

My name is Hal Nettleship. I'm speaking for ANGRY, the anti-nuclear group representing York. We are involved in this hearing principally on the issue of Emergency Planning, our contentiob being t at the present emergency plans are inadequate; that if another accident occurred the plans we have now would probably not work !

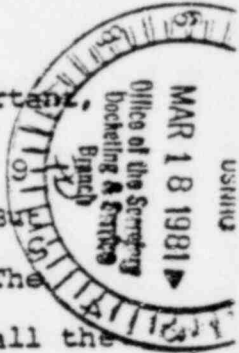
This is an important issue because you, the Board, have already ruled that TMI-1 cannot be allowed to operate before there are adequate and effectuated plans in place. You agreed to that over a year ago as ANGRY contention #1. If the record shows that the plans are not adequate or effectuated -- then you will be bound to keep the plant shut until the state, the counties and MET ED make their plans ~~is~~ adequate.

I think that phrase "adequate and effectuated" is pretty important, and I'd like to go into it a little more.

I think we all understand that the plans should be adequate. But really, the word effectuated is more important, for this reason: The word means, "can the plan be put into effect" ? A plan can meet all the applicable regulations on paper, but if we can't put it into effect, it's really worthless. Indeed, worse, in that the public will be told there is a plan in place, when there really is no plan. If another accident were to occur, and attempsts were made to put the plan into effect, the public would suffer again.

In my judgment, this is the situation in which the Board now finds itself:- When the NRC gave operating licenses to TMI-1 and 2, it assured the public that the Emergency Plans for TMI were adequate to protect the public health and safety....They met the "applicable regulations".

But then we had the Class 9 accident at TMI-2, and we found out that the plans did not work. The plans looked fine on paper, but in a real emergency, the state, the counties and MET ED were not prepared to carry them out. Your regulations were not good enough.



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Because of what happened two years ago, you, as representatives of the NRC, are in a very unusual situation. Because the NRC approved plans that turned out to be worthless, the people in this area have lost confidence in the NRC. In a very real sense, it is not just MED ED that's on trial in this hearing. The entire NRC is on trial. At the same time you're trying to judge TMI-1's fitness to operate, you should be aware that the people here are watching and judging you.

What all this means is - that if the NRC wants to win back the public's confidence, it will be necessary to be much more thorough than your predecessors have been. It will not be enough to say that the plans meet the current regulations, even though the regulations now are much stricter than they were two years ago. You're going to have to investigate whether the plans can actually be put into effect !

This means, at least, full compliance with Nureg 0654. And, it means compliance must be demonstrated in public hearings.

If the record shows that the communications systems are dependent on telephones that may be jammed in the event of an emergency, then other systems must be installed.

If the municipal plans are not ready, now-two years after the accident, the board must find out why the plans are not now ready. ..You must also find out if it is reasonable to think these plans will ever be ready, or if the municipal governments have the ability to make plans, carry them out and pay for required equipment without much more financial assistance.

If the plans do not now meet with approval from the Federal Emergency Management Agency, it should be incumbent upon you, the board, to find out why, two years after the accident, the plans are still not adequate.

What you must NOT do is assume that the plans and deficiencies will be fixed sometime after the hearings. The State and the licensee have had plenty of time already. We, and other intervenors, have provided detailed ~~xx~~ and specific faults in the plans for them to correct. This is an extraordinary

contributions for citizens to make. We want results, not more empty promises.

If you do not determine that the plans are adequate and effectuated during the hearings, when the state and the licensee have had two years to work on them, you must not leave us with the empty promise that the plans will be ready at some nebulous time in the future.

Your role, and the role of the NRC as a whole, is to protect us. Not to protect the licensee's investment, but to protect us !

The NRC failed us before. The NRC allowed TMI to operate before without adequate management, without adequate safety back-ups, and without adequate plans. You allowed TMI-2 to operate and to have a Class 9 accident.

The NRC's "MOUNTAIN WEST" Study showed that we citizens had to spend \$94 million to evacuate. The courts have awarded \$25 million in a class action suit. Nothing will ever repay or repair the damages you caused us before by allowing TMI to operate. We will never be able to forget the sufferings you caused us.

We think Three Mile Island should never be permitted to operate again. We will have to live with the cleanup at TMI-2 for decades. The York City Council recently passed a resolution against allowing TMI to operate before the cleanup is complete, and we agree with that, too.

You failed us before and you will fail us again if you do not find out that the management is competent, the plant safety systems are adequate, and the emergency planning is complete, before you decide on whether or not to allow restart. You owe it to us. It is not our responsibility to prove our case to you, it is your responsibility to protect the public.

I'd like to speak of one other concern. Under normal NRC practice, if you decide the emergency plans are not good enough, you will give the NRC staff the power to allow restart, as soon as the staff decided that the plans have been sufficiently improved. I think that you should avoid doing that in this hearing. The NRC should reconvene this hearing when the time comes to check on implementation of impro

comes to check on implementation of improvements. A quiet staff decision on the restart would just reinforce our mistrust. The NRC can't win back the public's confidence if it goes back to operating in the dark.

Only a full and open hearing, which considers the real world, as well as the paper plans, can begin to win back the public confidence that will be so necessary during the coming years of cleanup.

You owe it to us.

Thank you for coming out to hear our statements.