

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY,	)	Docket No. 50-289
<u>et al.</u> ,	)	(Restart)
(Three Mile Island Nuclear	)	
Station, Unit No. 1)	)	

PEOPLE AGAINST NUCLEAR ENERGY  
PRELIMINARY PLAN FOR PRESENTATION OF EVIDENCE  
ON PSYCHOLOGICAL DISTRESS

---

People Against Nuclear Energy (PANE) is in the early stages of developing the case that it will present on the issue of psychological distress. PANE has spoken to several potential expert witnesses and has investigated the various studies that have been or are now being done on the issue. On the basis of these discussions and investigations, PANE submits the tentative plan for presentation of evidence set out below.

PANE's case on psychological distress will consist of four parts: (1) evaluation of studies done by others on the psychological impacts of the accident, (2) presentation of a comprehensive study to be done by PANE's expert witnesses on impacts in the area within five miles of TMI, (3) testimony of individuals concerning their own experiences, and (4) the conclusions of PANE's expert witnesses concerning the psychological and community health impacts of the TMI Unit 2 accident and of the renewed operation of TMI Unit 1.

In addressing existing and ongoing studies PANE's experts will evaluate the quality of each study and how the study's

1370 336

7911200002

conclusions relate to the particular issues in this case. They will also explain the additional information that is needed in order to reach valid conclusions on the issues before the NRC.

In order to provide that additional information and to assure that the interests of its members and their neighbors and communities are considered, PANE expects to conduct a comprehensive evaluation of psychological and community health impacts in the area within five miles of the reactors. This will be accomplished either by canvassing large numbers of residents or by selecting a smaller number through a sampling process. The choice depends upon the resources available to PANE and upon the advice of PANE's experts. In either case, the study will involve thorough psychological evaluation through both standardized testing and intense individual interviews. In addition, PANE will present evidence concerning property values, population changes, vandalism, business decline, and other indicia of community health.

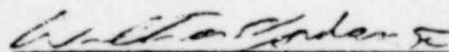
The third part of PANE's presentation will be the testimony of area residents about their experiences since the accident and their reactions to the possible renewed operation of TMI Unit 1. These witnesses will provide the Licensing Board with a representative sample of the psychological effects found by the various studies and by PANE's experts.

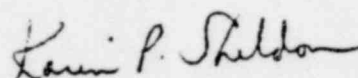
Finally, PANE's experts will discuss their conclusions concerning both the long and short-term psychological and community health impacts of the accident itself and of the proposed restart of TMI Unit 1.

In presenting this plan, PANE emphasizes that it is tentative and may change significantly before the hearing begins. The

Report of the President's Commission on the Accident at Three Mile Island, which includes a study on behavioral impacts of the accident, has only just been released, and other studies have not yet been completed. In addition, PANE has not been able to finalize arrangements with expert witnesses because the Commission has not yet decided to consider these issues. For that reason, this can only be considered as a tentative outline of PANE's presentation.

Respectfully submitted,

  
William S. Jordan, III

  
Karin P. Sheldon  
SHELDON, HARMON & WEISS  
1725 I Street, N.W.  
Suite 506  
Washington, D.C. 20006  
(202) 833-9070

DATED: November 2, 1979

1370 338

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY,	)	
et al.,	)	Docket No. 50-289
(Three Mile Island Nuclear	)	
Station, Unit No. 1	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of "People Against Nuclear Energy Preliminary Plan for Presentation of Evidence on Psychological Distress" was mailed first class postage prepaid this 2nd day of November, 1979 to the following:

Secretary of the Commission (21)  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
ATTN: Chief, Docketing & Service Section  
James A. Tourtellotte, Esquire (4)  
Office of the Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Steven C. Sholly  
304 South Market Street  
Mechanicsburg, PA. 17055

Jordan D. Cunningham, Esquire  
Fox, Farr & Cunningham  
2320 North Second Street  
Harrisburg, PA. 17110

Karin W. Carter, Esquire  
Assistant Attorney General  
505 Executive House  
P.O. Box 2357  
Harrisburg, PA. 17120

Frieda Berryhill  
Coalition for Nuclear Power Postponement  
2610 Grendon Drive  
Wilmington, Delaware 19808

1370 339

Cert. of Service  
Docket No. 50-289

Ms. Holly S. Keck  
Anti-Nuclear Group Representing York  
245 W. Philadelphia Street  
York, PA. 17404

Walter W. Cohen, Consumer Advocate  
Department of Justice  
Strawberry Square, 14th Floor  
Harrisburg, PA. 17127

Robert L. Knupp, Esquire  
Assistant Solicitor  
County of Dauphin  
P.O. Box P  
407 North Front Street  
Harrisburg, PA 17108

Chauncey Kepford  
Judith E. Johnsrud  
Environmental Coalition on  
Nuclear Power  
433 Orlando Avenue  
State College, PA. 16801

John A. Levin, Esquire  
Assistant Counsel  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17120

Robert Q. Pollard  
Chesapeake Energy Alliance  
609 Montpelier Street  
Baltimore, Maryland 21218

Kathy McCaughin  
Authorized Representative for  
Three Mile Island Alert, Inc.  
23 South 21st Street  
Harrisburg, PA 17104

Marvin I. Lewis  
6504 Bradford Terrace  
Philadelphia, PA 19149

Ms. Marjorie Aamodt  
RD #5  
Coatesville, PA 19320

1370 340



Cert. of Service  
Docket No. 50-289

Ivan W. Smith, Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Walter H. Jordan  
881 W. Outer Drive  
Oak Ridge, Tennessee 37830

Dr. Linda W. Little  
5000 Hermitage Drive  
Raleigh, North Carolina 27612

George F. Trowbridge, Esquire  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, N.W.  
Washington, D.C. 20036

John E. Minnich  
Chairman, Dauphin County Board  
of Commissioners  
Dauphin County Courthouse  
Front and Market Streets  
Harrisburg, Pennsylvania 17120

  
\_\_\_\_\_  
William S. Jordan, III

1370 341