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August 25, 1980

Bernard J. Snyder, Program Director  
Three Mile Island Program Office  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

RE: PEIS for TMI Clean-up


Dear Mr. Snyder:

On August 14, you sent the Union of Concerned Scientists a copy of the Programmatic Environmental Impact Statement for the cleanup of Three Mile Island Unit 2. Your cover letter indicates that comments will be accepted for 45 days. In our view, 45 days is far too short a period of time in which to disseminate and review this massive document and to draft comments which address the very great number of technical and policy issues which it raises. Therefore, we request that the comment period be expanded to at least 90 days.

It is also our view that public hearings should be held on this statement in accord with the Council on Environmental Quality regulations, which call for such hearings when there is "substantial environmental controversy concerning the proposed action or substantial interest in holding the hearing." 40 CFR §1506.6(c)(1). There can be little question that this situation qualifies under those criteria.

The cleanup of TMI-2 will cover a span of at least 5 years and will call for the application of new and untried techniques on a large scale. Under these circumstances, the broadest possible public participation should be sought. The 45-day time limit is wholly artificial and inconsistent with that goal.

Very truly yours,

  
Ellyn R. Weiss

ERW/lc

cc: Each Commissioner

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8/31/80