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Docket No. 50-320

Ms. Alice A. Herman
R. D. #5
York, Pennsylvania 17402

Dear Ms. Herman:

Thank you for your letter of January 24, 1980, concerning the program for decontamination of TMI-2. Through letters such as yours, and through my attendance at several public meetings in the TMI area regarding the decontamination program, I can assure you that I have become very aware and sensitive to the concerns of the local populace.

The NRC staff is in the initial stages of preparation of an Environmental Impact Statement (EIS) covering all aspects of decontamination of the TMI-2 facility and disposal of the resulting wastes. During preparation of the EIS, the staff will carefully consider all reasonable alternatives for each step of the decontamination and disposal process, including treatment and/or disposition of the radioactive krypton in the reactor containment building and the water that has undergone decontamination treatment on site. These alternatives will be fully discussed in the EIS, along with an analysis of the advantages and disadvantages of each option. Accordingly, the EIS will serve both to inform the public of the overall impacts of the entire cleanup operation, and to provide the Nuclear Regulatory Commission with a thorough evaluation of the options available for each step of the process, so that they can make informed decisions regarding approval of plans proposed by the licensee. The primary consideration in any decision will be protection of the health and safety of the public.

There is no intent to release liquid wastes from the TMI-2 facility to the environment prior to issuance of the EIS. With respect to the radioactive krypton in the containment building, Met-Ed has requested permission to purge the gases in containment into the atmosphere under carefully controlled conditions. However, as stated by the NRC in their May 25 statement on the EPICOR-II environmental assessment, and reaffirmed in their policy statement on the programmatic EIS of November 21, any action of this kind will not be taken until it has undergone a thorough environmental review, with opportunity for public comment provided. Such a review may take the form of a special assessment such as was done for the EPICOR-II system operation, in addition to being included as a part of the overall evaluation in the EIS. In any case, alternatives will be fully discussed and considered and protection of the health and safety of the public will be a prime concern.

OFFICE ▶					
SURNAME ▶				8003100-012	
DATE ▶					

Ms. Alice A. Herman

- 2 -

FEB 27 1980

You will be furnished a copy of the draft EIS when it is issued, with the hope that you will provide us with any comments you may have on the steps involved in removal of radioactivity from the facility and ultimate disposition of this radioactivity.

Sincerely,

Original signed by
W. E. Kreger

Daniel R. Muller, Deputy Director
Division of Site Safety and
Environmental Analysis
Office of Nuclear Reactor Regulation

Enclosures:
NRC Policy Statements dtd
5/25/79 and 11/21/79

OFFICE	DSE:AADEP	TML Support	DSE (DDEP)		
SURNAME	WRegan	R. Pimer	DMuller		
DATE	2/22/80	2/26/80	2/27/80		

The staff is directed to prepare an Environmental Assessment regarding proposals to decontaminate and dispose of radioactively contaminated waste water from the Three Mile Island facility. The Assessment will be divided into several portions. The first portion of the Assessment will deal with the proposed decontamination of intermediate-level waste water using the EPICOR-II system at TMI. The Assessment should include discussion of potential risks to the public health and safety, including occupational exposures and the risk of accidental releases, and a discussion of alternatives to the EPICOR-II system. Pending completion of this portion of the Assessment and opportunity for public comment, the staff should direct the licensee not to operate the EPICOR-II system. Testing of the EPICOR-II system without using contaminated waste may proceed. Except for discharge of waste water decontaminated by the existing EPICOR-I decontamination system^{1/} and discharge of industrial waste water^{2/} as consistent with the facility operating licenses, no discharge of waste water shall be permitted until completion of a second portion of the Assessment dealing with any such proposed discharges. This portion shall include a discussion of alternatives to discharge into the Susquehanna River. The decontamination and disposal of high-level waste water will be the subject of a subsequent Assessment. However, the Director of the Office of Nuclear Reactor Regulation may authorize measures deemed necessary to cope with an

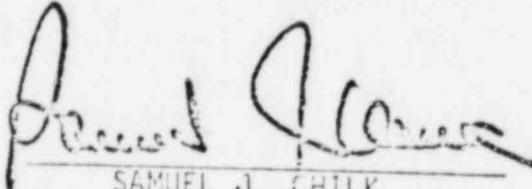
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- ^{1/} Primarily pre-accident waste water from Unit 1 which has been partially contaminated by water from Unit 2, with an activity level of less than 1 microcurie per cc. prior to treatment and with an activity level approximately 10^{-7} microcuries per cc. in the discharge canal after treatment.
- ^{2/} Waste water slightly contaminated (approximately 10^{-7} microcuries per cc.) due to leakage from secondary plant service support systems. The discharge of this industrial waste water is necessary to maintain TMI Unit 2 in a safe condition.

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emergency. If the Director of the Office of Nuclear Reactor Regulation believes the public health and safety requires the use of the EPICOR-II system, prior to completion of the first portion of the Assessment, he shall so report to the Commission and the Commission may then permit use of the system. The staff should inform the Commission promptly regarding its estimated schedule for completion of each portion of the Assessment and for completing the entire Assessment.

For the Commission



SAMUEL J. CHILK
Secretary of the Commission

Dated at Washington, DC,
this 25th day of May 1979.

Statement of Policy and Notice of Intent To Prepare a Programmatic Environmental Impact Statement

AGENCY: U.S. Nuclear Regulatory Commission.

ACTION: Statement of Policy.

SUMMARY: The Nuclear Regulatory Commission has decided to prepare a programmatic environmental impact statement on the decontamination and disposal of radioactive wastes resulting from the March 28, 1979 accident at Three Mile Island Unit 2. For some time the Commission's staff has been moving in this direction. In the Commission's judgment an overall study of the decontamination and disposal process will assist the Commission in carrying out its regulatory responsibilities under the Atomic Energy Act to protect the public health and safety as decontamination progresses. It will also be in keeping with the purposes of the National Environmental Policy Act to engage the public in the Commission's decision-making process, and to focus on environmental issues and alternatives before commitments to specific clean-up choices are made. Additionally, in light of the extraordinary nature of this action and the expressed interest of the President's Council on Environmental Quality in the TMI-2 clean-up, the Commission intends to co-ordinate its action with CEQ. In particular, before determining the scope of the programmatic environmental impact statement the Commission will consult with CEQ.

The Commission recognizes that there are still areas of uncertainty regarding the clean-up operation. For example, the precise condition of the reactor core is not known at this time and cannot be known until the containment has been entered and the reactor vessel has been opened. For this reason, it is unrealistic to expect that the programmatic impact statement will serve as a blueprint, detailing each and every step to be taken over the coming months and years with their likely impacts. That the planned programmatic statement inevitably will have gaps and will not be a complete guide for all future actions does not invalidate its usefulness as a planning tool. As more information becomes available it will be incorporated into the decision-making process, and where appropriate supplements to the programmatic environmental impact statement will be issued. As the decontamination of TMI-2 progresses the Commission will make any new information available to the public and to the extent necessary will also prepare separate environmental statements or assessments for individual portions of the overall clean-up effort.

The development of a programmatic impact statement will not preclude prompt Commission action when needed. The Commission does recognize, however, that as with its Epicor-II approval action, any action taken in the absence of an overall impact statement will lead to arguments that there has been an inadequate environmental analysis, even where the Commission's action itself is supported by an environmental assessment. As in settling upon the scope of the programmatic impact statement, CEQ can lend assistance here. For example should the Commission before completing its programmatic statement decide that it is in the best interest of the public health and safety to decontaminate the high level waste water now in the containment building, or to purge that building of its radioactive gases, the Commission will consider CEQ's advice as to the Commission's NEPA responsibilities. Moreover, as stated in the Commission's May 25 statement, any action of this kind will not be taken until it has undergone an environmental review, and furthermore with opportunity for public comment provided.

However, consistent with our May 25 Statement, we recognize that there may be emergency situations, not now foreseen, which should they occur would require rapid action. To the extent practicable the Commission will consult with CEQ in these situations as well.

With the help of the public's comments on our proposals we intend to assure, pursuant to NEPA and the Atomic Energy Act, that the clean-up of TMI-2 is done consistently with the public health and safety, and with awareness of the choices ahead. We are directing our staff to include in the programmatic environmental impact statement on the decontamination and disposal of TMI-2 wastes an overall description of the planned activities and a schedule for their completion along with a discussion of alternatives considered and the rationale for choices made. We are also directing our staff to keep us advised of their progress in these matters.

Dated at Washington, D.C. this 21st day of November 1979.

For the Commission,

Samuel J. Chilk,

Secretary of the Commission.

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