Feb. 15, 1980
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Arnold, Md. 21012

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Dear Mr. Muller:

These are comments prepared for the 2/15/80 NRC Public Meeting in Catonsville, Md., at the UMBC Administration Bldg. Lecture Hall.

In case anyone here hasn't read the papers or seen any Baltimore TV news this past week, 2/10, I'd like to share these headlines :

TMI Reports "Minute" Leak of Radiation Into Atmosphere
TMI Officials Say New Leak Not A Hazard
New Leak at Penn. A Plant Termed No Public Danger
NRC Probes 3 Mile Leaks
Releases at Calvert Cliffs Go Unreported
NRC not Told Of 2 Leaks at Cliffs
Calvert Cliffs Leaks Probed

and, my favorite, a picture of TMI and the words Not Again.

All this after implementation of the NRC's TMI Lessons Learned Program. I'm here to speak about credibility, and scientific dispute, risks to workers, the psychological impact of the accident and evacuation, and continous low level leaks to the environment, and the plans to treat and discharge tritiated water to the Susquehanna.

Right here it needs to be said that the vast majority of people around the world who are familiar with the events at TMI know that Met Ed has made so many mistakes and miscalculations, and in general has run such a shoddy buisness, that it has lost any legitamate right it may have once had to operate a nuclear power plant. It's basic competence to run the clean up is highly questionable. The fact that the NRC has not revoked the license of TMI altogether is a reflection of how far out of touch the NRC is from reality. The President's Commission, and the NRC's study released in 1/80 agree that the NRC is incapable of filling the functions of regulation and protection of public health and safety it was created for. Indeed, the entire 3 Mile Island accident and it's aftermath are a reflection of the incompetence and inability of the NRC to promolgate effective rules and regulations for safe reactor operation in a way that can be measured and verified, and enforced. What we have here is a crisis in confidence of the most profound sort. Clearly, big changes are coming in the way the U.S. regulates it's nuclear industries. The only question really worth asking is whether these massive changes in the nuclear status quo will come before or after another accident like TMI or likely even worse. It is obvious that, at the rate the NRC is going another worse accident is inevitable before effective changes are made in the siting, licensing, and operation of these plants. Therefor, the contest is restructure the NRC toward some semblence of rational regulation that could reduce the odds of a catastrophic accident - before this accident occurs. That is why we are here tonight.

An example of the type of restructuring of NRC needed to prevent disaster, is the policy of licensing large power reactors near urban areas and ecologically sensitive areas like the Chesapeake Bay. NRC and AEC before it stated that the wisdom of this kind of siting policy is questionable, yet the policy continues.

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The NRC has stated that, at the time of the accident, it had rated all the nuclear power plants in terms of safety,maintenence, and good operating procedures, and TMI was just about in the middle of the list. This meansthere must be about 30 or so plants with a greater potential than TMI foe accidents, and short of imposing fines for non-compliance , the NRC considers this acceptable. This , too, is areflection of the trouble in the NRC.

The releases of gasses from TMI during the accident have been described as "harmless" and "inert". This supposedly means they don't combine with other elements that could find their way into people. However, a publication from the AEC, " Understanding the Atom" features a cover photomicrograph of zenon-tetraflouride - that is, radioactive zenon combined with flouride. Now, flouride is found in the environment in connection with coal - such as mining coal or burning it in a power plant. No mention has been made by the utility of this possible dangerous chemical combination.

In mid 1979, the report "Radioecological Assessment of the Wyle Nuclear Power Plant" was translated from the German by the NRC. Conducted by a highly respected group of scientists and enginerrs at the University of Heidleburg, the study was the first to research and challange assumptions and formulae and mathematical models wemployed by the AEC in the 1950's and 60's in the development of safe standards for radioactive emissions from power plants. These standards reflect prevailing theories of the possible bio-accumulation and other food chain effects of radionuclides loose in the environment. According to the Heidleburg scientists, the NRC - Aec stab dards are from 100 to 1,000 times off, and are particularly inaccurate in relation to susceptible individuals in the population. Further, it stated that dangerous levels of radionuclides from power plants could be expected to be found in many foods such as milk, venison, strawberries, grapes, wheat, soybeans etc. Briefly, the study suggests that the experiments by which current ideas of whats safe and what isn't are based on fradulant research.

The people of Harrisburg and Central Pennsylvania and the Susquehanna River Valley have been made to fear for their lives, the lives of their children, and and the integrity of their genetic material as a result of TMI . Can Met Ed claim no responsibility for cancers and lukemias caused by TMI that show up 10 to 30 years later? Remember that military men and others exposed to radiation in the 40's and 50's are just now banding together to find out if their exposure is related to later cancer, lukemia, and genetic defects. Where do Harrisburg residents that develop these disorders report for their compensation in 1999 ?

I also question the utility and NRC commitment to safety as evidenced by the occupational exposures workers are assigned. Have these workers and their supervisors been educated as to the probable effects of long term exposure to low level radiation ? When an accient occurs, how well informed are the people sent into the "hot area"? I believe that nothing approaching the fullest practicable use of robots abd other remote handling technologies has been attempted at TMI for one reason alone : expense. In he context of potential damage to future generations, this is reprehensible.

There is currently some controversy about the risks of tritium. I wish to remind the meeting tonight that the lack of environmental studies confirming tritium's harmfulness is in no way an indication that it is safe. The people of Maryland are totally and unalterably opposed to the dumping of any radioactive or tritium bearing materials into the Susquehanna and the Chesapeake Bay.

Daniel Burgess