UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

METROPOLITAN EDISON COMPANY, et al, Docket No. 50-289

(Three Mile Island Nuclear Station Unit No. 1)

PEOPLE AGAINST NUCLEAR ENERGY DRAFT CONTENTIONS

Pursuant to 10 CFR 2.714(b) and the Atomic Safety and Licensing Board's Order of September 21, 1979, People Against Nuclear Energy (PANE) submits the following draft contentions:

1.) Renewed operation of Three Mile Island, Unit 1 (TMI 1) would cause severe psychological distress to PANE's members and other persons living in the vicinity of the reactor. The accident at Unit 2 has already impaired the health and sense of well being of these individuals, as evidenced by their feelings of increased anxiety, tension and fear, a sense of helplessness and such physical disorders as skin rashes, aggravated ulcers, and skeletal and muscular problems. Such manifestations of psychological distress have been seen in the aftermath of other disasters. The possibility that TMI Unit 1 will reopen severely aggravates these problems. As long as this possibility exists, PANE's

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members and other persons living in the communities around the plant will be unable to resolve and recover from the trauma which they have suffered. Operation of Unit 1 would be a constant reminder of the terror which they felt during the accident, and of the possibility that it will happen again. The distress caused by this ever present spectre [] of disaster makes it impossible for the NRC to operate TMI 1 without endangering the public health and safety.

2.) Renewed operation of TMI 1 would cause severe harm to the stability, cohesiveness and well being of the communities in the vicinity of the reactor. Community institutions have already been weakened as a result of a loss of citizen confidence in the ability of these institutions to function properly and in a helpful manner during a crisis. The potential for a reoccurrence of the accident will further stress the community infrastructure, causing increased loss of confidence and a breakdown of the social and political order. Sociologists such as Kai Erikson have documented similar phenomena in other communities following disasters.

The perception, created by the accident, that the communities near Three Mile Island are undesirable locations for business and industry, or for the establishment of law or medical practice, or homes compounds the damage to the viability of the communities. Community vitality depends upon the ability to attract and keep persons, such as teachers, doctors, lawyers, and businesses critical to

1178 172

-2-

economic and social health. The potential for another accident, should TMI 1 be allowed to operate, would compound and make permanent the damage, trapping the residents in disintegrating and dying communities and discouraging the influx of essential growth.

3.) Evacuation planning done by Metropolitan Edison and the Nuclear Regulacory Commission is inadequate to assure the safety of the public, particularly those persons living within a five mile radius of the plant. Operation of TMI 1 should not be resumed until a plan is in place for the evacuation of the public in the maximum area which could be affected by an accident.

Respectfully submitted,

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1178 173

-3-