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1359 Bradley Ave.

Hummelstown, Pa. 17036

8 Feb., 1981

Ivan W. Smith, Esquire
Chairman, Atomic Safety and Licensing Board
TMI-1 Restart Proceeding
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Smith:

This letter is precipitated by the news of recent days, but the intention to write goes back much farther than that. The concern, of course, is over the restart of any nuclear reactor at Three Mile Island at any power level--including the 5% foot-in-the-door level now suggested by the N.R.C. staff.

Though some, understandably, seem to have successfully suppressed the memory of the events following the March 28, 1979 accident, my memory, unfortunately, remains intact. After the emotional terror we lived through, I can't warm to the idea of a nuclear reactor at TMI ever reopening. But the suggestion to reopen Unit 1 before seeing to it that Unit 2 is safely cleaned up is unconscionable. Let's at the very least see to it that the first mess is cleaned before risking making another.

To this observer it appears that concern for the public's health and safety is now receiving less attention than the economic and pragmatic arguments. The "majority" 2 to 2 decision of the N.R.C. Commissioners to disregard emotional stress serves, I think, as an example. I understand that your Panel recommended against that decision. It's too bad that such concerns were not heeded.

Recently, the public has been relatively quiet on the TMI issue. This should not be interpreted to mean that there's been a resurgence of confidence in the operation and operators at TMI. Quite the contrary! The excruciatingly slow pace and extravagant price tag projected for the clean-up tend to leave doubts as to whether this unprecedented task can be safely accomplished. Unless and until it is accomplished, how can the reopening of TMI-1 even be considered?

We'd all like to put the accident at TMI behind us. But with the slowness and uncertainty of the clean-up at Unit 2, it's evident that it won't be over soon. I sincerely hope that your Panel will not decide to compound our worries and fears by approving the reopening of Unit 1--certainly not now--hopefully, not ever. And I'm sure you're aware that I don't stand alone in this view.

Thank you for listening.

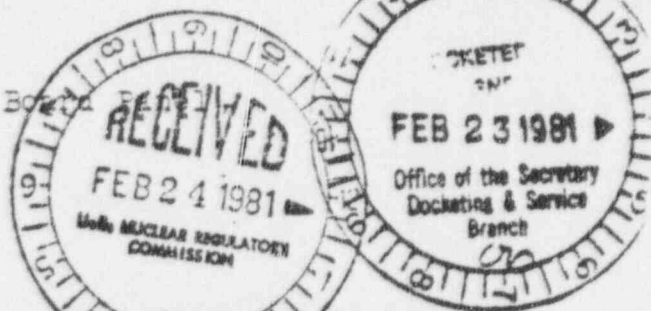
Sincerely,

Donald P. Lookingbill
Donald P. Lookingbill, M.D.

P.S. After this letter was drafted, an editorial appeared in the Sunday Patriot News with which I am in complete agreement. In case you missed it, copy is enclosed.

Also, please excuse the typing. It's been some time since I've personally typed a letter.

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Safety First

Fix Priorities on TMI Restart

IN ORDER to help accelerate the restart of the undamaged Unit 1 reactor at Three Mile Island, the staff of the Nuclear Regulatory Commission has raised the spectre of a power shortage crisis in the region serviced by the Pennsylvania-New Jersey-Maryland power grid. Last summer, during an extended heat wave, which sent electric usage soaring about 1,000 megawatts above anticipated peak demand, parts of the PJM area experienced voltage reductions, sometimes more dramatically described as "brownouts." While the unprecedented amount of power consumption did put a strain on the system, no one was seriously inconvenienced as a consequence.

Citing an analysis by the U.S. Department of Energy that an operating Unit 1 would "minimize the probability" of a recurrence of brownouts this summer, the NRC staff proposes that the commission authorize the restart of the reactor at a power level not to exceed five percent of its capacity. The consequences of an accident at this level of power, according to the NRC staff, "are sufficiently small" that its recommended changes to the unit for full power operation need not be implemented.

There are two curious aspects to the staff's proposal. One, it was made in response to a request for suggestions on how to expedite hearings before the Atomic Safety and Licensing Board on the restart of Unit 1. The staff doesn't explain how its proposal expedites the hearing process. Second, the DOE

analysis clearly was referring to the value of Unit 1 operating at full power, not the five percent power proposed by staff, the incremental value of which to the overall power supply picture is so insignificant as to hardly warrant the suggestion that it could be a factor in averting a power shortage.

By any yardstick, including the conservative yardstick used by utilities, the PJM Interconnection should have had ample reserve capacity to cope with last summer's unprecedented demand for electricity without resorting to voltage reductions. DOE notes that the brownouts occurred "even though a gross reserve margin of 7721 megawatts existed" at the time. Rather than rushing the restart of Unit 1, someone, perhaps the state Public Utility Commission, should question why so many generating units were unavailable for service at a time when it was reasonable to expect that power demand would be at a high, if not record, level.

Urgent or not, the need for an operating Unit 1 should be of only peripheral concern to the Atomic Safety and Licensing Board. The hearings have just begun to consider the management capability of Metropolitan Edison, and still have to examine the utility's financial capability and emergency planning. The paramount questions remain, as they have since the day of the accident, the safety of the plant, the competence of its operators and the protection of the public. These concerns should not and cannot be side-tracked for the real or imagined urgencies of the moment.