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December 10, 2008

Mr. Peter Bamford
Project Manager for Three Mile Island
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Mailstop 08B3
Rockville, MD 20852

Dear Mr. Bamford:

I have your October 10 letter in response to the concerns about moving the Three Mile Island Joint Information Center from Susquehanna Township (just outside Harrisburg) to Coatesville, Pa., that I expressed in my letter to you on May 28, 2008. I would have responded somewhat sooner, but have just returned from an extended trip to California. I appreciate the attention the NRC staff gave my letter. Even so, I find your response dismaying. It indicates that there is not the focused, responsive, communication policy for nuclear plant emergencies that I thought existed and that the nation needs.

You advise that AmerGen, TMI's operator, in August changed its mind and withdrew its request to the NRC to move the TMI JIC to Coatesville because the NRC's approval wasn't actually necessary. The NRC staff, you note, has no problem with that decision because the effectiveness of the Coatesville JIC can be evaluated in inspections of the facility. That underplays the situation that would exist during a General Emergency at TMI – the “tangled web” of relationships that Professor Sharon Friedman depicted in the graphic I submitted with my letter and which can't be adequately simulated for an inspection. There comes a time for standing on principles and the principle that relationships would trump technology in a TMI General Emergency is paramount. We would likely find the utility advising residents around TMI that they need to leave their homes from what would be perceived as an exceptionally safe distance of 62 miles.

Your letter does not even acknowledge the concerns of public officials opposed to the relocation of the TMI JIC – like Harrisburg Mayor Stephen Reed and Middletown Mayor Robert Reed. And it seems to miss, as well, the founding concept of a Joint Information Center – that there should be only *one* JIC, one point for the release of official information on a nuclear emergency. The staff seems willing to substitute an electronic link – PEMA's satellite communications van – for the JIC itself. Broadcasting from Coatesville to what you refer to, revealingly, as “the PEMA JIC” in Harrisburg envisions *two* Joint Information Centers for TMI during a general emergency. While it is true that the State of Pennsylvania, through PEMA, would have a key role in response to a TMI emergency, the potential for confusion and conflict was minimized when TMI's JIC in Susquehanna Township was only a mile or so from PEMA's headquarters, not in Coatesville.

Further, the NRC staff seems entirely unwilling to look into the confusion that apparently exists among officials of the five TMI risk counties who, I was told by a PEMA spokesperson, did not oppose

Mr. Peter Bamford – 2

moving TMI's media center to Coatesville because there would also be a "near-site media center," presumably at the TMI Training Building. That center, however, would likely be unavailable during a General Emergency, with a radiation release occurring from the plant just across Highway 441.

In short, your well-intended response raises, for me, questions whether the communications lessons of the TMI-2 accident, and the reforms that followed, remain in force at the NRC and the Federal Emergency Management Agency (FEMA). FEMA would be responsible for overseeing the Coatesville JIC during a General Emergency, but it apparently wasn't included in the NRC staff's consideration of the move. The actual requirements for good, relational communication during a nuclear plant accident, should one occur again, seem unappreciated by the NRC staff.

Yours sincerely,



Douglas Bedell
Principal

cc: Matthew Boyer, U.S. Rep. Tim Holden's Office
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Ralph DeSantis, Amergen/Exelon
Dennis Fisher, WHTM-TV
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David Newhouse, Patriot-News
Barack Obama, President-elect
Beth Rapczynski, Exelon
The Hon. Stephen Reed, Harrisburg City
The Hon. Robert Reid, Middletown Borough
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NRC FORM 253 (9-96)		U.S. NUCLEAR REGULATORY COMMISSION		DATE OF REQUEST 12-16-08	CONTROL NUMBER
MESSENGER/COURIER RECEIPT					
TO: PETER BAMFORD, PRAT. MGR, TMI		OFFICE NRR	BUILDING OWFN	ROOM NUMBER 867/863 ^{m/s}	
FROM: RESOURCE RELATIONS		OFFICE ADM	BUILDING OWFN	ROOM NUMBER P137	
DESCRIPTION 7008 2810 0001 4316 3550		MESSENGER/COURIER SIGNATURE			
		MESSENGER/COURIER 		DATE RECEIVED 12-16-08	
				TIME RECEIVED 4:00 P	
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				TIME RECEIVED	
		RECIPIENT'S SIGNATURE			
		RECIPIENT 		DATE RECEIVED 12/23/08	
				TIME RECEIVED 10:00	
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