



## Office of the Mayor

The City of Harrisburg

City Government Center

Harrisburg, PA 17101-1678

Stephen R. Reed  
Mayor

July 27, 1994

Mr. William T. Russell, Director  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Russell:

Mr. Robert Gary of the Pennsylvania Institute For Clean Air has shared with me a copy of your recent June 10, 1994 correspondence, a copy of which is attached for your reference.

I believe it necessary and important to set forth the City of Harrisburg's view on the issue in question. We do, in fact, have an All-Hazards Emergency Management Plan which, of course, does cover a major radiological incident at Three Mile Island, given our proximity to the plant.

We do not believe, however, that there are sufficient identified resources to meet what would be the likely contingencies in the event that an evacuation would be ordered in this region as a result of a major event at Three Mile Island. Presently, the plan of this and every other community in this region, including the plan of Dauphin County, of which we are the county seat, is limited to the deployment of resources and the taking of evacuation actions in the ten mile radius area of TMI.

We know from the practical experience of the 1979 accident as well as by other means that if an evacuation actually was ordered for the ten mile radius area, there would be a simultaneous massive exodus from virtually all of the contiguous areas. In the case of the City of Harrisburg, the ten mile radius boundary includes the southern portion of this City but not the rest of Harrisburg. We have not the slightest doubt that, if an evacuation began, there would be mass movement by the rest of this City, clogging the evacuation routes and creating a demand for facilities, personnel, transportation vehicles and other resources far beyond that which have been provided for in the plan. This circumstance is not unique to the City of Harrisburg and, in fact, would almost certainly be the case in all the other municipalities in this region similarly located.

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Mr. William T. Russell  
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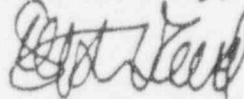
It is also our belief, based upon the practical experience of the 1979 accident, that even the mere suggestion that an evacuation was being considered or that such could occur as a result of an unfolding event at TMI, that people would begin an unscheduled and unauthorized evacuation of major proportion. This is precisely what occurred in 1979, when no mass evacuation was ever ordered. The estimates vary as to the actual number of persons who departed the area but it is not unreasonable to assert that the number was somewhere between 70,000 to 100,000 area residents. The Interstate highways and other main corridors were jammed for hours with departing vehicles, even amidst various assurances from Federal, plant and other officials that no such evacuation was warranted.

In truth, therefore, the "magic line" of the ten mile radius does not reflect the reality of what would occur in the event of a major radiological incident here. Our view is therefore simple but direct: emergency management planning around Three Mile Island should reflect what is the likely scenario rather than a bureaucratic belief that a ten mile radius area plan is adequate or more than sufficient. To accomplish planning for a likely scenario would involve the introduction of substantial additional resources to those which are already included in the county and various municipal emergency management plans here. It would also require added planning to accommodate the use and deployment of such resources.

Based upon this additional or new information being provided by the City of Harrisburg, we believe that the NRC should revisit the Director's Decision which reinforced the inadequate view that existing ten mile radius zone planning would fully meet the real needs of the region surrounding Three Mile Island.

With warmest personal regards, I am

Yours sincerely,



Stephen R. Reed  
Mayor

SRR/psr-j



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 10, 1994

Mr. Robert Gary  
The Pennsylvania Institute for Clean Air  
2211 Washington Avenue  
Silver Spring, Maryland 20910

Dear Mr. Gary:

Your letter of May 9, 1994, to Chairman Selin has been referred to this office for response. The letter Chairman Selin sent to you on May 6, 1994, explains why the Commission had decided not to take formal review of Director's Decision DD-94-03. It would, therefore, not be productive to revisit the details and rationale for that decision at this time. I wish to assure you that, contrary to your statement that your petition has not been taken seriously, the issues you raised in your petition were considered by the U.S. Nuclear Regulatory Commission (NRC) and other involved agencies. Your letter of May 9 provides no information or argument that was not already supplied and considered before the Director's Decision was issued. Your letter, therefore, provides no basis for the NRC staff to reconsider the Director's Decision.

I would make a few remarks regarding the state of emergency planning in the vicinity of the Three Mile Island (TMI) Nuclear Generating Station. Your 10 CFR 2.206 petition of July 10, 1992, regarding deficiencies in the Dauphin County Emergency Plan, resulted in the principal organizations involved in emergency planning in the Harrisburg area taking a closer look at a number of issues, including transportation agreements and phone lists. The resultant reviews have hopefully provided added confidence in emergency preparedness to the citizens of that area. I believe that emergency planning in the Harrisburg area has been carefully scrutinized during the past 15 years as a result of the 1979 accident at TMI, Unit 2. As you know, the accident resulted in a number of new NRC requirements with regard to emergency planning, not only for TMI but for all nuclear power plants in the United States. One process that assures continuing adequacy of emergency planning in the area surrounding TMI is the biennial full-participation exercise. During these exercises, the Federal Emergency Management Agency (FEMA) evaluates the TMI offsite emergency plans (State, county, and municipalities). During the last full-participation exercise at TMI in May 1993, FEMA did not identify any deficiencies in the implementation of those plans.

With regard to emergency planning by the City of Harrisburg, Mayor Stephen R. Reed acknowledged in a letter to you dated February 8, 1993, that the City of Harrisburg does have an evacuation plan. His letter also stated that city officials have sufficient identified resources in the plan to evacuate portions of the city outside the emergency planning zone and have demonstrated limited mobilization of transportation resources during city-conducted exercises.

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Mr. Robert Gary

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June 10, 1994

We continue to conclude that the state of emergency planning in the Harrisburg area, in particular, as well as in other municipalities in the vicinity of TMI, offers reasonable assurance that the public will be adequately protected in the unlikely event of a radiological emergency at TMI, and that effective ongoing review provisions are in place to keep this planning at an acceptable level.

Sincerely,



William T. Russell, Director  
Office of Nuclear Reactor Regulation

cc: See next page

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# PICA

The Pennsylvania Institute for Clean Air

'94 AUG -3 P3:58

Office of the Senior Researcher, 2211 Washington Avenue  
Silver Spring, Maryland, 20910 Telephone (301) 587-7147

August 1, 1994

John C. Hoyle  
Secretary to the Commission  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Dear Mr. Hoyle,

Please file the enclosed three items:

Letter to Dr. Selin

Letter to Director Russell from PICA

Letter to Director Russell from Mayor Reed

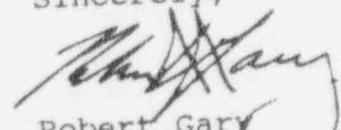
in the record of proceedings for PICA's 2.206 Request which resulted in Director's Decision DD-94-03.

We hereby officially request that those proceedings be reviewed by the Commissioners based on unilateral mistakes of fact made by the NRC and reflected in the Director's Decision at pages 29 and 30 and Director Russell's letter to PICA dated June 10, 1994.

These mistakes are highly german and material to the result reached by the Directors. They have been corrected as expeditiously as possible and in a timely manner by PICA and Mayor Reed.

We want an order providing for a Belated Commissioner's Level Reconsideration in our 2.206 Request. We regard the Director's Decision as invalid and nugatory and we think any Federal Court would so regard it.

Sincerely,



Robert Gary  
Senior Researcher  
for PICA

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