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Community Relations
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PS
Mr. Peter ~~B~~ramford
Project Manager for Three Mile Island
US Nuclear Regulatory Commission
11555 Rockville Pike
Mailstop: O8B3
Rockville, MD 20852

PS
Dear Mr. ~~B~~ramford:

I am writing to express concerns over Exelon Corp.'s proposed relocation of the Joint Information Center (a.k.a media center) for the Three Mile Island Nuclear Station (TMI) from its present location in Susquehanna Township (just outside Harrisburg) to Coatesville in Chester County, Pa. I am a resident of one of the five TMI risk counties and TMI's retired post-accident communication manager. Resource Relations is my consulting practice in organizational communication.

Exelon Corp., TMI's present owner, takes emergency preparedness seriously. I recently visited its Coatesville facility and was impressed by the scale of the emergency response center there and the technology behind it. Yet, in terms of emergency communication, the Coatesville location is on the fringe of what would be a churning communication setting during an accident at TMI. When it comes to crisis communication, Exelon's regional approach to the operation of its three Pennsylvania nuclear plants may be appropriate for Limerick and Peach Bottom, which are closer to Coatesville, but it is inappropriate for Three Mile Island.

My concerns would arise in the context of a General Emergency at TMI. Short of a General Emergency, the plant likely could relate to the news media at its near-site media center at the TMI Training Building, across Rt. 441 from the plant. But it is highly unlikely that Exelon would be hosting the media there during a General Emergency.

Relocation of the TMI JIC is opposed by the mayors of Middletown Borough and the city of Harrisburg. To my recollection, those are the largest population centers in or abutting TMI's Emergency Planning Zone (EPZ). Professor Sharon M. Friedman, of Lehigh University, who was a consultant to the Kemeny Commission following the TMI-2 accident and is expert in risk communication, also has concerns about Coatesville's distance from TMI, Middletown and Harrisburg, Pennsylvania's capitol city.

As the attached graphic, provided by Professor Friedman, indicates, a risk communication network during a crisis, becomes, in her term, a "tangled web" of participants and factors. In the context of an accident at TMI, it would be far better for the utility and its spokespeople to be in the midst of those concerns than at Coatesville, 62 miles from the plant. TMI's present media center is only 12 miles away, just outside the EPZ.

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“I don’t want to have to drive to Coatesville to have a one-on-one chat,” Harrisburg’s Mayor Mr. Stephen R. Reed told me in a telephone conversation recently. “Emergencies never go smoothly without one-on-one direct access.” Middletown’s Mayor Robert Reid opposes moving the TMI JIC for much the same reasons.

Two factors that have been cited to me by Exelon and the Pennsylvania Emergency Management Agency (PEMA) in support of the proposed relocation are not included in their submissions to the NRC but need to be included in the NRC’s evaluation of the request:

1) Exelon would “webcast” Coatesville news conferences on the Internet, making them available to reporters and, indeed, members of the public via their computers. Webcasts, though, could be subject to interruption under an onslaught of “hits” during a TMI emergency. And the ability of reporters to ask questions from remote locations would be less than ideal. It would be difficult to separate media questions from those being submitted by members of the public and to respond to media questions in the context in which they were asked.

2) The premise behind PEMA’s endorsement of moving the TMI JIC to Coatesville, I was advised in a telephone conversation with Henry Tamanini, a member of PEMA’s staff, was that it reflects consensus among the five TMI risk counties, who want a local media outlet and seem satisfied that the TMI Training Building would fill that role. In reality, it is highly unlikely that Exelon would be hosting the news media across the highway from a plant in a General Emergency – with “actual or imminent substantial core damage or melting of reactor fuel with the potential for loss of containment integrity...”

Exelon apparently did not consult with the Harrisburg area news media before deciding to move the TMI JIC to Coatesville. Had it done so, it might have gained a sense that those media would be under staffing and other strains because of the distance to Coatesville. One Harrisburg radio news director expressed concerns to me about the distance to Coatesville and possible traffic tieups should TMI-area residents be evacuated (it’s Mayor Reed’s policy to evacuate the entire city of Harrisburg should an evacuation be ordered). He also wondered whether cellphone connections from Coatesville would be reliable during an emergency. A Harrisburg TV news director noted that, given the distance to Coatesville, her station would need to use its satellite, rather than microwave, truck and likely could not afford to remain constantly on the air from Coatesville because of the expense of satellite feeds.

In a meeting I had with two Exelon communication managers at Coatesville, one expressed the view that CNN would be the dominant factor in covering a TMI emergency. CNN would certainly be a major outlet worldwide, but the role of the Harrisburg news media, with their regular viewers, readers and listeners – the people who would be most directly affected – needs to be respected too. The Kemeny Commission found after the TMI-2 accident in 1979 that “local radio was the single most important source of information about the accident for the people of Dauphin, Lancaster and York counties.” (Report of “The Public’s Right to Information Task Force,” p. 290)

Interestingly, under today’s patterns of consolidated media ownership, eight radio stations owned by two media companies – Clear Channel and Cumulus – are located a mile or so from TMI’s Susquehanna township media center.

Exelon’s communication managers told me their aim during a TMI emergency would be “to provide the best and clearest amount of communication as quickly as we can.” That’s certainly admirable. But accessibility to the news media and empathy for the affected public would be important too. Those additional factors are noted in the publication “Communicating in a Crisis: Risk Communication

Mr. Peter Bramford -3

Guidelines for Public Officials," that was produced by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration in 2002 after the experience of 9/11. (pp. 56, 25)

During the TMI-2 accident in 1979, the news media were drawn to the plant, so much so that the NRC moved its media center to the basketball court in Middletown's Borough Hall. Karl Abraham, the NRC's Region 1 press officer at the time, advised the Commission's communication director "everybody on the East coast is driving or flying to the site...Do you want to try to explain why in this kind of an action...we don't have anybody there to answer questions of the news media?" (Kemeny "Right to Know," p. 74.) The concept of a Joint Information Center is intended to provide a central, coordinated point for the release of information during an emergency, and TMI's present Harrisburg media center is intended to meet that need. Moving it to Coatesville could open up a "second front" in an information setting that could prove self-defeating. In a General Emergency, it's better to be as relational as possible, not distant.

Thank you for your consideration of these concerns.

Yours sincerely,

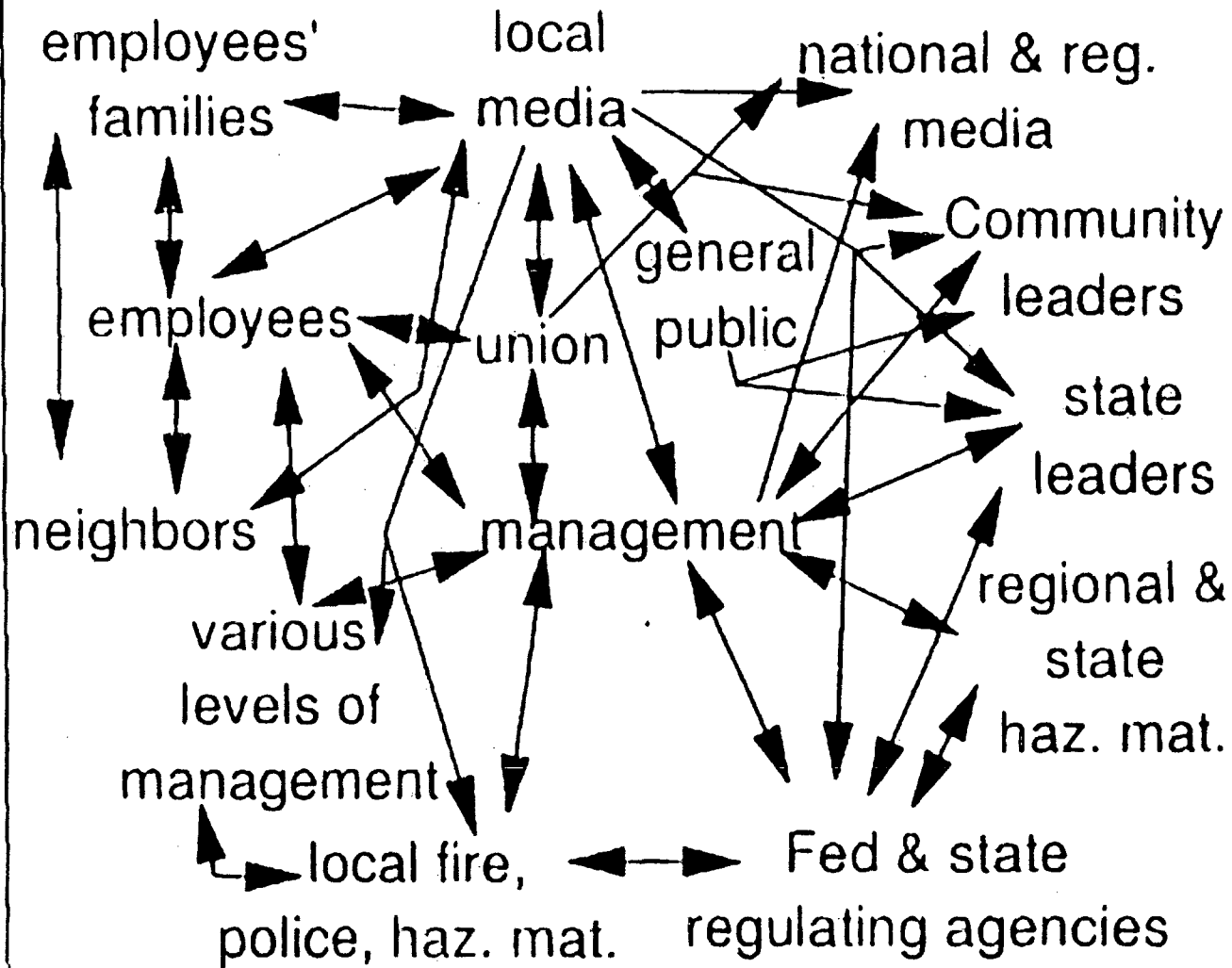

Douglas Bedell

Encl.: "Risk Communication Network" chart

CC:

Matthew Boyer, U.S. Rep. Tim Holden's Office	Bill Mead, WHP Radio
Ad Crable, Lancaster New Era	David Newhouse, Patriot-News
Ralph DeSantis, Exelon	Beth Rapczynski, Exelon
Dennis Fisher, WHTM-TV	The Hon. Stephen Reed, Harrisburg City
Sharon M. Friedman, Lehigh University	The Hon. Robert Reid, Middletown Borough
Peter Jackson, AP	Diane Screnci, NRC
Gary Lenton, Patriot-News	Henry Tamanini, PEMA
Caroline Imler, WHP-TV	

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