

ENVIRONMENTAL COALITION ON NUCLEAR POWER

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Mr. J. Chalk ^{BUCKET NUMBER} ~~PROPOSED RULE~~ ⁽³⁴⁾ PR-140(44FR43128)

19 August 1979

Secretary of the Commission

US Nuclear Regulatory Commission 1280 260

Washington, D.C. 20555

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Sir:

In response to the NRC's notice of request for comment on whether or not the Three Mile Island Unit 2 accident commencing March 28, 1979, was an Extraordinary Nuclear Occurrence, I am submitting these brief comments in part on behalf of members of the Environmental Coalition on Nuclear Power.

Any declaration at this time that the Three Mile Island Unit 2 accident was not an Extraordinary Nuclear Occurrence (ENO) which, under Section 11j of Chapter 2 of the Atomic Energy Act of 1954, as amended, is a non-renewable decision would be premature and contrary to the public interest.

In addition to the questions raised by Dr. Chauncey Kepford of this organization concerning the applicability of the dose model in the Ad Hoc Population Dose Assessment Group's report (see his comments to the Commission on the ENO declaration), and his conclusions concerning dose calculations using the Licensee's models for assessing doses from releases resulting from Design Basis Accidents (see Kepford's submission in the NRC docket on Salem spent-fuel pool expansion proceedings, August, 1979, for the Lower Alloways Creek Township intervenors), we wish to point out the following reasons why it is inappropriate and contrary to the NRC's obligation under Chapter 1, Sections 1 and 2 of the Atomic Energy Act for the Commission to decide the issue now.

1. The accident which began March 28, 1979, is the

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in progress. Until the entire process of cleaning up and de-commissioning that severely contaminated reactor has been completed, there remains the possibility of further gaseous, liquid, or particulate releases that will add to the doses already experienced.

2. The doses beyond the 50-mile radius have been ignored.

3. According to June 21, 1979, testimony of Mr. A. Gibson before the Commissioners, stack monitors were offscale during the first days of the accident; hence the total doses received by the public have not been properly calculated.

4. No studies of spontaneous abortions, miscarriages, infant deaths, or early childhood mortality in the 50-mile radius have been completed by independent investigators. The pregnancies of the period have not come to term yet in many cases and especially the first trimester pregnancies.

5. No studies of death from respiratory ailments among the aged, from other radiation-related disease, or from synergistically-related deaths have been conducted among residents of the 50-mile radius to determine statistical departures from the expected deaths.

6. No independent studies have been completed of the experiences of the many individuals within a 20-mile radius of TMI-2 who observed symptoms of radiation sickness known to be associated with exposure to radiation - such as sore throat, nausea, diarrhea, skin disorders, burning eyes, fatigue, etc. Having been in the path of the plume on the morning of March 30, 1979, at Hershey, Pa., and having personally experienced these symptoms plus a persistent cough for more than one month following that probable exposure, I would submit that there were "clinically observable symptoms." With the likelihood of having to flee my home for days thereafter, however, I had no time to visit a clinic, or my doctor. In any case, an inhalation exposure

2. "would" presumably have not been detectable after the fact.
However, my personal experience gives credence in my mind
to similar symptoms which have been reported widely
among residents of the Susquehanna Valley. A full census
of all residents - and refugees - should be undertaken
before an ENO declaration. Chromosome damage is
detectable also as "clinically observable damage." Such
testing of all residents within a 20-mile to 50-mile
radius should precede an ENO decision.

The Commission or the Congress must define
a "radiation injury."

Most importantly, the accident is still in
progress.

Sincerely,
Judith D. Johnson
Co-Director

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