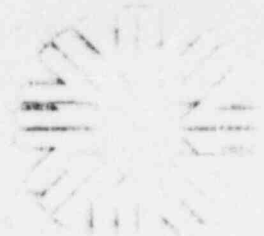


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Statement



RE: Boston Edison Company et al Pilgrim Nuclear Generating Station Unit 2
Docket # 50-471

Presented to the Nuclear Regulatory Commission, Atomic Licensing and Safety Board,
by Judy Shope, Energy Specialist, League of Women Voters of Massachusetts,
October 4, 1979.

The League of Women Voters of the United States has just completed a study of energy sources and the role of government in meeting energy needs. The results of this study form the position of the 136,000 members of the League in the United States, of whom 10,000 are residents of Massachusetts. In our study, we concluded that the nation's reliance on nuclear fission should not be increased. Rather, special attention must be focused on health and safety issues, ranging from the dangers of nuclear accidents to the problem of long-range storage of nuclear waste. In fact, we have supported a six-month moratorium on the issuance of new construction licenses for commercial reactors so that reviews and investigations sparked by the Three Mile Island accident could be properly evaluated.

Because of our concern over health and safety issues, we are particularly interested in the Pilgrim emergency preparedness plans. While we applaud the NRC decision requiring Boston Edison to enlarge its initial evacuation zone, we feel strongly that the proposed 10 mile evacuation zone is insufficient.

An effective evacuation of those within even a ten-mile zone will be difficult if not impossible to accomplish within the one-hour time frame recommended by the NRC-EPA Task Force. A ten-mile zone could easily involve evacuation of over 100,000 people, especially taking into account wind shifts which could be quite rapid. We question whether evacuation could be smoothly accomplished without previous public participation in radiological emergency response drills including actual evacuation practice. We urge such drills be required. The one-hour time frame makes no allowances for weather conditions such as snow or rain storms, time of day, traffic conditions, or tourist crowds, and of all of which could seriously hamper effective evacuation.

Yet depending on specific wind patterns and weather conditions at the time of an accident - the potentially impacted area could easily range from 18-50 miles. The Cape Cod area could be directly affected in a class 9 accident. Evacuation of Cape Cod would be especially problematic and certainly would require the most careful consideration and detailed advance planning in order to avoid the possibility of having large numbers of residents and tourists trapped in traffic jams on crowded roads or forced to travel past the stricken reactor. Since all of Cape Cod is served by only two bridges, we question whether an effective land evacuation plan can be devised for this area. Evacuating people by sea involves complicated logistics and further difficulties, but ignoring these problems does not make them disappear.

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As a further precaution we urge authorities to stockpile special drugs to block the effect of radiation on the thyroid gland. These drugs should be placed at scattered locations over a fifty-mile radius since prompt administration of the drugs could be crucial.

We are disturbed by the NRC guidelines which give utilities the responsibility for notifying both civil defense authorities and the public. Misguided optimism, financial considerations, reluctance to admit failure could all lead to crucial delays in notification and possible evacuation. An objective authority concerned mainly with the health and safety impact on the citizenry would be more trustworthy.

The League strongly believes that public understanding and participation in decision-making are essential ingredients of successful energy policy. We question whether the single hour allotted to public comment constitutes adequate participation given the complexities and seriousness of the issues involved.