

CRITICAL MASS

ENERGY PROJECT

P.O. Box 1538, Washington, D.C. 20013 Phone: (202) 546-4790

August 29, 1980

John Ahearne, Chairman
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear John:

The Critical Mass Energy Project has just received a copy of NUREG 0683, NRC's Draft Programmatic Environmental Impact Statement related to the decontamination and disposal of radioactive materials resulting from the Three Mile Island Unit 2 accident. We note that it is a voluminous document, embodying 12 technical chapters.

CMEP also notes that NRC has allotted 45 days for public comment. While such a time frame may seem eminently reasonable to the agency, the proposed deadline is unrealistic for obtaining technically proficient, thorough and meaningful public comments.

We note that the consequences resulting from the untested decontamination and disposal process are relatively severe to the environment. It can cause significant public health and safety risks to the surrounding population. The time frame for the entire decontamination process is estimated to endure from 5 to 8 years. It is conceivable that the public risks related to the radioactive decontamination tasks could expose the residents, workers and transient populations to health-related dangers for a decade.

Given these consequences, the Critical Mass Energy Project hereby formally requests that the NRC extend its time frame for public comment to 120 days. This will enable financially strapped individuals and citizen groups to provide the NRC with thoughtful, constructive and substantive remarks.

To truncate the time frame will be to exclude the public from this process. After the most traumatic nuclear power accident in the industry's commercial history, and the resulting comments from the Kemeny and Rogovin panels on NRC indifference to public participation, it appears incumbent upon your office to open the doors to public comment, not to shut it forcefully as your 45-day deadline ensures.

In addition to the 120-day period, we would additionally request that at least three public meetings be convened on the subject: two in Harrisburg and one in Washington, D.C. Proper prior notification of the public should accompany the hearings.

Looking forward to your agency's reply,

Sincerely,

Richard P. Pollock
Richard P. Pollock,
director

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