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LOUIS N. PHIPPS, JR. DEPUTY SECRETARY

JAMES D. COULTER

The property response - me to In 1

DEPARTMENT OF NATURAL RESOURCES ENERGY & COASTAL ZONE ADMINISTRATION TAWES STATE OFFICE BUILDING ANNAPOLIS 21401

STATE OF MARYL AND

(301) 269 - 2261

September 4, 1979

Secretary of the Commission U.S. Nuclear Regulatory Comm. Washington, DC 20555

Attn: Docketing and Service Branch

RE: Environmental Assessment Use of EPICOR II at Three Mile Island. Unit 2 (NUREG-0591)

Dear Sir:

We have reviewed the subject document and offer the following comments and questions for your consideration.

Section 3.4 (Also Sections 5.2.1 and 5.2.2)

There is no consideration of the potential release of radioactivity to the aquatic environment due to the liver drops accident postulated in these sections. Although the liner contents are to be dewatered prior to removal from the chemical cleaning building, the drop accident could coincide with or be followed by rainfall. If this should occur, where does the runoff go and how much activity might go with it?

Section 3.5

It is not clear whether calculated doses from atmosphere releases are solely from the building ventilation system pathway or if they include the periodic free exchange of the chemical cleaning building atmosphere with the outside during the transfer of the demineralizer liners from the cleanup system to the trucks. If the "opened door" pathway is included, what fraction of the indicated doses are due to this pathway? If the "opened door" pathway is not included, what additional doses would occur by this pathway? Secretary of the Commission September 4, 1979 Page Two

Sections 1.0 (and others)

It is not stated in the document that there is sufficient tankage anywhere at TMI to store the entire 280,000 gallons of decontaminated water so that, if necessary, it could all be cleaned and held prior to discharge to the river. If sufficient tankage does not exist, then the decision to use EPICOR II should not be decoupled from the decision on the acceptability of the cleaned water for discharge to the river, unless EPICOR II can be stopped indefinitely in a condition where some, but not all the 280,000 gallons has been processed. However, the feasibility of stopping EPICOR II in this manner has not been addressed in this document, either.

One more general comment is also in order: numerical values in the proper physical units are much preferred to statements such as "less than 0.001 of the 10 CFR Part 20 limit" (p. 12, 1.16). The comparison to applicable limits can be made after the numerical value is given. This change would greatly enhance the readability of the document, both for the lay public and for those of us who read such documents with the thought of actually monitoring the effluents or dose rates.

Sincerely,

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Steven M. Long, Ph.D. Acting Director, Power Plant Siting Program

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