

Three Mile Island Public Interest Resource Center

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Dr. Bernard J. Snyder
Director
TMI Program Office
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

27 August 1980

Dear Dr. Snyder:

On August 15, I obtained a copy of the Programmatic Environmental Impact Statement (Draft NUREG-0683) at NRC's Middletown Office. I also received a copy of a letter which went out over your signature which enclosed a Notice of Availability of the PEIS and four pages of errata. Your cover letter indicates that the public comment period on the PEIS will run for 45 days, and the Notice of Availability states that the comment period will end on 6 October 1980. In the view of the Board of Directors of the Resource Center (a view which I share), the 45 day public comment period far too short a time in which to expect non-technical members of the public to review and comment upon such a lengthy and technically detailed document.

The Resource Center has requested and your office has agreed to send copies of the PEIS to 51 persons designated by the Resource Center. The Resource Center is awaiting the comments of those persons on the list before preparing final comments on the PEIS. Many individuals represented on the Resource Center Board of Directors are also awaiting receipt of the comments of recognized national experts before finalizing their own comments. Given these constraints and recognizing the supreme importance which the cleanup process has in terms of the future health and safety of the people living in Central Pennsylvania and the people living downstream of TMI along the Susquehanna River and Chesapeake Bay, the Resource Center requests that the comment period on the PEIS be extended to at least 90 days.

It is also apparent that public hearings on the PEIS should be held prior to the drafting of the final version. Council on Environmental Quality regulations clearly 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 no question that the PEIS qualifies under these provisions.

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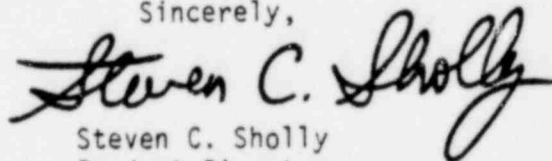
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Every major re-examination of the cleanup process has resulted in both a lengthening of the time required to complete cleanup and a substantial increase in the cost. The Kemeny Commission estimated that cleanup would require 2-4 years and cost \$80-200 million. The most recent estimates by Metropolitan Edison Company, as set forth in the August 1980 edition of "TMI Today" set the cleanup period at five years and set the cost at over \$500 million. This cost excludes the costs of replacement power which the utility must purchase.

The cleanup will call for the use of new procedures and equipment on a decontamination program which has never before been attempted on this scale. Clearly, these circumstances require the broadest public participation in the decision-making process. The 45-day comment period deadline is inconsistent with such participation and represents an artificial constraint on the rightful involvement of the public in this important matter.

Sincerely,



Steven C. Sholly
Project Director
Three Mile Island Public
Interest Resource Center

cc: Commissioner John Ahearne
Commissioner Peter Bradford
Commissioner Victor Gilinsky
Commissioner Joseph Hendrie
Mr. Matthew Bihls, EPA
Mr. Gus Speth, CEQ
Mr. Nicholas Yost, CEQ
Rep. Allen Ertel
State Rep. Stephen Reed
Ms. Eilyn Weiss, Esq.
Ms. Coral Ryan, NIRS