

# PUBLIC SUBMISSION

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Protective Action Recommendations for Members of the Public on Bodies of Water

**Comment On:** NRC-2015-0121-0001

Protective Action Recommendations for Members of the Public on Bodies of Water; Draft  
Regulatory Issue Summary for Comment

**Document:** NRC-2015-0121-DRAFT-0002

Comment on FR Doc # 2015-12514

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## Submitter Information

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## General Comment

See attached file(s)

## Attachments

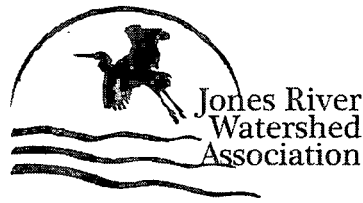
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Add= M. Humbertone (msh4)



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July 9, 2015

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Mail Stop: OWFN-12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**RE: JRWA Comments Regarding NRC Regulatory Issue Summary 2015-XX Protective Action Recommendations for Members of the Public on Bodies of Water (Docket Docket NRC-2015-0121)**

Dear Ms. Bladey,

The Jones River Watershed Association (JRWA) submits the following comments and questions regarding the NRC's June 2015 issuance of a regulatory issue summary (RIS) to clarify its position concerning licensee compliance with 10 CFR 50.47(b)(10). The RIS specifically addresses the development of protective action recommendations (PARs) for members of the public who are on bodies of water within the plume exposure pathway EPZ.

**RIS Should Require Action or Written Response**

On pages 1 and 3 of the RIS, the NRC states that no action or written response is required by addressees. However, if the NRC has identified a problem with licensee interpretation of the requirements inherent to 10 CFR 50.47(b)(10), then we strongly suggest all licensees be required to outline their PAR strategies related to bodies of water within the EPZ, and proximate locations, including a detailed map of the water bodies affected. This would ensure all licensees are interpreting the regulations correctly and uniformly, and it would allow the NRC to correct any violations.

**Varied Stakeholders on Water**

An efficient and organized communication strategy is critical for alerting the varied stakeholders who utilize bodies of water near nuclear power facilities in the U.S. For instance, there is a wide variety of stakeholders who use Cape Cod Bay and nearby harbors near Entergy's Pilgrim Nuclear Power Station in Plymouth, Mass. In addition to the general public, there are varied commercial fishing operations (finfishing, lobster fishing, fishing charters, groundfish, scallop dredging, etc.), commercial ferry services, aquaculture operations, tourism excursions (including whale watching), and industrial activities taking place in Cape Cod Bay and nearby waters.

There are also commercial and recreational activities that take place in the Cape Cod Canal and on Stellwagen Bank National Marine Sanctuary, which can and do pass through Cape Cod Bay in transit, which should also be included in emergency plans. While these locations may fall outside Pilgrim's EPZ, some of these vessels may transit through the EPZ on their way back to port or to reach another destination.

## Seasonality Should be Considered

It's important to note that stakeholders and usage in Cape Cod Bay and surrounding waters near Pilgrim – and likely other nuclear facilities - vary seasonally. Approximately six million tourists visit Cape Cod each year and Massachusetts is the eighth most popular U.S. destination for international travelers – much of this is marine-based tourism. An effective communication strategy and plan of action could vary by season, and should be taken into consideration by the NRC and Entergy.

It is also important to note that the Town of Plymouth is launching a major tourism event of national and international significance to celebrate its 400th anniversary. This multi-year event is expected to dramatically increase the number of visitors to the Plymouth area in 2020 (and in the years leading up to as well as after the main event), and will include international boating events – meaning a significant increase in the number of people who are on the water within Pilgrim's plume exposure pathway EPZ.

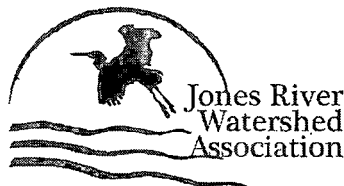
An estimated 6 million visitors are expected travel to the Town of Plymouth in the year 2020 alone.<sup>1</sup> The Plymouth 400 non-profit organization, the Town of Plymouth, the State of Massachusetts, and the federal government are currently working to make changes to transportation and infrastructure to support the large influx of visitors.

Pilgrim and other nuclear facilities in the U.S. must be required to review and update all emergency plans in conjunction with community and regional events, such as Plymouth's 400<sup>th</sup> anniversary; that can greatly increase the number of people on the water within the EPZ who could be impacted, and who have little to no knowledge of the threat of a radioactive accident.

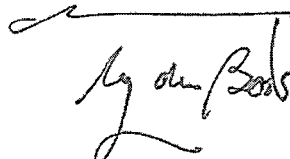
Regular and systematic updates (e.g., every 6 months) are needed for water-based emergency plans to keep pace with changing social and community needs, as well as seasonal stresses.

## Local Input and Review

Emergency plans for members of the public on bodies of water within the plume exposure pathway EPZ should be available for local input and review, since the communities hosting nuclear power facilities understand their needs, future plans, social changes, and seasonal stresses better than anyone.



Sincerely,



Pine duBois  
Executive Director

<sup>1</sup> an estimation based upon the Massachusetts Office of Travel and Tourism and Plymouth County Convention and Visitors Bureau's statistics