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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

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General Comment

See attached file(s)

Attachments

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SUNSI Review Complete

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Docket No. NRC 2015-0121

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Washington, DC 20555-0001

RE: Pilgrim Watch & The Town of Duxbury Nuclear Advisory Committee 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)

Pilgrim Watch and the Town of Duxbury Nuclear Advisory Committee comment in support of the RIS' (ML15022A610) conclusion that:

Compliance with 10 CFR 50.47(b)(10), requires that PAR development strategies are in place for all areas within the plume exposure pathway EPZ, and that the capability exists for PARs to be made, in the event of an emergency, to protect the health and safety of all members of the public within the plume exposure pathway EPZ. Because the NRC's regulations and guidance have never excluded bodies of water within the plume exposure pathway EPZ from PAR development, bodies of water within the plume exposure pathway EPZ are required to be included in PAR development. The NRC has determined that the requirement to include bodies of water in PAR strategies may not be clearly understood by all licensees. The NRC is issuing this RIS to remind addressees to establish and maintain PAR strategies for all areas within the plume exposure pathway EPZ in accordance with the regulation and their licensing basis.

The need for protective action exists irrespective of whether members of the public are on the water or land. In fact, if the public is on the water, boats provide little to zero dose reduction capability; and the time it will take to seek shelter/evacuate is longer than if the public is on land, especially if the boat does not have a motor and is dependent on wind.

Waters surrounding nuclear reactors are used for commercial and recreational purposes; and in some areas the population on the water is substantial. Annually peak numbers need to be calculated. If use of the waters is largely seasonal, two sets of statistics should be kept, one for off-season and another for peak season.

Accurate Evacuation Time Estimates for the population on the water must be part of the KLD ETEs. For example the most recent KLD ETE for Pilgrim Station was not credible. The ETE incorrectly assumes that boaters will return to marinas within the mobilization time for transients

in the EPZ (15 minutes). This ignores the time required for sail boats without motors to get back to their moorings and ashore and the effect of low tides. KLD 2004 (section 5-11) in contrast found at 15 minutes only 15% of those on boats were notified; and at 15 minutes only 17% of the boaters were ready to evacuate. It took 60 minutes for 100% to be ready to evacuate. The boating population has increased substantially since 2004; it makes no sense that the times to evacuate gone down.

Some Lessons Learned

Radiological Emergency Plans and Procedures must be fully developed for federal, state and local authorities.

Key Responsible Agencies

The Harbormaster and the Coast Guard are the key responsible agencies. Regarding the Coast Guard, it is important that the Memoranda of Understanding between the Coast Guard and the State Emergency Management Agency is updated annually so that there is clarification of the role and Responsibilities of the Coast Guard and how many boats will be available. Is the CG limited to providing traffic and access control to the EPZ and assisting the notification of boaters? Specifically will the Coast Guard limit its responsibilities to outside the EPZ or will they assist inside the EPZ - what specific roles will they play? The CG crew requires training and PPE, including Potassium Iodide, 3-M masks and an understanding that all portions of skin should be covered with clothing as a precautionary measure.

Comment on Related Agencies

State Department of Public Health: If the department declares that an area including any boaters has been contaminated, all boaters in that area should be considered to have been contaminated and the proper actions should be taken on that basis.

Local Police Departments: Notify boaters at landings that there is an emergency and not to launch; provide traffic control to harbor areas; assure boaters do not attempt to trailer their boats out of the area. Removing boats by trailer will delay/impede vehicle traffic.

Local Department Public Works: Provide barricades and signage to landing areas

Local Public Safety Dispatcher: provide notification to Harbormaster and others listed on waterfront

Local Launch Operators: Assist picking up boats once they are moored or occupants on boats unable to get to a mooring in a timely manner

Local Transportation Officer: Arrange transportation for transportation dependent

Local Dosimetry Coordinator: Coordinate and provide dosimetry, KI, PPE to waterfront personnel.

Notification

Describe administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs. (Section IV.D.1 of Appendix E to 10 CFR Part 50) Include for example: Harbormasters; Marine Schools on the Waterfront; Private Clubs and Marinas; private launch operators.

Notification occurs at the Alert to clear the waters. This is important in recognition of the longer time that is required to get those on the water ashore. However recognize that this will alert the land population that there is trouble at the nuclear reactor and prepare for an earlier "voluntary evacuation."

Establish a message to be read such as "This is the Harbormaster (staff). There is an emergency at the Pilgrim Nuclear Power Station. Please clear these waters. Tune to your radio for further information." At the later stages in the accident add to the message, "We advise that you cover your mouth and exposed skin with available clothing to decrease exposure; advise any others on board to go below, if possible."

Launch Operations

Notification and Launch operators are key players to get people off the water. Therefore Memorandums of Understanding (MOUs) must be made with the operators on an annual basis. The number of operators and the maximum number of boats on the water need to be part of the Evacuation Time Estimates calculated. Operators require training and PPE.

Training

Annual training should be offered to the directors and permanent staff of all waterfront groups and they in turn will be responsible to train any part-time or seasonal staff.

Pre-designated Harbors of Refuge

For those on the water in the EPZ, but outside the main harbor, a pre-designated harbor of refuge must be assigned. It should have adequate capacity and located outside the EPZ- along the model

of Reception Centers, on land. Transportation should be arranged to the Reception Center for monitoring, decontamination, as required, re-unification with family and service of other needs as required.

Recovery and Return

Clarification is required for what agency is responsible for cleanup (NRC, EPA, DHS, other); who pays for damages and cleanup; how is contamination in waterways removed; who is responsible for waste removal and where realistically are contaminated materials expected to go? These questions cannot be avoided any longer. The public and local municipalities deserve straight answers.

Respectfully submitted, July 10, 2015

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