

WASHINGTON STATE UNIVERSITY

PULLMAN, WASHINGTON 99164

DEPARTMENT OF SOCIOLOGY/DEPARTMENT OF RURAL SOCIOLOGY
Room 23, Wilson Hall

March 12, 1984

Ms. Annette Vietti
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Assessment of Social and Economic Impacts in Draft Environmental Statement Related to the Operation of WPPSS Nuclear Project #3, Docket 50-508, Washington Public Power Supply System.

Dear Ms. Vietti:

After several attempts, I have just received a copy of the Draft Environmental Statement (dEIS) noted above (NUREG-1033). Partly because the document itself does not make it entirely clear what day would be the actual deadline for receiving comments on the Draft EIS, and partly because an omission noted below is so serious that I am certain that your study team would want to consider it in the interest of producing an adequate impact statement (regardless of the actual date of the deadline), I am writing to call your attention to a serious problem/error in the draft statement.

Specifically, the abstract of the dEIS asserts without documentation that "the net socio-economic effects of the projects will be beneficial," and page 5-8, after a brief description of some economic considerations, notes that "the staff anticipates no other significant socio-economic impacts from station operation." These statements (particularly the latter one) demonstrate either an unacceptably low level of relevant expertise among the study team or else a refusal to consider relevant research findings on the social impacts of WNP-3.

The local social environment has changed greatly, and the social impacts of the licensing and operation of the plant are likely to be dramatically different from those that were envisioned in the original EIS on the construction permit phase of plant. An analysis by Rodney Baxter and myself has shown that attitudes toward local nuclear facilities have declined dramatically in nuclear "host communities" across the entire nation (Freudenburg and Baxter, 1983), for example, and even more pointedly, as noted in a report prepared by Robert L. Wisniewski and myself (copies of which were shared with the Washington Public Power Supply System), "there is greater local opposition to the WPPSS nuclear plants than to the nuclear facilities of any of the other "normal" host community in the history of surveys in the U.S." The level of opposition near the Satsop facility, in fact, is matched only by a survey done

8403200238 840312
PDR ADOCK 05000508
D PDR

C002
1/1

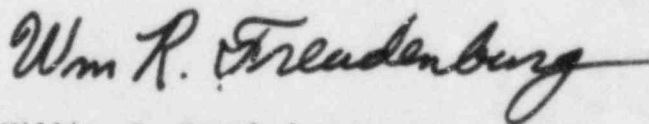
Ms. Annette Vietti
March 12, 1984
Page 2

at Three Mile Island itself, only four months after the infamous accident (Wisniewski and Freudenburg, 1981:38). These reports and others have noted further that the social consequences of permitting operation of a facility over such intense objections could be grave indeed.

I further call to your attention to the fact that the Regulations for Implementing Procedural Provisions of the National Environmental Policy Act make it explicit that "worst-case" assumptions should be utilized in situations such as these where the absence of an adequate quantitative data base makes it difficult to predict with any precision just what specific impacts are likely to occur. I also call to your attention the fact that, as noted in a forthcoming article in The Harvard Environmental Law Review, the recent Supreme Court decision in The Nuclear Regulatory Commission vs. People Against Nuclear Energy (PANE) would not be relevant here, since that case had to do with PANE's contention that an environmental impact statement was required even though no (non-psychological) physical environmental impacts were alleged. In the current case the Nuclear Regulatory Commission has clearly decided that an EIS is required, and is merely failing (in clear violation of the Council on Environmental Quality guidelines for EISs) to make best or even "token" use of the available scientific expertise on the likely social impacts of issuing an operating license for WNP-3.

If I may provide you with any assistance in responding to the substance of these comments and/or in identifying scientists with the relevant expertise for responding to the comments, please do not hesitate to contact me at the address on the letterhead above.

Sincerely,

A handwritten signature in cursive script that reads "Wm R. Freudenburg". The signature is written in dark ink and is positioned above the typed name and title.

William R. Freudenburg
Associate Professor

WRF:gm