

EFMR Monitoring Group

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4100 Hillsdale Road • Harrisburg, PA 17112
(717) 541-1101 • FAX (717) 541-5487 • eepstein@igc.apc.org
1-888-624-8000

DOCKET NUMBER

PETITION RULE PRM 50-79
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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attention: Rulemakings and Adjudications Staff

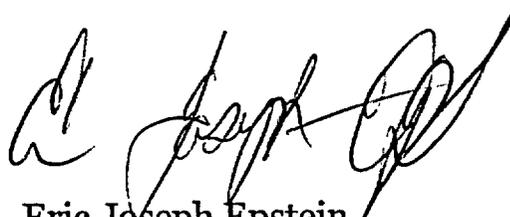
Subject: Petition for Rulemaking filed by Lawrence T. Christian
(Docket No. PRM-50-79)

Ms. Annette Vietta-Cook
Secretary
US Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Ms. Annette Vietta-Cook:

EFMR Monitoring strongly supports the petition filed to include nursery schools and day care centers in federally required Radiological Emergency Readiness Planning. I encourage adoption of these proposed rules.

Sincerely,



Eric Joseph Epstein
eepstein@igc.apc.org

Mr. Epstein is the Coordinator of the EFMR Monitoring group, a non-partisan community based organization that monitors Peach Bottom and Three Mile Island nuclear generating stations. <http://efmr.enviroweb.org/>

Enclosure

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History of EFMR Monitoring

The EFMR Monitoring Network is a nonprofit, nonpartisan organization which monitors Three Mile Island Unit 1 (TMI) and Peach Bottom Atomic Power Stations 2 & 3. The Group was formed out of a Settlement with GPU Nuclear in 1992 relating to Post-Defueling Monitored Storage at TMI-2. In January 1999, the new owners of TMI-1, AmerGen, (PECO Energy & British Energy) agreed to terms with EFMR through 2005. Additionally, EFMR expanded its monitoring and research activities to include Peach Bottom 2 & 3 as a result of Universal Settlement relating to the merger of PECO Energy with Commonwealth Edison.

EFMR has distributed 90 Rad Alert radiation monitors (rad alerts) at 50 stations in an eight county area around Three Mile Island and Peach Bottom, including numerous colleges, high schools and community-based organizations. Several additional monitors are deployed in northern Maryland close to the York County border. In addition, EFMR will deploy 30 rad alerts in close proximity to Peach Bottom as a result of its Agreement with PECO Energy.

EFMR has worked with AmerGen, Dickinson College, the Environmental Protection Agency, Los Alamos National Laboratories (SWOOPE Program), GPU Nuclear, the National Council on Radiation Protection and Measurements, the Nuclear Regulatory Commission, Peach Bottom REMP Program, PECO Energy, the Pennsylvania Bureau of Radiation Protection, the Pennsylvania State University, the Susquehanna Valley Alliance, Three Mile Island Alert, and the University of Tennessee.

EFMR maintained five low-volume air samplers on the east and west shores of the Susquehanna River opposite of TMI from 1993-1999. Dickinson College Physics Department collected the filters and cartridges of these monitors on a weekly basis. Analyses performed included, but were not limited to, weekly gross beta and alpha measurements, monthly gamma isotopic analysis, weekly Iodine-131 analysis, and semi-annual Strontium-90 analysis. The last collection occurred in December, 1999.

In November, 2000, EFMR deployed a low-volume air sampling station at Peach Bottom.

From 1993 through 1999, as part of the Agreement relating to TMI-2, GPU invested approximately \$900,000 in remote robotics research. PECO agreed to invest \$500,000 in robotics research over the term of its Agreement with EFMR.

PECO and AmerGen have agreed not to store spent fuel or radioactive waste from any other nuclear reactor at Peach Bottom or Three Mile Island during the terms of their Agreements with EFMR. PECO has also agreed not use Mixed Uranium Oxide (MOX) fuel at Peach Bottom 2 & 3, Limerick Nuclear, and Salem Nuclear Stations 1 & 2.

AmerGen has ensured that its work force meets or exceeds NRC staffing requirements and has agreed to pay excess decommissioning costs for TMI-1. AmerGen also agreed not to conduct business with any company, organization or nation that the United States of America is boycotting for economic or military reasons.

EFMR has on-line access to AmerGen's Reuter-Stokes, gamma monitoring system. This sensitive system collects samples, analyzes them, and prints out data on an hourly basis from 16 separate collecting stations located within a four mile radius of Three Mile Island. EFMR continues to attend NRC meetings, and receive regular briefings and updates from AmerGen, Exelon, and PECO Energy.

As part of a Negotiated Settlement with FirstEnergy (FE) (November, 2001), EFMR will receive correspondence and reports relating to TMI-2, including quarterly updates from the Remote Temperature Detector that was placed at the base of the reactor vessel as result of EFMR's Agreement with GPU Nuclear (1992).

FE has committed to maintain “corporate investment and involvement in the local community” at current levels for three years.

FirstEnergy will not store spent fuel from any FE plant at TMI-2 during the term of this Agreement. The Company will not trade TMI-2’s high-level radioactive waste rights to any other nuclear utility that would delay the decommissioning of TMI-2. In addition, in 2001, FirstEnergy, TMI-2’s new owners, agreed to provide a grant to EFMR enhance radiation monitoring around Three Mile Island.

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