

# CRITICAL MASS

## ENERGY PROJECT

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August 22, 1979



Chairman Joseph M. Hendrie  
U.S. Nuclear Regulatory Commission  
1717 H Street, N.W.  
Washington, D.C. 20555

Dear Chairman Hendrie:

Public Citizen's Critical Mass Energy Project hereby petitions the U.S. Nuclear Regulatory Commission to convene open public hearings on the General Public Utilities proposal to "vent" radioactive gases into the environment from Three Mile Island Unit 2. The Project also requests that the decontamination method be approved by the Commissioners in open session, and not left to the NRC staff.

On the basis of information available to CMEP, the Project finds the proposed scheme of venting radioactive gases into the air to be an objectionable and unnecessary method for decontamination of TMI-2. According to the Bechtel Corporation consultant's report for the licensee, "controlled" venting of radioactive gases could lead to contamination levels for persons at the boundary site reaching .14 millirems of gamma radiation and 14.8 millirems of beta radiation during a 30-day period. NRC criteria sets the yearly maximum dosages for the general population at 10 millirem for gamma radiation and 20 millirem for beta counts. 10 CFR, Part 50, Appendix I(II) (B.1)7

Assuming that the Bechtel figures are accurate — a point still in contention — the licensee thus proposes to expose the surrounding population to nearly an entire year's beta contamination in a 30-day period. While such a maneuver is technically legal, CMEP finds the procedure fraught with unnecessary risk to the general public's health and safety.

Moreover, if there was an accident during venting, the TMI-2 area residents conceivably could receive much larger dosages than those contemplated by Bechtel and GPU. In light of the management history of Metropolitan Edison Company, TMI-2's licensee, and of its parent company, GPU, CMEP has little faith or confidence that the utility would be able to successfully carry out this plan without human error or component failure.

The general public deserves to be spared further risk of radiation contamination. The residents in central Pennsylvania have suffered real harm since March 28, and their daily routine will be further disrupted with renewed fears of still additional health risk.

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This risk is clearly unnecessary in light of the licensee's own admission that there are alternatives to venting of gas. Bechtel has described three alternate methods for the early stages of decontamination of the containment building where there is intense radiation. Condensation, low temperature cooling to liquify the radioactive gases and absorption have been cited by the licensee as potentially acceptable methods for reducing the level of radioactive gases -- especially Iodine 131 and Krypton 85 -- in the containment building.

What is particularly troubling is the fact that the licensee apparently prefers to release gases into the environment because it would require fewer workers to be utilized for this stage of decontamination. Thus the savings enjoyed in this venting scheme are for the Metropolitan Edison Company, not for the general public. It is unfortunate that at this late date Metropolitan Edison would propose a plan which puts financial savings above public health and safety considerations.

Prior to a final determination by the NRC staff, CMEP hereby petitions the Commissioners to hold public hearings on this matter in both central Pennsylvania and in Washington, D.C. All potentially affected or interested parties should have ample opportunity to comment on the decontamination proposals.

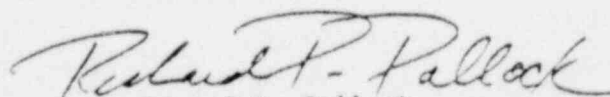
Given the stress and anxiety experienced by the residents of this area, and the general concern expressed by public sources that NRC will not thoroughly examine all the possible options in this issue, we also urge the Commissioners to approve the method for decontamination in an open session. This would certainly give greater assurance to the public that decisions of such import were not relegated to the staff on an ad-hoc basis, but was thoroughly investigated and weighed in a comprehensive manner by the Commissioners themselves.

The problems at TMI-2 are far from resolved. Accidents at the site could still cause considerable harm to surrounding communities. And a wary public is concerned that its health and safety is being sacrificed for cost-cutting considerations and regulatory expediency.

We therefore hope that your office and those of your fellow commissioners will adopt a policy encouraging openness and full public participation. All members of the public need to be assured that their health and safety concerns will be strongly -- and fairly -- weighed during the decisionmaking process.

An early reply to this request is greatly appreciated.

Sincerely,



Richard P. Pollock,  
Director  
Critical Mass Energy Project