

**From:** [Ann Morgan](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2020-0101: Do Not Weaken Emergency Preparedness for Nuclear Reactors and Other Nuclear Facilities--Strengthen it!  
**Date:** Tuesday, July 21, 2020 4:50:10 PM

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Nuclear Regulatory Commission (EPZs)

RE: Docket ID NRC-2020-0101: Do Not Weaken Emergency Preparedness for Nuclear Reactors and Other Nuclear Facilities--Strengthen it!

Dear ,

Commissioners and Staff of the Nuclear Regulatory Commission:

I do know what emergency preparedness looks like. Years ago in San Luis Obispo, CA the university had a realistic and workable plan to evacuate the student body should Diablo Canyon Nuclear Power plant ever require an evacuation. Times have changed, but have only become more urgent.

I am writing in opposition to the U.S. Nuclear Regulatory Commission's proposed rule change, docketed in the Federal Register (NRC-2020-0101), to reduce the emergency preparedness requirements for small modular reactors, "other new technologies," and production and utilization facilities.

The scope of this rulemaking could potentially affect millions of people. Because of the COVID19 Pandemic, many people do not have the time to engage and review it right now. In light of this reality, I strongly encourage NRC to extend the comment period to 6 months after the end of the COVID-19 crisis.

NRC is proposing to eliminate the requirement of dedicated minimum Emergency Planning Zones (EPZs) for the above-referenced facilities, and for site-specific Emergency Response Plans that must be reviewed and approved by the FEMA. Emergency planning requirements have been a bedrock of nuclear safety regulation for over 40 years, since the Three Mile Island disaster proved that large releases of radiation were possible. And, emergency planning requirements for nuclear facilities will be more essential than ever due to climate change. Natural disasters that could cause nuclear emergencies, as well as complicate emergency response plans, are increasing in both severity and frequency.

Emergency planning is part of the social contract for commercial nuclear facilities. It is the very last line of defense to protect public health and safety when safety regulations, reactor designs, defense-in-depth, and NRC oversight fail. Then, the public bears the ultimate risk from a nuclear disaster.

In practice, NRC's current emergency planning requirements under 10 CFR 50.33 have been demonstrated to be inadequate in real-world situations. They should be made more stringent, not less, and not based solely on calculations of risk.

It is absurd for the NRC to assume that license applicants for new reactor designs should be able to exempt themselves from emergency planning requirements solely on the basis of risk calculations. NRC has no experience regulating many potential reactor designs. The NRC is opening the door for reactors of any size, design, and vintage to reduce or eliminate emergency planning.

NRC appears to be subjugating its prime responsibility to protect the public health and safety under the Atomic Energy Act as amended in 1975 to industry financial interests in lightened regulatory burden and streamlined licensing procedures. The public can have no confidence in this proposed regulation, and it must be rejected.

Sincerely,  
Ann Morgan

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