

# HARMON & WEISS

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March 18, 1982

William H. Regan, Jr.  
Chief, Siting Analysis Branch  
U.S. Nuclear Regulatory Commission  
4550 Montgomery Avenue  
Room 5109  
Bethesda, Maryland



Dear Bill:

I am enclosing a copy of Dr. Holt's "Comment on Psychological Stress Workshop," which he submitted to Mitre.

I believe he has already sent a copy to Don Cleary.

You will note that Dr. Holt has responded to two major points that have been raised by your staff. First, he has set out a clear theoretical and conceptual basis for approaching the prediction of psychological health impacts. Second, he has outlined the essentials of the type of study that is needed to make the required predictions. Since this was written under the deadline for submittals to Mitre, it does not include extensive references, but is similar to the workshop discussion itself. We can provide references and supporting materials as necessary. In addition, we are prepared to advise or assist in developing the instruments and other materials to be used in further research.

We emphasize three points based on Dr. Holt's discussion, the Mitre workshop, and the meeting in Middletown. First,

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the existing TMI studies were not intended to and do not address the specific question of predicting the psychological health impacts of restarting TMI-1. Accordingly, a study such as that outlined by Dr. Holt is necessary to comply with the Court's mandate.

Second, the recent false alarm that we discussed at length in Middletown was a highly significant event for those living in the area and appears to have triggered an unusually high rate of "unobtrusive indicators" in the community, including particularly a high rate of emergency ambulance calls. Based on the statements of PANE's members at the meeting, it also resulted in a very high level of concern and even a flight reaction seemingly out of proportion to the threat, or even the perceived threat. On their face, these appear to be indicators of a high level of chronic stress still existing in the area almost three years after the accident, stress that continues, although theoretically the stressor has been partially removed by the fact that neither reactor is in operation.

In this circumstance, it is crucial that the NRC undertake a careful study of the false alarm incident and similar incidents since the accident. This is particularly important in view of the Mileti unobtrusive indicators study, which I understand to have found very little, if any, significant

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impact. It may be that existing chronic stress levels do not significantly change such indicators in normal circumstances, but that incidents such as the false alarm do cause unusually high rates of such indicators, demonstrating the continuing stress levels. Accordingly, the unobtrusive indicators during and after the false alarm should be examined. The individual reactions to the event should also be studied through the research proposed by Dr. Holt.

Third, we are concerned that restart may be seen as a single event, throwing the switch, that will occur on a given day, and after which the stress will gradually diminish. That concept misses the entire point. Restart is not a single event, but a continuum that lasts as long as the reactor is in operation and until it is decommissioned. No doubt particular events such as the restart itself will be times of higher stress, although it would not surprise me if the days surrounding restart itself would not be a time when there is a significant perception of threat simply because everyone will know that GPU is paying very careful attention because it is under such close scrutiny. The problem comes afterwards when GPU is perceived as paying the same attention to its responsibilities as it was on March 28, 1979. In any event, the point is that the threat to psychological health derives not only from the moment of restart, but from the

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ever present spectre of the reactor in routine operation. This must be taken into account in any studies undertaken or conclusions reached by the NRC.

Finally, I want to express our appreciation for the meeting in Middletown. While I am sure you realize that PANE remains skeptical in dealing with the NRC, we welcome what we viewed as your responsiveness during the meeting. I also appreciate your commitment to ignore or extent arbitrary and artificial deadlines in order to assure that you undertake a responsible evaluation of the issues. We will work with you in that spirit. I suspect that the perception of an honest, complete, and unbiased effort in preparing the Environmental Assessment could do more than anything else to improve the credibility of the NRC in the area, and perhaps even to mitigate some of the existing stress.

Sincerely,



William S. Jordan, III

cc: George F. Trowbridge, Esq.