

## Forward

On May 6, 1991 limited copies of a draft document titled "Nine Mile Point Nuclear Surveillance Program – A Summary" were mailed to the two utilities, Niagara Mohawk Power Corporation (NMPC) and New York Power Authority (NYPA) which operate three nuclear facilities at Nine Mile Point in upstate New York. Draft copies of the report were also sent to the Nuclear Regulatory Commission (NRC) and the New York State Department of Health (NYSDOH). Responses were requested by June 1, 1991. All four of the respondents forwarded comments by July 15, 1991.

A study of the radionuclide-monitoring program was initiated to determine whether unusual releases at nuclear facilities were reflected in the monitoring data. Specifically, this evaluation was initiated to assess whether the unusual release during the late 1970's related to the flooding of a Nine Mile 1 waste storage room, which resulted in the release of radionuclide, could be identified from the monitoring data contained in NYSDOH reports. The NYSDOH monitoring data were used because few hard copies of annual radiological monitoring reports from the utilities were available at the repository in Penfield Library at the State University of New York at Oswego during the time the report was written. Also, the annual radiological reports from the utilities, which were available at Penfield library, could not be take out for extensive review or analysis. Annual reports from the New York State Department of Environmental Conservation and from the NYDOH were available and obtained from the state of New York.

There were common themes in all four responses from NRC, NYSDOH, NMPC, and NYPA. All four respondents focused on the authors' unfamiliarity with radioecology and with the environmental radiological monitoring program. For example, it was stressed that the environmental surveillance program at the nuclear facilities at Nine Mile Point are not intended to monitor the environment but, rather to examine potential radionuclide pathways to humans. In addition, it was noted that regulation have been established for this program, and the utilities adhere to these standards. Second, the nuclear weapons testing during the 1970's and early 1980's were not referenced to in the report. Third, the use of radiological monitoring data that is below minimum detection limits calculated with known levels of radiological data to derive an assessment on the operations of nuclear facilities and their affect on the environment was criticized. The argument was that the actual radiological monitoring data is positively skewed. Fourth, the data from the NYSDOH is not intended to be an extensive radiological monitoring program but rather acts as quality check for the utilities' radiological monitoring data. Also criticized was the use of data from only the NYSDOH annual reports in assessing the radiological monitoring program at the Nine Mile Point area. It was stressed that monitoring data from the utilities should also have been incorporated in the report.

The NRC and the NYSDOH both acknowledged that is the responsibility of the utilities to conduct a radiological environmental program at a particular site regarding data and report accessibility. NYDOH remarked that it is up to the NRC to publish the data. The Nuclear Regulatory Commission did not address the issue of the public access of data.

Some of the critiques and comments from NRC, NYSDOH, NMPC and NYPA were incorporated into the report. These comments are highlighted in the report by noting the bold typed sentences followed by an abbreviation in parenthesis after the comment. Other comments, such as grammatical errors or misspelling noted by the reviewers were not highlighted.