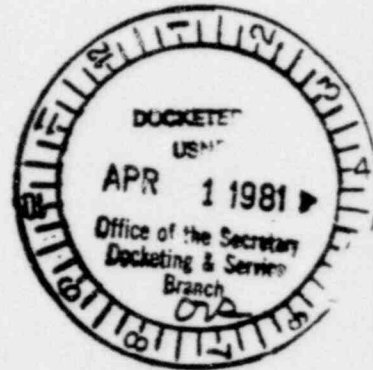




3/11/81

United States of America

Nuclear Regulatory Commission



Before the Atomic Safety and Licensing Board

In the Matter of	/	
Metropolitan Edison Company	/	
(Three Mile Island Nuclear	/	Docket No. 50-289
Station, Unit No. 1)	/	

Statement of
 ECNP, Newberry Township TMI
 Steering Committee, TMIA
 and Aamodt Family
 on Emergency Planning Requirements

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Newberry Township TMI Steering Committee, TMIA, ECNP, and the Aamodt Family respectfully submit that the following should be the emergency planning requirements considered in this proceeding:

1. Prior to restart of TMI-1 the emergency plans must comply with the requirements of NUREG - 0654.

2. The Licensee must prior to restart demonstrate not only reasonable progress toward meeting the requirements of the Commission's Emergency planning regulations but also demonstrate that the plans submitted by the Licensee are practical, coordinated and can reasonably be relied upon to work.

The Commonwealth and Licensee have not demonstrated competence in nearly two years to develop a complete plan.

- a. Disagreement as late as 3/11/81 about the proper positioning of the Director of Emergency Operations.
- b. Lack of dedicated lines in sensitive areas of notification.
- c. No demonstration of readiness of local support organizations.
- d. No public information plan designed or operational.

Since this was the site of the most serious commercial nuclear accident, public cooperation in developing the Emergency Plan will be hindered.

- a. Opening before emergency readiness would be a powerful and negative public information lesson.
 1. Plans would not be taken seriously.
 2. Voluntary participation would be affected.

Likelihood of an accident at TMI-1 is greater than elsewhere.

- a. Uncertain conditions at TMI-2 can draw manpower.
- b. No demonstration that there will be sufficient licensed personnel to perform technical functions.
- c. Essentially same management under which accident occurred at TMI-2.

The population in the 10 and 50 mile EPZs of TMI-1 is among the six biggest concentrated around an operating nuclear power plant in the United States.

Compliance after restart would fall within the purview of NRC but would be outside the financial capabilities to initiate and sustain effective intervention by the public.

Licensee has demonstrated seemingly deceptive response to the Commission's Order to augment training by sponsoring conclusions in the Revision of the OARP that are not supported within the review or by the testimony of a panel of expert witnesses. Response in the area of emergency planning, particularly when outside the consideration of the Board, can not be expected to be adequate.

Since this was the site of an accident and the population has been injured, any damage that would occur through lack of a complete Emergency Plan would be cumulative, cruel and unjust.

- a. Exposure of children is particularly to be considered.
- b. Psychological injury would be deep and permanent.
- c. Financial injury would escalate.

Respectfully submitted,
NEWBERRY TOWNSHIP TMI STEERING COMMITTEE

By: 