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PROD. & CIRC. NO. 80-289

EMO

from the desk of:
TANYA RICHTER

3/24/81

DEAR Reader:

Enclosed are comments
which were addressed to
the Safety and Licensing
Board, but which I
would also like the
NRC Commissioners to
have.

Sincerely,

Tanya Richter



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3/3/81

To: Mr. Ivan Smith, Atomic Safety and Licensing Board Chairman
From: Tanya Thomas Richter, 102 E. Locust St., Annville, PA 17003
Re: Comments submitted in lieu of an appearance at the public comment session in the TMI Unit I restart hearings.

It is ironic that in stating my objections to the restart of Met Ed's unit I, that I must appeal to the very same agency which was responsible for licensing Unit II; which was soundly castigated for its failures by the Kemeny Commission; which is being sued by GPU for having negligently failed to perform its duty; and which has remained impervious to necessary and recommended changes. In the past months the NRC received low marks from the Nuclear Safety Oversight Committee, appointed by ex-President Carter, for its failure to monitor safety reforms following TMI.

The inherent prejudices of the NRC are of utmost concern to me. How can the public possibly get a fair hearing? The very same agency whose function is to render an objective judgment for the restart of this plant on the basis of the health and safety of the public has been and remains to have an orientation toward nuclear advocacy.

An example of this advocacy position taken by the NRC is demonstrated by the recent recommendation made by the NRC staff to relicense, on a low power basis, to help alleviate alleged projected power shortages in the Pennsylvania, New Jersey, Maryland (PJM) grid. Since when is it the function of the NRC to plan for the power needs of the PJM grid? Since when is it their function to predict brownouts and blackouts? Never mind that their argument is a specious one. The function they assumed is not their Congressional mandate.

James Tourtelotte, of the NRC staff stated that "The staff considers that the consequences of an accident while operating at 5 per cent power are sufficiently small." This is cold comfort to a public which had been assured that a Unit II type accident was extremely remote.

Considering Unit I's proximity to Unit II, prudence would dictate the delay of the decision of restart till the continuing hazard which exists on the island has been eliminated, particularly in light of the fact that the clean-up is a giant experiment.

Inadequate emergency management plans were a major concern to the Kemeny Commission. For instance, one of their findings was that potassium iodide, a blocking agent to prevent the accumulation of radioiodine in the thyroid gland, was not available. On February 26, 1981, I spoke with Clyde Miller of the Lebanon County Emergency Management Agency. I asked him that if we had a nuclear accident tomorrow which would require the use of potassium iodide, would it be available. He stated that it had been ordered but he did not have it...TWO YEARS AFTER THE ACCIDENT!

The Lebanon County Emergency Management Agency's "Emergency Operations Plan- Radiation Incidents- Three Mile Island Nuclear Power Plant" is

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inadequate to handle a serious accident. The evacuation plan channels the population out onto roads which are inadequate to handle the volume of traffic. The general public remains no more knowledgeable now about evacuation than before the accident. Key institutions, particularly schools remain uninformed about specifics of the plan. Were an accident to occur tomorrow, the evacuation situation would be only slightly more effective than it was before March, 28, 1979.

If these public input meetings are not simply pro forma, I would be very much surprised. Particularly in light of a comment made by Joseph Hendrie, and NRC Commissioner who stated: "Congress has already decided that the country is to have a nuclear power program, even if it makes some people uneasy." In other words, public opinion doesn't count even though we have subjected to two incredibly stress filled years because of a near disastrous accident and subsequent clean up of which the full effects will not be known for thirty years.

As a Met-Ed ratepayer, I would rather continue paying higher electric bills, along with adopting strict conservation measures than be subjected to the mental anguish of anticipating another accident, however remote.

I object to the burden of proof being placed on me to justify why Unit 1 should not be restarted. Both the NRC and the utility should have to prove to me beyond a doubt why it should be restarted!

