions of people in the Greater Philadelphia Region surrounding Limerick Nuclear Plant, the 2nd most densely populated region around a nuclear plant in the U.S.

Our major concern is NRC's refusal to expand the evacuation zone to at least 50 miles to attempt to reduce radiation exposures from Limerick's radiation releases after an accident / meltdown.

Even after indisputable evidence from Chernobyl and Fukushima showing dangerous radiation releases traveled far beyond 10 miles, NRC clings to the absurd illusion that evacuation planning beyond 10 miles is not needed. Clearly people and the environment far beyond 50 miles are impacted. NRC's ex-chief even called for a 50-mile evacuation for U.S. citizens in Japan after Fukushima.

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ADD-

C. Kahler (CSK)

Fukushima and Chernobyl lessons show people far beyond 10 miles need to be evacuated, yet Limerick's evacuation plan moves people, including children from schools, to reception centers just beyond 10 miles, where vast numbers will continue to be exposed to the radioactive plume. That is indefensible.

NRC'S NEW EMERGENCY PREPAREDNESS RULES ARE UNPROTECTIVE AND UNACCEPTABLE, ALLOWING:

EMERGENCY DRILLS TO BE RUN WITHOUT PRACTICING FOR RADIATION RELEASES

FEWER EXERCISES

FEWER PEOPLE TO EVACUATE RIGHT AWAY

MANY RESPONDERS VIEW NRC'S WEAKENED RULES AS DOWNRIGHT BIZARRE.

- **NRC'S WEAKENED EMERGENCY RULES CLEARLY INCREASE RADIATION RISKS TO MANY MILLIONS OF PEOPLE THAT WOULD BE EXPOSED TO A LIMERICK RADIATION ACCIDENT/MELTDOWN.**
- **ACE STRENUOUSLY OBJECTS TO NRC'S WEAKENED RULES FOR EMERGENCY PLANNING!**

In ACE's many attempts to express our concerns to NRC, agency officials repeatedly used evasive misdirection and baseless excuses to ignore reality. There is no safe way to evacuate our densely populated region. ACE repeatedly made specific comments to one NRC official after the other with specific details about our concerns, including on Exelon's 2012 Emergency Plan for Limerick.

- **FOR DETAILS ON ACE CONCERNS AND OBJECTIONS RELATED TO NRC'S EMERGENCY PLANNING, ESPECIALLY RELATED TO LIMERICK NUCLEAR PLANT, PLEASE REFER TO OUR 2013 8-PART VIDEO-BLOG SERIES AT WWW.ACEREPORT.ORG.**

ACE contacted NRC's Carolyn Kahler, Security and Incident Response, U.S. Nuclear Regulatory Commission who referred us to another NRC official. 4-16-13, NRC's Joseph Anderson's responses failed to address our specific concerns. Shockingly, in his 4-16-13 response to ACE he admitted that NRC had no intention of reviewing Exelon's new 12-12 Emergency Plan that NRC required to be done in the first place. ACE did review Exelon's 2012 ETE, and found it to be a reckless, fatally flawed, and self-serving document. We repeatedly requested a meeting with NRC many NRC officials to meet with NRC's Emergency Planning officials to discuss the flaws. Finally, 7-20-13, NRC's Mark Thaggard responded with the offer of a meeting. We offered several dates and times, only to get NO RESPONSE.

For over a decade, since 9/11, ACE has been extremely concerned about the inability of our densely populated region to evacuate safely from a Limerick Nuclear Plant radiation accident / meltdown. Since 2001, ACE made it abundantly clear that NRC needs to improve Limerick's evacuation plans, not weaken them. Meetings ACE attended after 9/11 caused us to have more concern. We realized there would only be shelter, food, and water for a fraction of the people who would need to evacuate. Reception centers would still be in the radioactive plume. NRC officials at meetings seemed ill-informed about radiation exposures and the consequences.

It seems clear that NRC never really dealt with safe evacuation related to Limerick Nuclear Plant. It became clear that NRC should have stopped Limerick construction in 1980, five years before Limerick started operating. A 1980 public hearing on Limerick evacuation revealed that NRC knew population density within 30 miles of Limerick was DOUBLE what NRC considered safe for evacuation. TMI's 1979 evacuation triggered NRC's evacuation rule for safe evacuation to be 500 people per square miles within 30 miles of the nuclear plant. Now there are over 8 million people within 50 miles of Limerick. Philadelphia is only about 21 miles from Limerick.

- **ACE URGES NRC TO REVISE ITS EMERGENCY PLANNING RULES TO BE FAR MORE PROTECTIVE RELATED TO RADIATION EXPOSURE AFTER A NUCLEAR PLANT ACCIDENT/MELTDOWN. TENS OF MILLIONS OF PEOPLE NEED THE MOST PROTECTIVE PLAN POSSIBLE. A RADIOACTIVE DISASTER COULD HAPPEN AT LIMERICK. ACE RECENTLY DOCUMENTED MANY REASONS THERE COULD BE A SEVERE ACCIDENT/MELTDOWN AT LIMERICK. FOR EXAMPLE, LIMERICK'S REACTORS AND FUEL POOLS SIT DIRECTLY ON FAULT FRACTURES, AND ITS AGING SYSTEMS AND EQUIPMENT ARE CORRODING AND DETERIORATING AT ALARMING RATES.**
- **ACE IS REQUESTING SPECIFIC RESPONSES FROM SPECIFIC NRC OFFICIALS, TO THE ISSUES WE RAISED IN THESE COMMENTS.**