

**From:** [Tamadhur Al-Aqeel](#)  
**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 11:55:15 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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Sincerely,  
Tamadhur Al-Aqeel

CA 90035  
(310) 838-1830

**From:** [Mary Landrum](#)  
**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 11:54:50 AM

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Sincerely,  
Mary Landrum

KY 42134  
(270) 253-3955

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**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 11:54:37 AM

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Sincerely,  
Jeffrey Knopf

MA 01002  
(413) 256-6366

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**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 11:54:28 AM

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Gregory Freeman

AZ 85625



**From:** [Pat Pollard](#)  
**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 11:54:16 AM

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OH 43119  
(614) 875-6625

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**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 11:54:14 AM

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harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Diana Heymann

CT 06110  
(860) 200-8525

**From:** [ann Malyon](#)  
**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 11:53:48 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
ann Malyon

NJ 07436  
+15555555555

**From:** [JERRY WHEELER](#)  
**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 11:53:32 AM

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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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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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,  
JERRY WHEELER

WA 98168  
(206) 242-9344



**From:** [Julia Radwany](#)  
**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 11:52:45 AM

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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:

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Sincerely,  
Julia Radwany

OH 44333  
(330) 666-8201

**From:** [Francine Schwarzenberger](#)  
**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 11:52:27 AM

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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 ,

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Sincerely,  
Francine Schwarzenberger

CO 80212  
(303) 922-2997

**From:** [Gerald Stein](#)  
**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 11:52:18 AM

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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!

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Gerald Stein

FL 32605  
(352) 384-1155

**From:** [Peggy Stone](#)  
**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 11:52:05 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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.

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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,  
Peggy Stone

CA 92101  
(619) 696-7325



**From:** [Colin Kay](#)  
**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 11:51:48 AM

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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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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.

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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,  
Colin Kay

IL 60477  
(708) 508-0351

**From:** [Linda Wright](#)  
**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 11:51:44 AM

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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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Linda Wright

WA 98121  
(206) 551-3053

**From:** [Vi Mooberry](#)  
**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 11:51:44 AM

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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:

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Sincerely,  
Vi Mooberry

CA 92029  
(619) 548-5075

**From:** [David Damstrom](#)  
**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 11:51:33 AM

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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:

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Sincerely,  
David Damstrom

WA 98117  
(712) 260-4196



**From:** [Suzanne Carlson](#)  
**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 11:51:23 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Suzanne Carlson

MA 01302  
(413) 774-4120

**From:** [Sandra Sobek](#)  
**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 11:51:20 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Sandra Sobek

MA 01341  
(413) 369-4097

**From:** [Anne Rosati](#)  
**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 11:50:48 AM

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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!

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Sincerely,  
Anne Rosati

ME 04103  
(919) 383-0777

**From:** [Dev Klein](#)  
**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 11:50:44 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Dev Klein

IL 60015  
(847) 948-5142



**From:** [Elizabeth Hickman](#)  
**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 11:49:28 AM

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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!

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Sincerely,  
Elizabeth Hickman

WA 98092  
(253) 576-8435

**From:** [Nicole Crane](#)  
**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 11:49:07 AM

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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!

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Nicole Crane

NY 10566

**From:** [Jean Hodgins](#)  
**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 11:48:36 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Jean Hodgins

NY 12020  
(518) 885-8773

**From:** [Ronald Partridge](#)  
**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 11:48:21 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Ronald Partridge

CA 93063  
(805) 990-1560



**From:** [Jonathan Evans](#)  
**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 11:48:17 AM

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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:

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Sincerely,  
Jonathan Evans

TN 37383  
(931) 308-3280

**From:** [Kay Hawkle](#)  
**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 11:48:14 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Kay Hawkle

AZ 86336  
(432) 703-0007

**From:** [Helen Johns](#)  
**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 11:48:08 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Helen Johns

ot SA16 0EG  
07941981426

**From:** [John Steponaitis](#)  
**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 11:48:01 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
John Steponaitis

CA 94109  
(999) 999-9999



**From:** [Donna Hreha](#)  
**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 11:47:50 AM

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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:

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Sincerely,  
Donna Hreha

NY 11377

**From:** [Daviann McClurg](#)  
**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 11:47:33 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Daviann McClurg

KS 67401  
(785) 825-4067

**From:** [Barbara Smith](#)  
**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 11:46:28 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Barbara Smith

TN 38571  
(248) 228-4797

**From:** [June Adler](#)  
**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 11:45:43 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
June Adler

TX 79830  
(432) 837-0157



**From:** [Alan Ticotsky](#)  
**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 11:44:55 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Alan Ticotsky

MA 02421

**From:** [melissa elbrecht](#)  
**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 11:44:36 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
melissa elbrecht

OH 45005

**From:** [Seth Mirsky](#)  
**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 11:43:39 AM

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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:

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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.

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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, that ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Seth Mirsky

ME 04578

**From:** [Mark Daniels](#)  
**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 11:43:11 AM

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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!

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Sincerely,  
Mark Daniels

WA 98122  
(206) 328-1006



**From:** [s\\_peirce](#)  
**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 11:42:42 AM

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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:

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Sincerely,  
s peirce

CO 80540  
(303) 823-5913

**From:** [Robert Reece](#)  
**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 11:42:19 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Robert Reece

TX 75209  
(214) 363-4291

**From:** [Robin Kory](#)  
**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 11:42:08 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Robin Kory

OR 97007  
(808) 276-6302

**From:** [ELIZABETH BRYANT](#)  
**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 11:42:07 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
ELIZABETH BRYANT

ID 83642  
(208) 287-8255



**From:** [Len Clark](#)  
**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 11:41:58 AM

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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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Len Clark

RI 02818  
(401) 885-2463

**From:** [Howard Cohen](#)  
**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 11:41:55 AM

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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 am writing as a citizen and a physicist in strong opposition to the U.S. Nuclear Regulatory Commission's proposed and dangerous 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be categorically rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career,

community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Howard Cohen

CA 94306  
(650) 555-1212

**From:** [Victoria DeSarno](#)  
**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 11:41:06 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Victoria DeSarno

CT 06824  
(000) 000-0000

**From:** [Jim Pounds](#)  
**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 11:40:04 AM

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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 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.

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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,  
Jim Pounds

MN 55421  
(612) 554-5835



**From:** [David BUTLER](#)  
**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 11:39:43 AM

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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:

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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Sincerely,  
David BUTLER

TN 37076  
(615) 874-8253

**From:** [Nora Reid-leZotte](#)  
**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 11:39:20 AM

---

Nuclear Regulatory Commission (EPZs)

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

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Sincerely,  
Nora Reid-leZotte

MI 49006  
(269) 342-2034

**From:** [K Krupinski](#)  
**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 11:39:18 AM

---

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 ,

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Sincerely,  
K Krupinski

CA 90042  
(213) 804-2888

**From:** [K R Garland PhD DD](#)  
**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 11:38:55 AM

---

Nuclear Regulatory Commission (EPZs)

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Sincerely,  
K R Garland PhD DD

NM 88061  
(575) 956-8302



**From:** [K R Garland PhD DD](#)  
**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 11:38:55 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
K R Garland PhD DD

NM 88061  
(575) 956-8302

**From:** [joan langue](#)  
**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 11:38:46 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
joan langue

NY 10012  
(212) 777-1855

**From:** [Mark Wheeler](#)  
**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 11:38:11 AM

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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!

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Mark Wheeler

OR 97215  
(503) 819-5336

**From:** [Marilyn Kaggen](#)  
**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 11:38:02 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Marilyn Kaggen

NY 11230  
(718) 434-4375



**From:** [Don Preister](#)  
**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 11:37:29 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Don Preister

NE 68157  
(402) 733-6660

**From:** [Roger Lippman](#)  
**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 11:37:26 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Roger Lippman

WA 98144  
(206) 329-1906

**From:** [Patricia Kendall](#)  
**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 11:37:14 AM

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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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Patricia Kendall

NH 03264  
(603) 537-4222

**From:** [Steve Shapiro](#)  
**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 11:37:07 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Steve Shapiro

MD 21214



**From:** [Shari Kelts](#)  
**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 11:36:45 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Shari Kelts

MO 63122  
(314) 601-1638

**From:** [Nicholas Patton](#)  
**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 11:36:28 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Nicholas Patton

MO 65201

**From:** [Dorothy Sanchez](#)  
**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 11:36:19 AM

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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 ,

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Sincerely,  
Dorothy Sanchez

CO 81201  
(719) 539-2414

**From:** [Doro Reeves](#)  
**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 11:35:58 AM

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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 ,

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Sincerely,  
Doro Reeves

OR 97420



**From:** [Lisa Schwartz](#)  
**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 11:35:50 AM

---

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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Lisa Schwartz

FL 33467  
(561) 255-1615

**From:** [Dipl. Des. Kai Heinrich](#)  
**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 11:35:50 AM

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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 ,

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Sincerely,  
Dipl. Des. Kai Heinrich

ot 30451

**From:** [Guy Zahller](#)  
**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 11:35:08 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Guy Zahlner

CA 95003  
(555) 555-5555

**From:** [Stephen Nickels](#)  
**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 11:34:48 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Stephen Nickels

IL 62985  
(270) 908-5050



**From:** [Diane Rencher](#)  
**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 11:34:07 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Diane Rencher

MI 49525  
(616) 550-9954

**From:** [Dori Grasso](#)  
**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 11:33:43 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Dori Grasso

MD 21030  
(410) 555-5555

**From:** [William Blair](#)  
**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 11:33:03 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
William Blair

ID 83709  
(208) 378-8102

**From:** [Gloria Sennert](#)  
**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 11:32:33 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Gloria Sennert

MO 63015  
(636) 257-9061



**From:** [Rob Kulakofsky](#)  
**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 11:31:44 AM

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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:

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Sincerely,  
Rob Kulakofsky

AZ 85713  
(520) 624-4401

**From:** [Bonita Shea](#)  
**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 11:31:37 AM

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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 ,

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Sincerely,  
Bonita Shea

MO 65773  
(417) 999-9999

**From:** [Tracey Bonner](#)  
**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 11:31:22 AM

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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 ,

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Sincerely,  
Tracey Bonner

TX 76014  
(817) 965-4424

**From:** [Erik Nielsen](#)  
**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 11:31:08 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Erik Nielsen

VT 05036  
(802) 276-9906



**From:** [Michael Mannion](#)  
**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 11:30:23 AM

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Nuclear Regulatory Commission (EPZs)

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Michael Mannion

NY 10024  
(212) 721-6785

**From:** [Daniel Weiss](#)  
**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 11:30:01 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Daniel Weiss

VT 05401  
(802) 862-0697

**From:** [Kathleen Mireault](#)  
**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 11:30:00 AM

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Sincerely,  
Kathleen Mireault

MA 02130  
(617) 522-5759

**From:** [Jodi Rodar](#)  
**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 11:29:46 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Jodi Rodar

MA 01002  
(413) 256-8649



**From:** [Linda Lane](#)  
**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 11:29:03 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Linda Lane

FL 33445  
561-330=9858

**From:** [Doree Christensen](#)  
**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 11:28:58 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Doree Christensen

AZ 86331

**From:** [kevin Bennett](#)  
**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 11:28:46 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
kevin Bennett

PA 18707

**From:** [Rebecca Rose](#)  
**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 11:28:44 AM

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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:

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Sincerely,  
Rebecca Rose

NM 88011  
(575) 571-1345



**From:** [Linda Park](#)  
**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 11:28:43 AM

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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:

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Sincerely,  
Linda Park

OH 44112  
(216) 851-0968

**From:** [James Hartley](#)  
**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 11:28:22 AM

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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:

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Sincerely,  
James Hartley

VA 22207  
(703) 534-7998

**From:** [Sr. Sharon Zayac](#)  
**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 11:28:10 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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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,  
Sr. Sharon Zayac

IL 62670  
(217) 787-6927

**From:** [Pamela Nordhof](#)  
**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 11:28:10 AM

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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!

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Sincerely,  
Pamela Nordhof

MI 49419  
(269) 751-8291



**From:** [Mari Mennel-Bell](#)  
**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 11:27:41 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Mari Mennel-Bell

FL 33304  
(954) 563-5678

**From:** [Lorraine Moore](#)  
**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 11:27:40 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Lorraine Moore

TX 78210  
(210) 225-1111

**From:** [Myra Toth](#)  
**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 11:27:37 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Myra Toth

CA 93024  
(805) 646-7752

**From:** [lori jo siegel](#)  
**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 11:27:37 AM

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Nuclear Regulatory Commission (EPZs)

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
lori jo siegel

NY 10520  
(914) 271-2638



**From:** [Alicia Salazar](#)  
**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 11:27:21 AM

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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:

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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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Alicia Salazar

CA 90063  
(323) 351-5647

**From:** [James Monroe](#)  
**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 11:27:09 AM

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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 ,

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Sincerely,  
James Monroe

CA 94521  
(925) 969-0808

**From:** [Daniel L. Harris](#)  
**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 11:27:00 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Daniel L. Harris

NY 11763  
(631) 447-2091

**From:** [G. John Balogh](#)  
**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 11:26:35 AM

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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!

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Sincerely,  
G. John Balogh

NC 28734



**From:** [Sarah Cooke](#)  
**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 11:25:59 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Sarah Cooke

WA 98125  
(206) 368-5430

**From:** [Lesley Pleasant](#)  
**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 11:25:53 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Lesley Pleasant

IN 47714  
(812) 488-2967

**From:** [Paula Boardman](#)  
**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 11:25:45 AM

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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!

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Paula Boardman

LA 70437  
(985) 796-9292

**From:** [Loretta Larkin](#)  
**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 11:25:43 AM

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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!

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Sincerely,  
Loretta Larkin

NJ 07304  
(111) 111-1111



**From:** [Mary Peterson](#)  
**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 11:25:35 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Mary Peterson

OR 97365  
(541) 574-8221

**From:** [Gloria Diggle](#)  
**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 11:25:33 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Gloria Diggle

FL 32038  
(386) 454-8247

**From:** [Jane Cates](#)  
**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 11:25:23 AM

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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!

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Jane Cates

TX 78646

**From:** [Marjorie Clisson](#)  
**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 11:25:06 AM

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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:

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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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Marjorie Clisson

ot 56390  
(029) 761-4304



**From:** [Gerry Archibald](#)  
**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 11:24:47 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Gerry Archibald

AR 72714  
(479) 855-4994

**From:** [Susan Morris](#)  
**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 11:24:00 AM

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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!

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Sincerely,  
Susan Morris

MA 01262  
(413) 298-7006

**From:** [Liz Baum](#)  
**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 11:23:52 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Liz Baum

MO 65804  
(417) 882-6477

**From:** [Lara Miletta](#)  
**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 11:22:47 AM

---

Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Lara Miletta

MA 01453



**From:** [William Hassig](#)  
**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 11:22:40 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
William Hassig

IL 60056  
(847) 398-1057

**From:** [Cindy Beckkey](#)  
**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 11:20:59 AM

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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!

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Cindy Beckkey

CA 94619  
(510) 698-4636

**From:** [Michelle Carter](#)  
**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 11:20:57 AM

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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!

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Sincerely,  
Michelle Carter

CA 94110  
(415) 989-4800

**From:** [Stan Blecher](#)  
**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 11:20:56 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Stan Blecher

ON L1A0A3



**From:** [patrick donaldson](#)  
**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 11:20:54 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
patrick donaldson

OR 97213  
(503) 230-2081

**From:** [Ellen Rice](#)  
**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 11:20:42 AM

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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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Ellen Rice

ME 04011  
(207) 406-2501

**From:** [Allan Glick](#)  
**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 11:20:37 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Allan Glick

CA 92128  
(619) 253-3045

**From:** [molly brewer](#)  
**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 11:20:30 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
molly brewer

WI 53209  
(414) 358-0223



**From:** [John Six](#)  
**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 11:20:15 AM

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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 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.

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Sincerely,  
John Six

PA 17057  
(717) 616-8360

**From:** [John Liss](#)  
**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 11:19:51 AM

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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 ,

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Sincerely,  
John Liss

ON M5S2m4  
(416) 968-0000

**From:** [Michael 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 11:19:43 AM

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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 ,

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Sincerely,  
Michael Morgan

NC 28778  
(828) 686-5962

**From:** [Leslie Gold](#)  
**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 11:19:38 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Leslie Gold

NY 10014  
(212) 966-7728



**From:** [Sandy Sage](#)  
**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 11:19:35 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Sandy Sage

OK 73461  
(940) 230-5250

**From:** [P. A. Paye](#)  
**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 11:19:31 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
P. A. Paye

VT 05051  
(802) 222-4664

**From:** [Allan Walters](#)  
**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 11:19:27 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Allan Walters

PA 19119  
(215) 247-7276

**From:** [Elinor Weiss](#)  
**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 11:19:01 AM

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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!

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Sincerely,  
Elinor Weiss

NY 14051  
(716) 741-3360



**From:** [Marji Mendelsohn](#)  
**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 11:18:59 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Marji Mendelsohn

OH 45215  
(513) 931-1916

**From:** [Geraldine Aird](#)  
**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 11:18:28 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Geraldine Aird

NY 13066  
(315) 446-0013

**From:** [Jean Claude Louhisdon](#)  
**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 11:18:27 AM

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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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Jean Claude Louhisdon

CT 06106

**From:** [Michael Abler](#)  
**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 11:18:22 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Michael Abler

CA 95062  
(831) 555-5555



**From:** [Ross Lockridge](#)  
**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 11:18:21 AM

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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 too 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.

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Sincerely,  
Ross Lockridge

NM 87010  
(505) 471-9182

**From:** [linda rucci](#)  
**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 11:18:09 AM

---

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 ,

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Sincerely,  
linda rucci

FL 32225

**From:** [Carolyn Riddle](#)  
**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 11:18:05 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Carolyn Riddle

TX 78758  
(509) 488-5074

**From:** [Jennifer Kopczynski](#)  
**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 11:18:02 AM

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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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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Sincerely,  
Jennifer Kopczynski

CA 91360



**From:** [clark crowe](#)  
**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 11:18:02 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
clark crowe

MI 48206  
(313) 974-1642

**From:** [Alice Vedova](#)  
**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 11:17:42 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Alice Vedova

MD 20860  
(301) 570-1020

**From:** [Christina Babst](#)  
**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 11:17:37 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Christina Babst

CA 90069  
(310) 274-2963

**From:** [Margaret Wessels](#)  
**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 11:17:34 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Margaret Wessels

CA 95003



**From:** [Robin Dash](#)  
**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 11:17:33 AM

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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:

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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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Robin Dash

MA 02143  
(617) 686-0196

**From:** [Regene silver](#)  
**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 11:17:26 AM

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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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Regene silver

PA 19096  
(610) 642-5247

**From:** [Regene silver](#)  
**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 11:17:25 AM

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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:

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Sincerely,  
Regene silver

PA 19096  
(610) 642-5247

**From:** [Lynda LaHue](#)  
**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 11:16:51 AM

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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 ,

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Sincerely,  
Lynda LaHue

CA 91356  
(818) 343-5856



**From:** [Lynda LaHue](#)  
**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 11:16:50 AM

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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 ,

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Sincerely,  
Lynda LaHue

CA 91356  
(818) 343-5856

**From:** [Kim Bigley](#)  
**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 11:16:50 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Kim Bigley

TX 77009  
(713) 863-8231

**From:** [Lynda LaHue](#)  
**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 11:16:47 AM

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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!

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Lynda LaHue

CA 91356  
(818) 343-5856

**From:** [Marian Ronan](#)  
**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 11:16:46 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Marian Ronan

NY 11218  
(347) 240-7945



**From:** [Helen Stuehler](#)  
**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 11:16:30 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Helen Stuehler

NV 89508  
(775) 972-7917

**From:** [leona klerer](#)  
**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 11:16:26 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
leona klerer

CT 06902  
(203) 323-2069

**From:** [Victoria Sepulveda](#)  
**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 11:15:48 AM

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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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Victoria Sepulveda

NM 87539  
(505) 901-1803

**From:** [ruth lovinsohn](#)  
**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 9:23:33 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
ruth lovinsohn

NC 28711  
(828) 407-7159



**From:** [ruth lovinsohn](#)  
**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 9:23:28 AM

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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 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.

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Sincerely,  
ruth lovinsohn

NC 28711  
(828) 407-7159

**From:** [David Henning](#)  
**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:** Monday, July 20, 2020 12:54:22 AM

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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 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.

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Sincerely,  
David Henning

WI 54449  
(715) 676-2555

**From:** [Tara Mae](#)  
**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:** Sunday, July 19, 2020 11:59:08 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 ,

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Sincerely,  
Tara Mae

NY 11790  
(516) 555-5555

**From:** [Dorothy Johnson](#)  
**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:** Sunday, July 19, 2020 3:22:26 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:

As a Registered Nurse concerned about public health and safety and the environment, 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.

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Sincerely,  
Dorothy Johnson

VA 20121  
(703) 266-4466



**From:** [David Ellison](#)  
**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:** Sunday, July 19, 2020 2:00:57 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
David Ellison

OH 44113  
(216) 631-0557

**From:** [Carol Gay](#)  
**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:** Sunday, July 19, 2020 12:50:28 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 ,

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Carol Gay

NJ 08724  
(732) 785-1503

**From:** [Robert Kolkebeck](#)  
**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:** Sunday, July 19, 2020 7:25:55 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Robert Kolkebeck

IL 60466  
(708) 748-0762

**From:** [Joseph Quirk](#)  
**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:** Saturday, July 18, 2020 6:22:07 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Joseph Quirk

NY 10009  
(212) 555-1212



**From:** [Elena Rumiantseva](#)  
**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:** Friday, July 17, 2020 7:27:50 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Elena Rumiantseva

WA 98115  
(206) 789-1408

**From:** [A. McGarry](#)  
**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:** Friday, July 17, 2020 4:52:03 PM

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Nuclear Regulatory Commission (EPZs)

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
A. McGarry

MI 48180  
(248) 838-9232

**From:** [k. Bensusen](#)  
**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:** Friday, July 17, 2020 2:17:47 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
k. Bensusen

NM 87529  
(575) 613-0774

**From:** [Sharon Wilensky](#)  
**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:** Thursday, July 16, 2020 6:55:21 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Sharon Wilensky

CA 94122  
(415) 753-1161



**From:** [Jerry Smith](#)  
**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:** Thursday, July 16, 2020 1:55:48 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:

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Sincerely,  
Jerry Smith

OR 97405

**From:** [Gayle Smith](#)  
**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:** Thursday, July 16, 2020 8:13:20 AM

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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 ,

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Sincerely,  
Gayle Smith

CA 93923

**From:** [Tracy Cole](#)  
**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:** Thursday, July 16, 2020 3:04:40 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Tracy Cole

AZ 85302  
(623) 412-1466

**From:** [David Rice](#)  
**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:** Wednesday, July 15, 2020 6:11:48 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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
David Rice

NM 88011



**From:** [Bob Ramlow](#)  
**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:** Wednesday, July 15, 2020 5:20:42 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!

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Sincerely,  
Bob Ramlow

WI 54406  
(715) 824-3463

**From:** [Chris Ferrio](#)  
**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:** Wednesday, July 15, 2020 8:31:09 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Chris Ferrio

CT 06615  
(203) 378-2440

**From:** [Arthur Hansen](#)  
**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 14, 2020 8:50:17 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Arthur Hansen

NY 11367  
(203) 560-2806

**From:** [Denise Lytle](#)  
**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 14, 2020 8:41:38 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Denise Lytle

NJ 08863  
(732) 910-8543



**From:** [Ed Fiedler](#)  
**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 14, 2020 7:41:12 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Ed Fiedler

TX 78758  
(512) 997-8541

**From:** [Jesse Hunter](#)  
**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 14, 2020 3:39:24 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Jesse Hunter

CA 94947  
(206) 463-1924

**From:** [Audrey Clement](#)  
**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:** Monday, July 13, 2020 10:08:30 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Audrey Clement

VA 22205  
(571) 830-8889

**From:** [Evelyn Verrill](#)  
**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:** Monday, July 13, 2020 8:58:43 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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Evelyn Verrill

AZ 86305  
999999999



**From:** [Heather Davis](#)  
**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:** Monday, July 13, 2020 8:51:15 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:

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Sincerely,  
Heather Davis

OR 97003  
(503) 292-1926

**From:** [Nancy Caponi](#)  
**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:** Monday, July 13, 2020 3:47:53 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:

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Sincerely,  
Nancy Caponi

CA 93101

**From:** [Anne Tuddenham](#)  
**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:** Monday, July 13, 2020 3:27:10 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Anne Tuddenham

CA 94530  
(510) 409-2853

**From:** [cynthia molinero](#)  
**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:** Monday, July 13, 2020 2:55:39 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!

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
cynthia molinero

CO 80047  
(720) 323-2063



**From:** [Susan Kassouf](#)  
**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:** Monday, July 13, 2020 2:49:36 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Susan Kassouf

NY 10566  
(914) 739-3116

**From:** [Karen Suyemoto](#)  
**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:** Monday, July 13, 2020 1:51:16 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Karen Suyemoto

MA 02127

**From:** [Duncan Brown](#)  
**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:** Monday, July 13, 2020 4:59:48 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Duncan Brown

AZ 85710  
(520) 555-3968

**From:** [Amitav Dash](#)  
**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:** Monday, July 13, 2020 1:56:01 AM

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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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Amitav Dash

ON N1L 0A2  
(519) 836-4335



**From:** [Beverly Harris](#)  
**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:** Sunday, July 12, 2020 9:32:46 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Beverly Harris

CA 96080  
(530) 366-7361

**From:** [Larry Daniell](#)  
**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:** Sunday, July 12, 2020 6:54:51 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Larry Daniell

CA 95132

**From:** [Anne Craig](#)  
**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:** Sunday, July 12, 2020 5:29:17 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 ,

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Sincerely,  
Anne Craig

NC 28801  
(828) 423-2087

**From:** [Robin Kladke](#)  
**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:** Sunday, July 12, 2020 5:08:10 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 ,

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Sincerely,  
Robin Kladke

AZ 85705  
(520) 398-4627



**From:** [Melissa Heller-Booth](#)  
**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:** Sunday, July 12, 2020 4:46:28 PM

---

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 ,

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Sincerely,  
Melissa Heller-Booth

CA 92346

**From:** [Joan Breiding](#)  
**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:** Sunday, July 12, 2020 3:46:25 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Joan Breiding

CA 94117  
(415) 751-9508

**From:** [Devon Hildreth](#)  
**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:** Sunday, July 12, 2020 3:10:12 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Devon Hildreth

MA 01945

**From:** [Laurie Hope](#)  
**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:** Sunday, July 12, 2020 10:23:31 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Laurie Hope

CA 93023  
(804) 794-2524



**From:** [Jeannie Park](#)  
**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:** Sunday, July 12, 2020 2:40:12 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Jeannie Park

WA 98103

**From:** [Joel Porter](#)  
**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:** Sunday, July 12, 2020 1:59:09 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Joel Porter

OR 97213  
(503) 287-6956

**From:** [Marija Kljuce](#)  
**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:** Sunday, July 12, 2020 1:32:14 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Marija Kljuce

GA 30810

**From:** [Vladimir Levchenko](#)  
**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:** Saturday, July 11, 2020 8:22:48 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Vladimir Levchenko

ot RU



**From:** [Theresa Owens](#)  
**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:** Saturday, July 11, 2020 8:19:43 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:

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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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Theresa Owens

SC 29466  
(415) 647-2709

**From:** [sharon Frank](#)  
**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:** Saturday, July 11, 2020 8:07:13 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
sharon Frank

TX 75077  
(555) 555-5555

**From:** [Jaymee Workman](#)  
**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:** Saturday, July 11, 2020 7:42:09 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:

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Sincerely,  
Jaymee Workman

OR 97303  
(503) 409-7914

**From:** [Helen Sven](#)  
**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:** Saturday, July 11, 2020 5:17:14 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:

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Sincerely,  
Helen Syen

PA 19152  
(267) 324-9907



**From:** [Christine Garofalo](#)  
**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:** Saturday, July 11, 2020 4:38:05 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Christine Garofalo

GA 30144

**From:** [lyn\\_capurro](#)  
**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:** Saturday, July 11, 2020 4:24:35 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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
lyn capurro

NY 11021  
(123) 456-7890

**From:** [Heather Servais](#)  
**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:** Saturday, July 11, 2020 3:23:54 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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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Sincerely,  
Heather Servais

CO 80212  
(312) 661-2511

**From:** [Robin Perry](#)  
**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:** Saturday, July 11, 2020 2:48:36 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Robin Perry

CA 94602  
(510) 531-2796



**From:** [Cheryl Fergeson](#)  
**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:** Saturday, July 11, 2020 2:32:44 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 ,

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Sincerely,  
Cheryl Fergeson

UT 84401  
(801) 779-2550

**From:** [Nick Berezansky](#)  
**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:** Saturday, July 11, 2020 2:18:21 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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Nick Berezansky

NJ 07450  
(201) 670-6814

**From:** [Arthur Bogie](#)  
**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:** Saturday, July 11, 2020 2:12:40 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Arthur Bogie

WA 98221  
(360) 840-9092

**From:** [John Velter](#)  
**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:** Saturday, July 11, 2020 2:08:02 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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
John Velner

MI 49221  
(517) 263-3897



**From:** [Dwight Hughes](#)  
**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:** Saturday, July 11, 2020 2:07:49 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Dwight Hughes

OH 44054  
(440) 949-2986

**From:** [John Moszyk](#)  
**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:** Saturday, July 11, 2020 8:21:37 AM

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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:

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Sincerely,  
John Moszyk

MO 63129  
(314) 894-0044

**From:** [Carolyn Shafer](#)  
**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:** Saturday, July 11, 2020 5:44:06 AM

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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:

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Sincerely,  
Carolyn Shafer

NJ 08753  
(732) 270-3867

**From:** [Linda Keir](#)  
**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:** Saturday, July 11, 2020 1:28:26 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Linda Keir

OR 97055  
(707) 684-0712



**From:** [melba Dlugonski](#)  
**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:** Saturday, July 11, 2020 1:20:36 AM

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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 ,

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
melba Dlugonski

OR 97206  
(503) 777-0406

**From:** [John Zahos](#)  
**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:** Saturday, July 11, 2020 1:08:53 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
John Zahos

IL 60076  
(847) 715-0663

**From:** [Kimberly Wiley](#)  
**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:** Friday, July 10, 2020 10:29:42 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Kimberly Wiley

NY 14612  
(585) 227-4544

**From:** [Jocelyn DeCrescenzo](#)  
**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:** Friday, July 10, 2020 10:21:24 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Jocelyn DeCrescenzo

NY 10989  
(845) 271-9613



**From:** [Neal Ferris](#)  
**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:** Friday, July 10, 2020 7:25:55 PM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Neal Ferris

NH 03824  
(603) 868-1521

**From:** [Susan Perez](#)  
**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:** Friday, July 10, 2020 6:31:08 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Susan Perez

CA 94590  
(415) 900-6157

**From:** [Carl May](#)  
**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:** Friday, July 10, 2020 6:27:44 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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Carl May

CA 94038  
(650) 728-7792

**From:** [Satya Vayu](#)  
**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:** Friday, July 10, 2020 6:13:34 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Satya Vayu

OR 97206  
503 - 327 - 8362



**From:** [Fredric Hefter](#)  
**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:** Friday, July 10, 2020 5:55:36 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:

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Sincerely,  
Fredric Hefter

IN 47304  
(765) 729-2547

**From:** [Ken Bossong](#)  
**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:** Friday, July 10, 2020 5:16:05 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 ,

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Sincerely,  
Ken Bossong

MD 20912  
(301) 270-6477

**From:** [Marian Cooley](#)  
**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:** Friday, July 10, 2020 4:38:00 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Marian Cooley

IN 47304  
(765) 284-0969

**From:** [Virginia Bottorff](#)  
**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:** Friday, July 10, 2020 4:32:31 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!

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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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Virginia Bottorff

NY 13202  
(315) 555-5555



**From:** [Scott Grinthal](#)  
**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:** Friday, July 10, 2020 4:17:56 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!

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Sincerely,  
Scott Grinthal

CA 94402  
(650) 573-5105

**From:** [Karen Peterson](#)  
**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:** Friday, July 10, 2020 4:01:23 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Karen Peterson

IL 60062  
(555) 555-5555

**From:** [Brian Habenicht](#)  
**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:** Friday, July 10, 2020 2:31:11 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!

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Sincerely,  
Brian Habenicht

NC 28806  
(828) 301-9380

**From:** [N. J. Bast](#)  
**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:** Friday, July 10, 2020 2:29:20 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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
N. J. Bast

CA 93442  
(805) 234-1830



**From:** [Anthony Szilagye](#)  
**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:** Friday, July 10, 2020 2:05:13 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Anthony Szilagye

OH 43460  
(419) 661-9387

**From:** [Dana Abbott](#)  
**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:** Friday, July 10, 2020 11:56:42 AM

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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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Dana Abbott

CA 95001  
(408) 691-3737

**From:** [Clara Guerrero](#)  
**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:** Friday, July 10, 2020 11:20:40 AM

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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 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.

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Sincerely,  
Clara Guerrero

IL 60641  
(773) 430-6914

**From:** [Beth Goode](#)  
**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:** Friday, July 10, 2020 9:24:30 AM

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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!

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Sincerely,  
Beth Goode

CA 90290  
(310) 909-9683



**From:** [Orrin Merritt](#)  
**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:** Friday, July 10, 2020 9:17:23 AM

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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 ,

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Sincerely,  
Orrin Merritt

IL 60135  
(815) 784-5855

**From:** [Priscilla Newcomer](#)  
**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:** Friday, July 10, 2020 8:56:10 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Priscilla Newcomer

WV 25405  
(304) 262-6986

**From:** [Tim Stein](#)  
**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:** Friday, July 10, 2020 8:14:43 AM

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Nuclear Regulatory Commission (EPZs)

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Tim Stein

MN 55806  
(843) 997-3845

**From:** [kellie f](#)  
**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:** Friday, July 10, 2020 7:16:57 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
kellie f

OR 97306



**From:** [Katherine Tomasello](#)  
**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:** Friday, July 10, 2020 6:34:47 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Katherine Tomasello

NY 14086  
(716) 717-4903

**From:** [Sara Cox](#)  
**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:** Friday, July 10, 2020 5:26:54 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Sara Cox

NH 03043  
(603) 547-3707

**From:** [Terumi TERA AO](#)  
**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:** Friday, July 10, 2020 4:45:33 AM

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Nuclear Regulatory Commission (EPZs)

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Terumi TERAAO

ot 00000

**From:** [Thomas Talbot](#)  
**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:** Friday, July 10, 2020 1:10:56 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Thomas Talbot

NM 88021  
(915) 740-5527



**From:** [Bonnie McGill](#)  
**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:** Friday, July 10, 2020 1:08:05 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Bonnie McGill

PA 16316  
(814) 382-9026

**From:** [Micaela Pronio](#)  
**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:** Friday, July 10, 2020 1:03:04 AM

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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:

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Sincerely,  
Micaela Pronio

CA 94609  
(510) 428-1635

**From:** [Kathy Kosinski](#)  
**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:** Friday, July 10, 2020 12:32:08 AM

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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 ,

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Sincerely,  
Kathy Kosinski

CA 93117  
(555) 555-5555

**From:** [Florence Hartv](#)  
**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:** Thursday, July 09, 2020 11:52:10 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 ,

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Sincerely,  
Florence Harty

WA 98672  
(561) 302-1950



**From:** [Christine walturz](#)  
**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:** Thursday, July 09, 2020 11:00:12 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Christine walturz

PA 18042  
(908) 619-5216

**From:** [Karen Milstein](#)  
**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:** Thursday, July 09, 2020 10:48:06 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:

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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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Karen Milstein

NM 87506  
(505) 670-2906

**From:** [Amy Cusick](#)  
**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:** Thursday, July 09, 2020 10:40:00 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 ,

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Sincerely,  
Amy Cusick

MN 55405  
(612) 636-1704

**From:** [Carol Przybylak](#)  
**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:** Thursday, July 09, 2020 10:31:46 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!

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Sincerely,  
Carol Przybylak

NY 14212  
(716) 440-2572



**From:** [MaryAnna Foskett](#)  
**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:** Thursday, July 09, 2020 9:47:22 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!

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Sincerely,  
MaryAnna Foscett

MA 02476  
(781) 646-5882

**From:** [Robert L. Oman](#)  
**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:** Thursday, July 09, 2020 9:25:29 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!

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Robert L. Oman

CA 91342  
(818) 362-7285

**From:** [Vincent Rubino](#)  
**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:** Thursday, July 09, 2020 9:22:24 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Vincent Rubino

CA 94706  
(510) 367-6743

**From:** [Andy Lupenko](#)  
**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:** Thursday, July 09, 2020 9:19:18 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Andy Lupenko

CA 91945  
(619) 464-0774



**From:** [Rick Geyer](#)  
**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:** Thursday, July 09, 2020 8:45:01 PM

---

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 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.

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Sincerely,  
Rick Geyer

OH 43082  
(614) 882-4601

**From:** [Carolyn Wacaser](#)  
**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:** Thursday, July 09, 2020 8:45:01 PM

---

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 ,

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Sincerely,  
Carolyn Wacaser

CO 80227  
(303) 988-8440

**From:** [Marleny M.](#)  
**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:** Thursday, July 09, 2020 8:31:31 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:

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Sincerely,  
Marleny M.

FL 33313  
(305) 691-4430

**From:** [Kathryn Lilley](#)  
**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:** Thursday, July 09, 2020 7:57:37 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Kathryn Lilley

OH 43081  
+15555555555



**From:** [Lee Dublin](#)  
**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:** Thursday, July 09, 2020 7:44:24 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:

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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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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.

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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,  
Lee Dublin

CA 90405

**From:** [Sandra Booth](#)  
**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:** Thursday, July 09, 2020 7:36:11 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 ,

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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.

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The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Sandra Booth

CA 94581

**From:** [Art Hanson](#)  
**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:** Thursday, July 09, 2020 7:35:03 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 am writing in strong 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 urge the NRC to extend the comment period to 6 months after the end of the COVID-19 crisis.

The 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, the NRC is opening the door for reactors of any size, design, and vintage to reduce or eliminate emergency planning.

The 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,  
Art Hanson

MI 48917  
(517) 420-4314

**From:** [Debra Stoleroff](#)  
**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:** Thursday, July 09, 2020 7:34:20 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!

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Sincerely,  
Debra Stoleroff

VT 05667  
(802) 476-3154



**From:** [Dita Škalič](#)  
**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:** Thursday, July 09, 2020 7:34:17 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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Dita Škalič

ot 9226  
38631721744

**From:** [Robert Glover](#)  
**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:** Thursday, July 09, 2020 7:12:23 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Robert Glover

CA 93726  
(559) 349-0180

**From:** [Judy Foster](#)  
**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:** Thursday, July 09, 2020 7:10:16 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Judy Foster

ID 83333

**From:** [Peter Melka](#)  
**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:** Thursday, July 09, 2020 6:56:46 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:

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Sincerely,  
Peter Melka

MN 56209  
(320) 974-8931



**From:** [Dorothy Kraemer](#)  
**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:** Thursday, July 09, 2020 6:43:57 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:

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Sincerely,  
Dorothy Kraemer

TX 78660  
(512) 251-6929

**From:** [Bonnie Yohe](#)  
**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:** Thursday, July 09, 2020 6:43:54 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!

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Sincerely,  
Bonnie Yohe

NE 68506  
(402) 488-5446

**From:** [Lynne Draper](#)  
**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:** Thursday, July 09, 2020 6:36:57 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Lynne Draper

NH 03057  
(603) 554-8809

**From:** [Maria Millar](#)  
**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:** Thursday, July 09, 2020 6:24:12 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Maria Millar

NY 10023  
(555) 555-5555



**From:** [Sammy Low](#)  
**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:** Thursday, July 09, 2020 6:06:30 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!

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Sincerely,  
Sammy Low

WA 98292  
(360) 654-0886

**From:** [Jenni Kovich](#)  
**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:** Thursday, July 09, 2020 6:03:57 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!

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Sincerely,  
Jenni Kovich

WV 25123  
(304) 543-2801

**From:** [Adina Parsley](#)  
**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:** Thursday, July 09, 2020 5:47:55 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 ,

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Sincerely,  
Adina Parsley

WA 98292  
(360) 654-0886

**From:** [doug.fraanklin](#)  
**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:** Thursday, July 09, 2020 5:42:51 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 ,

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
doug fraanklin

NC 28904  
(828) 389-1027



**From:** [steve hopkins](#)  
**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:** Thursday, July 09, 2020 5:32:39 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
steve hopkins

NY 10580  
(914) 632-2012

**From:** [Bernadine Young](#)  
**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:** Thursday, July 09, 2020 5:19:55 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Bernadine Young

NC 28805  
(978) 325-3244

**From:** [Sam Holden](#)  
**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:** Thursday, July 09, 2020 5:03:25 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Sam Holden

OR 97405  
(541) 729-9013

**From:** [Dorothy Dobbyn](#)  
**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:** Thursday, July 09, 2020 4:51:30 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 ,

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Sincerely,  
Dorothy Dobbyn

DE 19966  
(302) 947-1384



**From:** [Heath Post](#)  
**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:** Thursday, July 09, 2020 4:40:45 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:

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Sincerely,  
Heath Post

MI 48906  
(517) 555-0134

**From:** [Sandra Mardigian](#)  
**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:** Thursday, July 09, 2020 4:22:54 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Sandra Mardigian

CA 94941  
(415) 272-8191

**From:** [peter.meissner](#)  
**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:** Thursday, July 09, 2020 4:20:43 PM

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Nuclear Regulatory Commission (EPZs)

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
peter meissner

CA 93111  
(000) 000-0000

**From:** [David Trione](#)  
**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:** Thursday, July 09, 2020 4:11:04 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
David Trione

OR 97370  
(541) 231-1799



**From:** [Carmela Sudano](#)  
**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:** Thursday, July 09, 2020 4:09:30 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Carmela Sudano

UT 84047  
(801) 580-1484

**From:** [Eric Parker](#)  
**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:** Thursday, July 09, 2020 4:09:17 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Eric Parker

MA 02127

**From:** [kathleen hannan](#)  
**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:** Thursday, July 09, 2020 4:01:38 PM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
kathleen hannan

PA 19111  
(215) 579-3077

**From:** [kathleen hannan](#)  
**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:** Thursday, July 09, 2020 4:01:31 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
kathleen hannan

PA 19111  
(215) 579-3077



**From:** [Diana Saxon](#)  
**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:** Thursday, July 09, 2020 3:57:19 PM

---

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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Diana Saxon

OR 97301  
(503) 884-3203

**From:** [Deborah Cate](#)  
**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:** Thursday, July 09, 2020 3:48:17 PM

---

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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Deborah Cate

PA 19131  
(610) 592-7046

**From:** [Nancy Enkiri](#)  
**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:** Thursday, July 09, 2020 3:32:06 PM

---

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 ,

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Sincerely,  
Nancy Enkiri

MD 20705  
(301) 595-4544

**From:** [Linda Townley](#)  
**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:** Thursday, July 09, 2020 3:18:44 PM

---

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 ,

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Sincerely,  
Linda Townley

CA 92869  
(714) 288-9313



**From:** [sue.colucci](#)  
**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:** Thursday, July 09, 2020 3:01:18 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
sue colucci

MI 48346  
440 774 6079

**From:** [Craig Cline](#)  
**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:** Thursday, July 09, 2020 2:57:17 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Craig Cline

OR 97302  
(503) 364-2448

**From:** [John Culloty](#)  
**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:** Thursday, July 09, 2020 2:54:05 PM

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Sincerely,  
John Culloty

CA 95005  
(831) 588-8377

**From:** [Rita Gugliotta](#)  
**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:** Thursday, July 09, 2020 2:53:00 PM

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Sincerely,  
Rita Gugliotta

NM 87508  
(505) 438-1194



**From:** [judith hazelton](#)  
**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:** Thursday, July 09, 2020 2:43:57 PM

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Sincerely,  
judith hazelton

VT 05201  
(802) 447-7426

**From:** [Ran Zirasri](#)  
**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:** Thursday, July 09, 2020 2:43:04 PM

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Ran Zirasri

ND 58103  
(701) 426-2323

**From:** [Leigh Steele](#)  
**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:** Thursday, July 09, 2020 2:32:55 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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Leigh Steele

IN 47840  
(812) 986-2686

**From:** [Mary Counihan](#)  
**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:** Thursday, July 09, 2020 2:06:30 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Mary Counihan

CA 94114



**From:** [Glenn Brownton](#)  
**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:** Thursday, July 09, 2020 2:06:27 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!

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Sincerely,  
Glenn Brownton

CA 94114  
(000) 000-0000

**From:** [Laura Hanks](#)  
**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:** Thursday, July 09, 2020 1:53:56 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 ,

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Sincerely,  
Laura Hanks

OR 97222  
(503) 257-2312

**From:** [Dave Parrish](#)  
**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:** Thursday, July 09, 2020 1:34:00 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Dave Parrish

AZ 85375  
(623) 810-1803

**From:** [Erica Stanojevic](#)  
**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:** Thursday, July 09, 2020 1:33:44 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Erica Stanojevic

CA 95060  
(408) 202-6430



**From:** [Carolyn Treadway](#)  
**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:** Thursday, July 09, 2020 1:19:28 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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Carolyn Treadway

WA 98503  
(360) 438-5424

**From:** [A. G. Sharpe-Torres](#)  
**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:** Thursday, July 09, 2020 1:12:39 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
A. G. Sharpe-Torres

NM 88022  
(575) 313-5862

**From:** [Cindy Meyers](#)  
**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:** Thursday, July 09, 2020 12:52:11 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Cindy Meyers

CA 95076  
(831) 688-4770

**From:** [Fred Lavy](#)  
**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:** Thursday, July 09, 2020 12:45:15 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!

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Sincerely,  
Fred Lavy

VA 22802  
(540) 433-1461



**From:** [Susannah Masarie](#)  
**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:** Thursday, July 09, 2020 12:42:19 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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Susannah Masarie

GA 30328  
(336) 317-6324

**From:** [Marcia Halligan](#)  
**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:** Thursday, July 09, 2020 12:38:38 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Marcia Halligan

WI 54665  
(608) 637-2079

**From:** [Thomas De Pree](#)  
**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:** Thursday, July 09, 2020 12:30:30 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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Thomas De Pree

NY 10031  
(505) 263-1853

**From:** [John Catherine](#)  
**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:** Thursday, July 09, 2020 12:25:22 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
John Catherine

NY 10016  
(212) 555-1212



**From:** [Jamie Guy Ostrowski](#)  
**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:** Thursday, July 09, 2020 12:23:56 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:

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Sincerely,  
Jamie Guy Ostrowski

MI 48135  
(985) 210-9767

**From:** [Joel Leitner](#)  
**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:** Thursday, July 09, 2020 12:23:47 PM

---

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 ,

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Sincerely,  
Joel Leitner

NY 10538  
(914) 426-8969

**From:** [Joanne Hesselink](#)  
**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:** Thursday, July 09, 2020 12:19:43 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Joanne Hesselink

WI 54960  
(920) 293-4455

**From:** [Tom Hougham](#)  
**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:** Thursday, July 09, 2020 12:17:43 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!

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Tom Hougham

IN 46181  
(317) 878-4210



**From:** [kerry.mortensen](#)  
**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:** Thursday, July 09, 2020 12:16:13 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
kerry mortensen

IL 60087  
(847) 902-2753

**From:** [judy nakadegawa](#)  
**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:** Thursday, July 09, 2020 11:56:20 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
judy nakadegawa

CA 94707  
(510) 526-5094

**From:** [Monica O'Brien](#)  
**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:** Thursday, July 09, 2020 11:50:23 AM

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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!

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Sincerely,  
Monica O'Brien

WI 53711  
(608) 271-2808

**From:** [Kirk Miller](#)  
**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:** Thursday, July 09, 2020 11:42:05 AM

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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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Kirk Miller

TX 75080



**From:** [Robert Lieber](#)  
**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:** Thursday, July 09, 2020 11:40:52 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Robert Lieber

CA 94706  
(510) 703-1876

**From:** [Paul Lapidus](#)  
**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:** Thursday, July 09, 2020 11:40:01 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Paul Lapidus

CA 95004  
(831) 726-1443

**From:** [Barbara Brigham](#)  
**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:** Thursday, July 09, 2020 11:19:09 AM

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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:

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Sincerely,  
Barbara Brigham

PA 19125  
(215) 291-0246

**From:** [Tim King](#)  
**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:** Thursday, July 09, 2020 11:18:52 AM

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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 ,

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Sincerely,  
Tim King

MN 56347  
(320) 732-6203



**From:** [Jack Ray](#)  
**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:** Thursday, July 09, 2020 11:12:48 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Jack Ray

DE 19702  
(302) 368-4674

**From:** [Elizabeth ODear](#)  
**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:** Thursday, July 09, 2020 11:07:51 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Elizabeth ODear

TX 77401  
(713) 665-7838

**From:** [Terrie Williams](#)  
**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:** Thursday, July 09, 2020 11:05:03 AM

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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 ,

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Sincerely,  
Terrie Williams

TX 77662  
(409) 999-9999

**From:** [charles pohlod](#)  
**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:** Thursday, July 09, 2020 10:57:35 AM

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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!

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Sincerely,  
charles pohlod

MO 65201



**From:** [Paul Turner](#)  
**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:** Thursday, July 09, 2020 10:51:26 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Paul Turner

NC 28748  
(828) 280-7343

**From:** [Joan Yater](#)  
**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:** Thursday, July 09, 2020 10:51:03 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Joan Yater

VA 22308  
(703) 780-2430

**From:** [Jill B.](#)  
**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:** Thursday, July 09, 2020 10:50:23 AM

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Nuclear Regulatory Commission (EPZs)

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Dear ,

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Jill B.

CA 94109  
(888) 880-8800

**From:** [Janelle Murphy](#)  
**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:** Thursday, July 09, 2020 10:44:44 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Janelle Murphy

TX 77554



**From:** [Regina Logue](#)  
**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:** Thursday, July 09, 2020 10:44:19 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Regina Logue

CA 92586  
(555) 555-5555

**From:** [Holly Huntley](#)  
**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:** Thursday, July 09, 2020 10:27:53 AM

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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 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.

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Sincerely,  
Holly Huntley

CA 93063  
(805) 587-4578

**From:** [Dixie van der Kamp](#)  
**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:** Thursday, July 09, 2020 10:25:58 AM

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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 ,

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Sincerely,  
Dixie van der Kamp

CA 95404  
(707) 528-0894

**From:** [Lisa Ehle](#)  
**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:** Thursday, July 09, 2020 9:59:03 AM

---

Nuclear Regulatory Commission (EPZs)

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Dear ,

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Sincerely,  
Lisa Ehle

WA 98250  
(360) 788-3944



**From:** [susan tucker](#)  
**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:** Thursday, July 09, 2020 9:53:27 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
susan tucker

PA 16365  
(814) 688-1857

**From:** [Ann Behrmann](#)  
**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:** Thursday, July 09, 2020 9:46:42 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Ann Behrmann

WI 53726  
(608) 669-6809

**From:** [Julienne DeMarsh](#)  
**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:** Thursday, July 09, 2020 9:39:41 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Julienne DeMarsh

OR 97457  
(541) 680-6057

**From:** [Nancy LaPlaca](#)  
**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:** Thursday, July 09, 2020 9:33:39 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Nancy LaPlaca

NC 27705  
(480) 359-8442



**From:** [raymond & christine gicela](#)  
**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:** Thursday, July 09, 2020 9:21:12 AM

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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!

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Sincerely,  
raymond & christine gicela

IL 60185  
(630) 231-8382

**From:** [Ruth Panella](#)  
**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:** Thursday, July 09, 2020 9:17:28 AM

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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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Ruth Panella

DE 19810  
(234) 561-2301

**From:** [Mary S. Gregg](#)  
**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:** Thursday, July 09, 2020 9:16:29 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Mary S. Gregg

TN 37405

**From:** [Julie Berberi](#)  
**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:** Thursday, July 09, 2020 9:15:37 AM

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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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Julie Berberi

IL 60175  
(248) 391-6781



**From:** [Julie Berberi](#)  
**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:** Thursday, July 09, 2020 9:15:34 AM

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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:

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Sincerely,  
Julie Berberi

IL 60175  
(248) 391-6781

**From:** [Vernon Batty](#)  
**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:** Thursday, July 09, 2020 9:11:27 AM

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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 ,

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Sincerely,  
Vernon Batty

CO 81147  
(719) 433-2767

**From:** [Lee Greenawalt](#)  
**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:** Thursday, July 09, 2020 9:10:17 AM

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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!

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Sincerely,  
Lee Greenawalt

CA 95340  
(209) 355-0591

**From:** [Pam Speagle](#)  
**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:** Thursday, July 09, 2020 9:03:46 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Pam Speagle

KY 40214  
(502) 299-8012



**From:** [Carl Pribanic](#)  
**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:** Thursday, July 09, 2020 8:55:56 AM

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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:

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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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Carl Pribanic

TX 75025  
(972) 527-6013

**From:** [Dennis Nelson](#)  
**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:** Thursday, July 09, 2020 8:53:43 AM

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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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Dennis Nelson

CA 92126  
(858) 610-6736

**From:** [Merle Showers](#)  
**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:** Thursday, July 09, 2020 8:47:03 AM

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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!

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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,  
Merle Showers

NY 14215  
(716) 862-4235

**From:** [Bernie Zelazny](#)  
**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:** Thursday, July 09, 2020 8:42:45 AM

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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 ,

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Sincerely,  
Bernie Zelazny

TX 79830  
(432) 837-1717



**From:** [Gordon Murphy](#)  
**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:** Thursday, July 09, 2020 8:22:16 AM

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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 ,

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Gordon Murphy

FL 33771  
(727) 687-2816

**From:** [Bruce Cratty](#)  
**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:** Thursday, July 09, 2020 8:19:59 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Bruce Cratty

OH 44313  
(303) 722-2524

**From:** [jack bubenick](#)  
**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:** Thursday, July 09, 2020 8:04:05 AM

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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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
jack bubenick

SC 29569  
(908) 227-6415

**From:** [Carol Kussart](#)  
**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:** Thursday, July 09, 2020 7:56:51 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Carol Kussart

IL 61818  
(217) 855-3258



**From:** [Kristi Collins](#)  
**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:** Thursday, July 09, 2020 7:45:32 AM

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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:

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Sincerely,  
Kristi Collins

TX 76012

**From:** [Charles Leiden](#)  
**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:** Thursday, July 09, 2020 7:36:08 AM

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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:

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Sincerely,  
Charles Leiden

PA 16602  
(814) 946-9291

**From:** [Richard Heinlein](#)  
**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:** Thursday, July 09, 2020 7:34:49 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Richard Heinlein

WI 53179  
(262) 492-1753

**From:** [Dmitry Landa](#)  
**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:** Thursday, July 09, 2020 7:21:08 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Dmitry Landa

NY 11421



**From:** [Dolores Parra](#)  
**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:** Thursday, July 09, 2020 7:15:00 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Dolores Parra

FL 34639  
(813) 996-1962

**From:** [Peter Lee](#)  
**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:** Thursday, July 09, 2020 6:58:52 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Peter Lee

CA 94118  
(415) 752-7702

**From:** [Pat Magrath](#)  
**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:** Thursday, July 09, 2020 6:25:39 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Pat Magrath

CA 91767  
(909) 709-6864

**From:** [tracy mcdonald](#)  
**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:** Thursday, July 09, 2020 6:11:46 AM

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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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
tracy mcdonald

NJ 07760  
(732) 822-3188



**From:** [Axel Vogt](#)  
**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:** Thursday, July 09, 2020 5:10:20 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its 7th review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure - every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of harm's way when

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Sincerely,  
Axel Vogt

ot 79117  
(012) 345-6789

**From:** [Joe Tricase](#)  
**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:** Thursday, July 09, 2020 4:58:15 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Joe Tricase

ot 21933  
T0423215581

**From:** [Albert Snow](#)  
**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:** Thursday, July 09, 2020 4:54:46 AM

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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 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.

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Sincerely,  
Albert Snow

WA 98225  
(360) 676-5669

**From:** [Joseph Dadgari](#)  
**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:** Thursday, July 09, 2020 4:51:04 AM

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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:

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Sincerely,  
Joseph Dadgari

CA 90049  
(310) 709-1208



**From:** [Ellen Atkinson](#)  
**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:** Thursday, July 09, 2020 4:33:51 AM

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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:

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Sincerely,  
Ellen Atkinson

VA 24502  
(434) 208-0117

**From:** [Joan Lobell](#)  
**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:** Thursday, July 09, 2020 4:22:26 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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.

The current COVID-19 pandemic has shown how negligence of responsible protections and lack of preparation has made a terrible situation much much worse. Everything the corrupt Trump administration does is negligent, corrupt, and ultimately dangerous. Still, nuclear waste and emissions are more permanent. Do you think you aren't in danger?

Sincerely,  
Joan Lobell

MD 21212  
(410) 433-9017

**From:** [Mary Sullivan](#)  
**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:** Thursday, July 09, 2020 4:21:51 AM

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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:

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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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Mary Sullivan

CA 92646  
(714) 987-6543

**From:** [nick marling](#)  
**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:** Thursday, July 09, 2020 3:36:20 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
nick marling

CA 95624



**From:** [Geri Collecchia](#)  
**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:** Thursday, July 09, 2020 3:30:59 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Geri Collecchia

IL 60601  
(954) 391-8855

**From:** [Mary Hahn](#)  
**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:** Thursday, July 09, 2020 3:30:13 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Mary Hahn

WI 53588  
(608) 664-5671

**From:** [Michael Tomczyszyn](#)  
**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:** Thursday, July 09, 2020 2:54:44 AM

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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!

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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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Michael Tomczyszyn

CA 94132  
(415) 452-8295

**From:** [Donna Browne](#)  
**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:** Thursday, July 09, 2020 2:38:43 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Donna Browne

NJ 08080  
(609) 617-8899



**From:** [Alice Anne Martineau](#)  
**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:** Thursday, July 09, 2020 2:33:37 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Alice Anne Martineau

CA 94041  
(650) 967-9381

**From:** [Megan Warren](#)  
**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:** Thursday, July 09, 2020 2:30:50 AM

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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 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.

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Sincerely,  
Megan Warren

IL 61701  
(309) 826-1111

**From:** [g.g](#)  
**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:** Thursday, July 09, 2020 2:27:17 AM

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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:

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Sincerely,

q q

CA 92222  
(858) 858-8585

**From:** [Carol Scher](#)  
**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:** Thursday, July 09, 2020 2:25:20 AM

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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 ,

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Carol Scher

CA 95503  
(707) 442-8566



**From:** [Santiago Muñoz Sebastián](#)  
**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:** Thursday, July 09, 2020 2:21:14 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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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,  
Santiago Muñoz Sebastián

ot 28220  
625930130

**From:** [Camille Gilbert](#)  
**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:** Thursday, July 09, 2020 2:21:11 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Camille Gilbert

CA 93101  
(805) 687-2478

**From:** [Ken Fogel](#)  
**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:** Thursday, July 09, 2020 2:18:08 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Ken Fogel

GA 30087  
(678) 389-4907

**From:** [Sue Halligan](#)  
**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:** Thursday, July 09, 2020 2:16:45 AM

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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 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.

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Sincerely,  
Sue Halligan

MN 55125  
(651) 739-8207



**From:** [Kirk Bails](#)  
**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:** Thursday, July 09, 2020 1:58:27 AM

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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:

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Sincerely,  
Kirk Bails

MI 48045  
(586) 792-2187

**From:** [Kathryn Lambros](#)  
**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:** Thursday, July 09, 2020 1:50:11 AM

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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:

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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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Kathryn Lambros

WA 98117

**From:** [Randy Gerlach](#)  
**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:** Thursday, July 09, 2020 1:49:52 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Randy Gerlach

CA 94014  
(415) 584-4185

**From:** [Jane Yater](#)  
**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:** Thursday, July 09, 2020 1:37:12 AM

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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:

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Jane Yater

TX 78704  
(512) 416-9617



**From:** [christine popowski](#)  
**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:** Thursday, July 09, 2020 1:36:06 AM

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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:

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Sincerely,  
christine popowski

MN 55408  
(612) 987-9046

**From:** [Dennis Hester](#)  
**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:** Thursday, July 09, 2020 1:31:55 AM

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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 ,

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Sincerely,  
Dennis Hester

MI 48444  
(586) 651-1212

**From:** [Dixie Belcher](#)  
**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:** Thursday, July 09, 2020 1:29:31 AM

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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 ,

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Dixie Belcher

AK 99801  
(907) 789-0449

**From:** [Marianne Flanagan](#)  
**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:** Thursday, July 09, 2020 1:27:29 AM

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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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Marianne Flanagan

IL 60018  
(847) 296-9234



**From:** [Sandra Woodall](#)  
**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:** Thursday, July 09, 2020 1:18:27 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Sandra Woodall

TX 78212  
(210) 824-5422

**From:** [Laurie Alexander](#)  
**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:** Thursday, July 09, 2020 1:13:51 AM

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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:

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Sincerely,  
Laurie Alexander

CA 95828  
(916) 470-2741

**From:** [Brett Tharp](#)  
**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:** Thursday, July 09, 2020 1:09:12 AM

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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!

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Sincerely,  
Brett Tharp

AZ 85615  
(520) 422-2497

**From:** [PAT DAWSON](#)  
**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:** Thursday, July 09, 2020 1:00:50 AM

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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 ,

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Sincerely,  
PAT DAWSON

MO 63362  
(636) 366-4116



**From:** [Dr. William "Skip" Dykoski](#)  
**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:** Thursday, July 09, 2020 12:58:20 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Dr. William 'Skip' Dykoski

MN 55112  
(651) 636-2980

**From:** [Dr. William "Skip" Dykoski](#)  
**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:** Thursday, July 09, 2020 12:57:59 AM

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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!

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Dr. William 'Skip' Dykoski

MN 55112  
(651) 636-2980

**From:** [Tania Malven](#)  
**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:** Thursday, July 09, 2020 12:54:06 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Tania Malven

AZ 85719  
(520) 795-0281

**From:** [John Dunn](#)  
**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:** Thursday, July 09, 2020 12:53:46 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
John Dunn

WA 98070  
(206) 903-9639



**From:** [Wendy Larson](#)  
**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:** Thursday, July 09, 2020 12:50:18 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Wendy Larson

CA 95380  
(209) 667-5732

**From:** [Michael Kast](#)  
**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:** Thursday, July 09, 2020 12:45:35 AM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Michael Kast

CA 91402  
(818) 989-2544

**From:** [Gloria Krueger](#)  
**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:** Thursday, July 09, 2020 12:43:16 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Gloria Krueger

WI 53714  
(608) 906-1090

**From:** [Karen D. Felts](#)  
**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:** Thursday, July 09, 2020 12:42:52 AM

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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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Karen D. Felts

IN 46060  
(812) 340-0021



**From:** [Croitiene ganMorvyn](#)  
**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:** Thursday, July 09, 2020 12:36:44 AM

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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:

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Croitiene ganMoryn

FL 34480  
(352) 368-9608

**From:** [Jennifer Cunningham](#)  
**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:** Thursday, July 09, 2020 12:32:13 AM

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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 ,

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Sincerely,  
Jennifer Cunningham

IL 60506  
(414) 614-3523

**From:** [Matt Cornell](#)  
**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:** Thursday, July 09, 2020 12:29:27 AM

---

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 ,

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Sincerely,  
Matt Cornell

CO 81303  
(214) 794-0773

**From:** [Larry Lambeth](#)  
**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:** Thursday, July 09, 2020 12:29:27 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Larry Lambeth

MO 65810  
(417) 883-1105



**From:** [Bruce Rauscher](#)  
**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:** Thursday, July 09, 2020 12:26:51 AM

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Nuclear Regulatory Commission (EPZs)

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Bruce Rauscher

VA 22312  
(703) 941-4879

**From:** [Michelle Pavcovich](#)  
**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:** Thursday, July 09, 2020 12:23:17 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Michelle Pavcovich

WA 98125  
(206) 706-3435

**From:** [Pat and Gary Gover](#)  
**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:** Thursday, July 09, 2020 12:20:36 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Pat and Gary Gover

AL 36532  
(251) 990-8662

**From:** [Chris Kermiet](#)  
**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:** Thursday, July 09, 2020 12:18:59 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Chris Kermiet

CO 80207  
(303) 321-2262



**From:** [Kate Goetz](#)  
**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:** Thursday, July 09, 2020 12:18:17 AM

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Nuclear Regulatory Commission (EPZs)

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Kate Goetz

IL 60645  
(773) 744-9090

**From:** [Claudia Bosshammer-Bilimek](#)  
**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:** Thursday, July 09, 2020 12:17:06 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Claudia Bosshammer-Bilimek

KS 66002

**From:** [Jon Bazinet](#)  
**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:** Thursday, July 09, 2020 12:15:55 AM

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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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Jon Bazinet

CA 94591  
(510) 000-0000

**From:** [William Justis](#)  
**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:** Thursday, July 09, 2020 12:15:07 AM

---

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:

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Sincerely,  
William Justis

WA 98512  
(360) 866-8427



**From:** [Esther Garvett](#)  
**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:** Thursday, July 09, 2020 12:14:06 AM

---

Nuclear Regulatory Commission (EPZs)

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

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Sincerely,  
Esther Garvett

FL 33125  
(305) 282-4437

**From:** [tlaloc tokuda](#)  
**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:** Thursday, July 09, 2020 12:05:22 AM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
tlaloc tokuda

HI 90740  
(808) 325-0486.

**From:** [Martha Goldin](#)  
**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:** Thursday, July 09, 2020 12:03:38 AM

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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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Martha Goldin

CA 94118  
(415) 333-1212

**From:** [Nelson Stockdill](#)  
**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:** Thursday, July 09, 2020 12:03:37 AM

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Nuclear Regulatory Commission (EPZs)

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Nelson Stockdill

MI 48198  
(123) 456-7890



**From:** [Carol Gordon](#)  
**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:** Wednesday, July 08, 2020 11:59:51 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Carol Gordon

CA 90027  
(323) 662-2492

**From:** [Lula Shoberg](#)  
**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:** Wednesday, July 08, 2020 11:59:08 PM

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Sincerely,  
Lula Shoberg

CA 95116  
(408) 923-9257

**From:** [Cynthia McCarthy](#)  
**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:** Wednesday, July 08, 2020 11:58:15 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Cynthia McCarthy

CA 93515  
(760) 873-4939

**From:** [Margaret Phelps](#)  
**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:** Wednesday, July 08, 2020 11:53:15 PM

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Margaret Phelps

CA 90024  
(310) 234-1294



**From:** [D. Rincon](#)  
**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:** Wednesday, July 08, 2020 11:51:00 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
D. Rincon

CA 93703  
(559) 243-9375

**From:** [Roxann Carmean Floyd](#)  
**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:** Wednesday, July 08, 2020 11:49:02 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Roxann Carmean Floyd

AZ 85541  
(928) 476-6492

**From:** [Sheila Parks](#)  
**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:** Wednesday, July 08, 2020 11:47:35 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Sheila Parks

MA 02472  
(617) 744-6020

**From:** [Wolfgang Loera](#)  
**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:** Wednesday, July 08, 2020 11:44:02 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:

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Sincerely,  
Wolfgang Loera

WA 98005  
NO!



**From:** [Sam King](#)  
**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:** Wednesday, July 08, 2020 11:42:30 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:

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Sincerely,  
Sam King

CA 95519  
(000) 000-0000

**From:** [Jesse Calderon](#)  
**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:** Wednesday, July 08, 2020 11:40:12 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Jesse Calderon

CA 91706  
(555) 555-5555

**From:** [christopher kustra](#)  
**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:** Wednesday, July 08, 2020 11:36:40 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:

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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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
christopher kustra

WI 53531  
608/764-5684

**From:** [Donna Ksczanowicz](#)  
**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:** Wednesday, July 08, 2020 11:31:41 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Donna Ksczanowicz

NY 14626  
(585) 225-8275



**From:** [Hillary Ostrow](#)  
**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:** Wednesday, July 08, 2020 11:25:00 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Hillary Ostrow

CA 91316  
(818) 345-9868

**From:** [Nancy Brown](#)  
**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:** Wednesday, July 08, 2020 11:17:15 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!

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Thank you for your time and attention

Sincerely,  
Nancy Brown

NC 27021  
(336) 983-4047

**From:** [Robert Handelsman](#)  
**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:** Wednesday, July 08, 2020 11:10:43 PM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Robert Handelsman

IL 60201  
(847) 491-1950

**From:** [Tyra Pellerin](#)  
**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:** Wednesday, July 08, 2020 11:10:38 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Tyra Pellerin

LA 70122  
(504) 975-5208



**From:** [Carol Myers](#)  
**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:** Wednesday, July 08, 2020 11:08:26 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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Carol Myers

NY 11572  
(516) 764-4081

**From:** [S Nam](#)  
**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:** Wednesday, July 08, 2020 11:04:19 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
S Nam

NY 10040  
(141) 557-2610

**From:** [Natalie Houghton](#)  
**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:** Wednesday, July 08, 2020 11:02:33 PM

---

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:

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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. Yet NRC's proposed rule and supporting documents do not even once mention climate change or extreme weather events. It is both arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations, without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is NO "safe" level of radiation exposure: every exposure to ionizing radiation results in increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and

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NRC appears to be ignoring its prime responsibility to protect the public health and safety under the Atomic Energy Act, as amended in 1975, in favor of benefitting industry financial interests with lightened regulatory burden and streamlined licensing procedures. The public cannot have any confidence in this proposed regulation: it must be rejected.

Sincerely,  
Natalie Houghton

AZ 86305  
(928) 541-9601

**From:** [Stewart Casey](#)  
**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:** Wednesday, July 08, 2020 11:00:52 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:

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Sincerely,  
Stewart Casey

CA 92841  
(714) 638-9287



**From:** [Cynthia Morrell](#)  
**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:** Wednesday, July 08, 2020 11:00:13 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Cynthia Morrell

MA 01075  
(413) 532-1864

**From:** [Sue Malone](#)  
**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:** Wednesday, July 08, 2020 10:59:59 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!

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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.

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Sincerely,  
Sue Malone

MA 01581  
(508) 366-2050

**From:** [ingeborg.glier](#)  
**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:** Wednesday, July 08, 2020 10:58:06 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Ingeborg Glier

NV 89084  
(702) 476-5288

**From:** [Eric Decker](#)  
**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:** Wednesday, July 08, 2020 10:56:17 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Eric Decker

CA 95066  
(831) 438-9324



**From:** [Gabriel Varkonyi](#)  
**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:** Wednesday, July 08, 2020 10:55:09 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Gabriel Varkonyi

SK S7J 1G4  
(306) 227-6060

**From:** [carolyn.massey](#)  
**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:** Wednesday, July 08, 2020 10:53:55 PM

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Nuclear Regulatory Commission (EPZs)

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
carolyn massey

IL 62301  
(224) 433-4560

**From:** [Davin Peterson](#)  
**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:** Wednesday, July 08, 2020 10:53:49 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Davin Peterson

CA 95501  
(707) 498-3231

**From:** [B. Chan](#)  
**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:** Wednesday, July 08, 2020 10:48:53 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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
B. Chan

CA 92131  
(999) 999-9999



**From:** [Nathan Coles](#)  
**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:** Wednesday, July 08, 2020 10:48:08 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 ,

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Sincerely,  
Nathan Coles

TN 37027  
(615) 340-0801

**From:** [jennifer Smith](#)  
**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:** Wednesday, July 08, 2020 10:44:26 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 ,

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Sincerely,  
jennifer Smith

IL 60660  
(312) 999-9999

**From:** [Timothy Lippert](#)  
**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:** Wednesday, July 08, 2020 10:43:56 PM

---

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 ,

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Sincerely,  
Timothy Lippert

FL 33625

**From:** [joshua heffron](#)  
**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:** Wednesday, July 08, 2020 10:41:45 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
joshua heffron

NY 10028  
(917) 565-3280



**From:** [Melvin Zimmerman](#)  
**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:** Wednesday, July 08, 2020 10:41:32 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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Melvin Zimmerman

CA 93442  
(416) 466-7713

**From:** [Diane Hart](#)  
**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:** Wednesday, July 08, 2020 10:40:47 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!

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Sincerely,  
Diane Hart

NM 88012  
(248) 514-9922

**From:** [Kimberly Allen](#)  
**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:** Wednesday, July 08, 2020 10:37:30 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Kimberly Allen

TX 75243  
(214) 676-6385

**From:** [Susan Porter](#)  
**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:** Wednesday, July 08, 2020 10:36:20 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!

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Sincerely,  
Susan Porter

CA 91103  
(626) 794-1234



**From:** [J. Allen Feryok](#)  
**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:** Wednesday, July 08, 2020 10:31:06 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!

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
J. Allen Feryok

PA 15062  
724-684-

**From:** [Charles Miller](#)  
**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:** Wednesday, July 08, 2020 10:30:28 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Charles Miller

IL 60061  
(847) 549-3450

**From:** [Deborah Voves](#)  
**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:** Wednesday, July 08, 2020 10:25:19 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Deborah Voves

AK 99516  
(907) 345-2304

**From:** [ronald cook](#)  
**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:** Wednesday, July 08, 2020 10:21:52 PM

---

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 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.

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Sincerely,  
ronald cook

NY 14726  
(716) 287-3142



**From:** [virginia.jastromb](#)  
**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:** Wednesday, July 08, 2020 10:15:26 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!

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Sincerely,  
virginia jastromb

MA 01060  
(413) 727-3328

**From:** [Gaia Cooksey](#)  
**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:** Wednesday, July 08, 2020 10:12:10 PM

---

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 ,

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Sincerely,  
Gaia Cooksey

CO 80906  
(719) 632-3715

**From:** [Joseph Lipsey](#)  
**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:** Wednesday, July 08, 2020 10:08:11 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Joseph Lipsey

AZ 85750  
(520) 987-9877

**From:** [Beth Huizenga](#)  
**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:** Wednesday, July 08, 2020 10:08:09 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!

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Beth Huizenga

WI 53188  
(262) 542-0491



**From:** [janice.hoffman](#)  
**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:** Wednesday, July 08, 2020 10:06:11 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
janice hoffman

NM 88001  
(575) 523-4417

**From:** [Jenna Fallaw](#)  
**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:** Wednesday, July 08, 2020 10:05:19 PM

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Sincerely,  
Jenna Fallaw

MT 59715  
(406) 587-1973

**From:** [Bob Fischella](#)  
**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:** Wednesday, July 08, 2020 10:03:48 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Bob Fischella

AZ 85750  
(520) 299-3076

**From:** [f.olson](#)  
**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:** Wednesday, July 08, 2020 10:00:28 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!

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
f olson

NE 69101  
(308) 532-4488



**From:** [Monique Edwards](#)  
**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:** Wednesday, July 08, 2020 9:57:36 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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Monique Edwards

AZ 85742  
(520) 111-1111

**From:** [Nancy Currah](#)  
**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:** Wednesday, July 08, 2020 9:57:33 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:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Nancy Currah

WY 82601  
13073335425

**From:** [Joan Pratt](#)  
**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:** Wednesday, July 08, 2020 9:50:23 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 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.

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Sincerely,  
Joan Pratt

NH 03833

**From:** [Sara Hayes](#)  
**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:** Wednesday, July 08, 2020 9:49:19 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!

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Sincerely,  
Sara Hayes

CA 90814  
(562) 856-0558



**From:** [Richard Patenaude](#)  
**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:** Wednesday, July 08, 2020 9:49:15 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Richard Patenaude

CA 94541  
(510) 582-0211

**From:** [Donna Knipp](#)  
**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:** Wednesday, July 08, 2020 9:48:50 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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.

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Donna Knipp

NY 10034  
(111) 222-3333

**From:** [Scott Chase](#)  
**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:** Wednesday, July 08, 2020 9:48:48 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!

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Sincerely,  
Scott Chase

NY 12567  
(845) 625-8223

**From:** [Richard Booth](#)  
**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:** Wednesday, July 08, 2020 9:48:00 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Richard Booth

MI 48138  
(734) 818-3355



**From:** [Evan Hartman](#)  
**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:** Wednesday, July 08, 2020 9:46:30 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Evan Hartman

PA 19123  
(215) 235-6121

**From:** [Linda Prostko](#)  
**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:** Wednesday, July 08, 2020 9:46:11 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Linda Prostko

MI 49316  
(616) 891-9813

**From:** [Michael Wollman](#)  
**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:** Wednesday, July 08, 2020 9:44:20 PM

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Nuclear Regulatory Commission (EPZs)

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Michael Wollman

CA 93405  
(805) 234-4664

**From:** [Shanna Crockett](#)  
**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:** Wednesday, July 08, 2020 9:41:41 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Shanna Crockett

CT 06107



**From:** [Thomas Holubeck](#)  
**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:** Wednesday, July 08, 2020 9:41:19 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 ,

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Thomas Holubeck

OH 45215  
(513) 521-5545

**From:** [Karin Nelson-Rogers](#)  
**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:** Wednesday, July 08, 2020 9:40:32 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:

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Sincerely,  
Karin Nelson-Rogers

CO 80031

**From:** [Susan Space](#)  
**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:** Wednesday, July 08, 2020 9:34:14 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 ,

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Sincerely,  
Susan Space

MA 01360

**From:** [Gilda Fusilier](#)  
**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:** Wednesday, July 08, 2020 9:32:37 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 ,

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Sincerely,  
Gilda Fusilier

CA 95831  
(916) 393-1028



**From:** [Helene Rosen](#)  
**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:** Wednesday, July 08, 2020 9:30:33 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 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.

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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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
Helene Rosen

PA 18974  
(215) 443-5516

**From:** [Helene Rosen](#)  
**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:** Wednesday, July 08, 2020 9:30:30 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!

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Helene Rosen

PA 18974  
(215) 443-5516

**From:** [Warren Green](#)  
**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:** Wednesday, July 08, 2020 9:30:13 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Warren Green

NJ 07712  
(732) 555-1212

**From:** [Mitchell Maricque](#)  
**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:** Wednesday, July 08, 2020 9:27:21 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Mitchell Maricque

MI 49858  
(906) 352-4131



**From:** [Rosalind Bresnahan](#)  
**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:** Wednesday, July 08, 2020 9:27:20 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Rosalind Bresnahan

CA 92405  
(555) 555-5555

**From:** [carol weaver](#)  
**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:** Wednesday, July 08, 2020 9:26:06 PM

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Nuclear Regulatory Commission (EPZs)

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
carol weaver

NM 87571  
(575) 224-2408

**From:** [Pamela VourosCallahan](#)  
**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:** Wednesday, July 08, 2020 9:24:31 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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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,  
Pamela VourosCallahan

IN 46530  
(574) 273-6281

**From:** [F.Corr](#)  
**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:** Wednesday, July 08, 2020 9:22:32 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 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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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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,  
F Corr

MA 01351  
(123) 234-3456



**From:** [wes weaver](#)  
**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:** Wednesday, July 08, 2020 9:16:03 PM

---

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 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.

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Sincerely,  
wes weaver

NC 28607  
(828) 264-9316

**From:** [Tom Csuhra](#)  
**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:** Wednesday, July 08, 2020 9:12:24 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 ,

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Sincerely,  
Tom Csuhá

NE 68528  
(402) 770-6257

**From:** [Emily Bryant](#)  
**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:** Wednesday, July 08, 2020 9:11:28 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:

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Sincerely,  
Emily Bryant

CA 90720

**From:** [Chris Monti](#)  
**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:** Wednesday, July 08, 2020 9:10:10 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Chris Monti

OH 44039  
(440) 925-5557



**From:** [Karen Berger](#)  
**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:** Wednesday, July 08, 2020 9:08:45 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!

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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.

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Karen Berger

CA 91020  
(555) 555-5555

**From:** [Roberta Stern](#)  
**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:** Wednesday, July 08, 2020 9:07:35 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Roberta Stern

CA 94618  
(510) 655-6221

**From:** [Gaynelle Predmore](#)  
**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:** Wednesday, July 08, 2020 9:07:14 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Gaynelle Predmore

OH 43402  
(419) 354-1583

**From:** [jumpei kawakami](#)  
**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:** Wednesday, July 08, 2020 9:05:46 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
jumpei kawakami

ot 0383802  
(017) 275-3163



**From:** [Dennis Ledden](#)  
**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:** Wednesday, July 08, 2020 9:05:03 PM

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Nuclear Regulatory Commission (EPZs)

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In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Dennis Ledden

CA 95629  
(530) 620-4548

**From:** [Dennis Schaeff](#)  
**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:** Wednesday, July 08, 2020 9:00:55 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:

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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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

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Sincerely,  
Dennis Schaef

PA 16335  
(814) 333-3176

**From:** [Kay Olan](#)  
**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:** Wednesday, July 08, 2020 8:57:52 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!

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Commissioners and Staff of the Nuclear Regulatory Commission:

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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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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Sincerely,  
Kay Olan

NY 12831  
(518) 584-9270

**From:** [P.Willa](#)  
**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:** Wednesday, July 08, 2020 8:54:58 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:

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Sincerely,  
P Willa

MS 39110  
(601) 865-7039



**From:** [Aleks Kosowicz](#)  
**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:** Wednesday, July 08, 2020 8:52:55 PM

---

Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Aleks Kosowicz

WI 54101  
(920) 826-5678

**From:** [Kathy Abby](#)  
**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:** Wednesday, July 08, 2020 8:52:50 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Kathy Abby

ID 83301  
(208) 421-4575

**From:** [Linda Fielder](#)  
**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:** Wednesday, July 08, 2020 8:51:49 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 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 Federal Emergency Management Agency (FEMA). Instead, the proposed regulations would allow licensees to determine what the size of the EPZ should be (or whether offsite emergency planning is necessary at all), based on the probability that people would be exposed to more than 1000 millirems of radiation. This proposed rule change must be rejected.

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, ad hoc emergency response measures are inadequate, and that nuclear disasters present unique challenges requiring advance preparation and coordination with state and local agencies. NRC has affirmed the importance of requiring offsite emergency planning on multiple occasions since the requirements were adopted in 1980.

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. But NRC's proposed rule and supporting documents do not even mention climate change or extreme weather events once. It is arbitrary and capricious for NRC to promulgate nuclear safety and emergency planning regulations without taking into account the real-world conditions of the climate crisis.

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. The public bears the ultimate risk from a nuclear disaster. As the National Academy of Sciences affirmed in its seventh review of the Biological Effects of Ionizing Radiation (BEIR VII), there is no "safe" level of radiation exposure--every amount of ionizing radiation exposure results in an increased risk to a person's health. In addition, the Price-Anderson Act limits the nuclear industry's collective liability for radiological disasters at its facilities to only \$13 billion. Under the act, victims are left to seek damages from the federal government, forcing the public to sue our own government and ultimately requiring our fellow taxpayers to pay the bill for the industry's failures. In exchange for subjecting the public to what may ultimately be incalculable losses to health, family, career, community, and home, NRC licensees must create and maintain (and pay for) plans to enable people to get out of

harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

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It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
Linda Fielder

TX 75006  
(972) 824-7678

**From:** [Pati Tomsits](#)  
**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:** Wednesday, July 08, 2020 8:50:57 PM

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Nuclear Regulatory Commission (EPZs)

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Sincerely,  
Pati Tomsits

CA 92620  
(714) 555-5555



**From:** [Pati Tomsits](#)  
**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:** Wednesday, July 08, 2020 8:50:48 PM

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CA 92620  
(714) 555-5555

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**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:** Wednesday, July 08, 2020 8:50:37 PM

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Sincerely,  
Pati Tomsits

CA 92620  
(714) 555-5555

**From:** [Robert Koopmans](#)  
**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:** Wednesday, July 08, 2020 8:49:41 PM

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Sincerely,  
Robert Koopmans

IA 52601  
(319) 753-5484

**From:** [Susan Heath](#)  
**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:** Wednesday, July 08, 2020 8:48:37 PM

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harm's way when nuclear safety measures fail and probability estimates prove wrong.

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.

Large amounts of radiation requiring evacuation in the Fukushima Dai-Ichi and Chernobyl disasters extended far beyond the 10-mile radius evacuation zone NRC requires; in fact, the US government recommended that all US citizens within 50 miles of Fukushima Dai-Ichi evacuate in 2011. US Navy sailors on the USS Ronald Reagan, which was involved in relief efforts in the immediate aftermath of the Fukushima disaster, allegedly suffered illnesses from radiation exposure encountered up to 50 miles offshore. Also, restrictions on consumption of crops and food in locations more than 1,000 miles from Chernobyl are still in place today, though they are more than 20 times farther from the reactor site than NRC's current food and water ingestion pathway EPZ of 50 miles.

The small modular reactors (SMRs) and non-light-water reactors (NLWRs) this rule change would apply to are smaller than the Fukushima Dai-Ichi reactors and Chernobyl unit 4, but they would still contain large amounts of radiological material. The proposed NuScale SMR reactor design is rated for 50-60 MW, about one-tenth the size of Fukushima Dai-Ichi units 1 and 2; however, the NuScale SMR currently under design certification review is intended to be built with 12 reactor units in a single reactor building, making each NuScale plant equivalent to a conventional large reactor. As the Fukushima Dai-Ichi disaster proved, a single event can cause multiple reactor failures on the same site: all three operating reactors melted down; also, the unit 3 meltdown caused a hydrogen explosion at the shut-down unit 4, devastating the reactor building and leading to the potential for a spent fuel pool fire. The proposed Holtec SMR design is 160 MW, similar in size to the decommissioned Yankee Rowe LWR reactor in Massachusetts and the Fermi unit 1 sodium-cooled fast reactor, which had a partial meltdown in 1966.

It is arbitrary and capricious for 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.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, 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,  
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