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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0225

Emergency Preparedness Requirements for Small Modular Reactors and Other New Technologies

**Comment On:** NRC-2015-0225-0071

Emergency Preparedness for Small Modular Reactors and Other New Technologies; Proposed Rule

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## General Comment

Revising rules on emergency preparedness for small modular reactors is a great idea. Current evacuation policies are far too restrictive and the result is that, along with other restrictive regulations, these rules have worked to choke off nuclear power plant development in the US.

A sad case is that of the Shoreham NPP on Long Island. Completed but never operational due to evacuation rules that were overblown and that didn't seem to draw on the historical record of U.S. NPP's. In many years of operation, US NPPs experienced one major accident at Three Mile Island an accident that injured no one, but which led to an outsized public fear. The result were rules that required the entire population of eastern Long Island to be evacuated instantly given any issue at Shoreham. Even though, based on the industry's track record, the chance of an accident was vanishingly small and should one occur, the likely risk of catastrophic radiation release was even smaller. There would have been no need for such an evacuation. As a result of restrictive rules, an NPP that could have "...prevented the emission of an estimated three million tons of carbon dioxide per year, according to journalist Gwyneth Cravens" ([https://en.wikipedia.org/wiki/Shoreham\\_Nuclear\\_Power\\_Plant](https://en.wikipedia.org/wiki/Shoreham_Nuclear_Power_Plant)) never contributed

electricity to the grid.

Given the need to reduce carbon emissions to prevent the worst effects of global warming, the new SMR designs should be given reasonable latitude to operate without highly restrictive emergency rules.