U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Sept. 3, 1980

To Whom It May Concern:

These comments focus on the recent Draft Programmatic Environmental Impact Statement on TMI-2 and, specifically, on sections of that report related to the psychological stress issue.

While the issue of psychological stress is a critical one which the NRC staff wishes had never been raised, it is unfair to attempt to dismiss it as irrational. One expects a more evenhanded discussion from the NRC. I am disappointed at the tenor of the comments on psychological stress because they seem to imply that residents in the TMI area with misgivings about the competence and/or truthfulness of utility and regulatory officials are unreasonable. Let me call your attention to only two typical sections:

p. 3-23: In addition to being a rather poorly written discussion of psychological stress (3.1.7), this section seems to suggest that persons concerned about what might happen are silly. A strong case could be made that the regulatory officials who refused to even consider the nuclear opponents' "what ifs" were the arrogant, myopic and silly ones in view of the actual accident. Who, even among the most staunch defenders of nuclear power, would now want to defend locating TMI so near a large population center? Although the writers of this section suggest that fear of nuclear technology is unwarranted and even a sign of mental unbalance, their own cavalier attitude in the face of such a potentially dangerous technology seems to me the more unhealthy psychological problem. The use of the adjective "phobic" to refer to residents' fears (p. 3-24), for example, suggests an attitude of superiority on the part of the writers which is hardly justified in view of the actual events at TMI in March, 1979.

p. 10-24: This section seems to suggest that the writers know the long-range impact of the "accident water" on human persons (just as other sections suggest the writers know the long-range impact of the krypton and other radioactive gases). Is there any scientific evidence showing that small residues of tritium in the drinking water are completely harmless? If so, do mention them because area residents are interested in searching them out. If not, then where does the staff find support for its assertion that only "negligible health effects" will follow accidental spills?

Another question on same section: Why use "phobic" in the last complete paragraph of p. 10-24 unless it is meant to suggest that the residents in the TMI area are unbalanced if they do not trust those in charge of TMI-2 cleanup? Does the staff realize that this paints at least 60 percent of the residents living within five miles of the nuclear facilities "phobic"? Does such arrogance serve the interests of either the NRC or the public?

There are numerous additional problems with the report which undermine the readers' confidence. Footnote 66 on p. 3-27, for example, has no place in an allegedly scientific report. I'm very disappointed at the obvious lack of objectivity and empathy for local citizens.

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