Before the
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of the Petition of

ANTI-NUCLEAR GROUP REPRESENTING YORK (ANGRY)
JOHN BOWERS, GAIL BRADFORD, Etc.

For An Order Requiring the Preparation Of An Environmental Impact Statement Prior To The Release Into The Atmosphere Of Radioactive Gases From The Three Mile Island Nuclear Generating Station

PETITION FOR RULEMAKING

PRM No.

---

1. On July 26 and 27, 1979, Newspapers serving the area in which petitioners reside published reports describing the presence within the containment structure of Unit Two of the Three Mile Island Nuclear Generating Station (TMI-2) of high concentrations of radioactive gases, and the eventual necessity of removal of such gases from the structure prior to entry of workers assigned to recovery operations.[1] The most plentiful radioactive isotope present in the gaseous mixture was reported to be Krypton-85, although other fission products, including xenon-133 and -135, strontium-90, and cesium-137 are also present. Mr. John Herbein, Vice-President of Metropolitan Edison Co. the owner of TMI-2 and licensee of this Commission, estimated the overall level of radioactivity represented by the gaseous mixture to be two million curies.[2] The aforementioned newspaper accounts stated that Met-Ed was considering two principal options for the removal of the gases: 1) ventilation into the atmosphere, and 2) pumping it into pressurized steel tanks of liquid hydrogen for disposal at an appropriate nuclear waste facility. Mr. Herbein stated that release into the atmosphere was considered by Metropolitan Edison to be the "less hazardous" of the two aforementioned methods of removal.[3]

---

1. "Krypton Gas May Be Vented At TMI Plant," York Daily Record, July 27, 1979, p.1.

2. Interview with John Herbein at TMI-2, August 3, 1979. On July 30, 1979, Petioner Bradford was erroneously informed by Mr. Karl Abraham, of this Commission's Region I office that the level of radioactivity in TMI-2 gases was 61,000 curies.

3. Ibid.

1885 354

7908210404

G

2. Petioners all reside within an eight to fifteen mile radius of the TMI-2 facility and therefore are directly affected by whatever action this Commission may take with respect to the disposal of TMI-2 gasseous fission products.

3. Krypton-85 is a noble gas radionuclide with a half-life of 10 years. It emits both gamma rays, which are known to pose serious health risks to human reproductive organs, and beta particles gravitating toward concentration in the lungs. In addition to the lung exposure, direct exposure would provide an external skin dose.[4]

4. This petition is brought pursuant to section 2.802 of this Commission's regulations (10 CFR § 2.802). It seeks a determination by this Commission pursuant to 10 CFR § 51.5(a) (10) that any action by it authorizing the release into the atmosphere of the radioactive gases presently contained within the TMI-2 facility would "significantly affect the quality of the human environment," and therefore requires the preparation of an Environmental Impact Statement prior to the taking thereof.

5. Release of said gases into the atmosphere poses a substantial risk that one or both of the following limitations on radiation exposure of persons in the immediately surrounding unrestricted areas will be exceeded:

1) Two millirems within any single hour (10 CFR 20.105(b)(1)
2) 100 millirems in any seven consecutive days (10 CFR 20.105 (b)(2).

6. A full Environmental Impact Statement is felt by petitioners to be necessary in order to assure adequate consideration of all environmentally relevant aspects of the gaseous releases Metropolitan Edison Co. appears to have decided to cause in the near future. Such a Statement could be expected <u>at minimum</u> to satisfy the standards of comprehensiveness and specificity set forth by this Commission at 10 CFR 20.106 (c), which <u>inter alia</u> calls for an assessment of the possibility of "reconcentrations of radionuclides" within the relevant period of radioactive decay (10 CFR 20.106 (c)(6)). Most importantly, a full EIS will insure full and complete consideration of all feasible alternative methods of disposal of the gases. (42 USC § 4332 (C)(iii).

---

4. Anna Gyorgy, NO NUKES, p. 84.

7. Notwithstanding this Commission's eventual action pursuant to this petition, Metropolitan Edison Co. should in no event be given authorization to make any further releases of radioactive materials into the atmosphere unless at least twelve hours before taking any such action it has issued a public announcement of its intent to do so.

DATED: York, Pennsylvania
August 9, 1979.

ANTI-NUCLEAR GROUP REPRESENTING YORK
(ANGRY)
245 West Philadelphia Street
York, Pa. 17404.

John Bowers

John Bowers,
Member, ANGRY Core Committee
RD7, Box 388A
York, Pa. 17402.

Gail Thelma Bradford

Gail Bradford
Member, ANGRY Core Committee
245 West Philadelphia Street
York, Pa. 17404.