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February 18, 1980

Daniel R. Muller  
Acting Director  
Division of Site Safety and Environmental  
Analysis  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Muller:

This will set forth in writing the short comments I made at the Baltimore meeting on the TMI Environmental Impact Statement outline on February 15, 1980.

I expressed my opinion that such a Statement presents the framework for and the justification of important decisions for the necessary clean-up at TMI Unit 2, with a considered minimum effect on the environment. Since a work plan will be the final output of this effort, it is important for the Statement to examine the various parameters of that effort.

Upon examination of the outline dated January 10, 1980 enclosed with the February 1, 1980 letter, I am concerned that there does not appear to be sufficient examination of the following important factors:

Responsibility and Authority - of NRC, of the utility

Limits of Responsibility and Authority - Under conforming (regular) efforts.  
Under emergency (unpredicted) efforts.

Methods of Measurement and monitoring of those measurements (of all site effluents moving off-site)

Job control, Supervision, back-up

Specification of training and skills of key people, of other technical people

Identification of key people and incumbents (for both NRC & Utility)

I would be most happy to discuss this further with your. I am after a Statement which has some predictable enablement, not simply one which chooses among alternatives for specific reasons.

Very truly yours,

*Harry Kriemelmeyer*  
Harry Kriemelmeyer

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cc: Dr. S. Long

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TENTATIVE OUTLINE FOR TMI-2 PROGRAMMATIC EIS

JAN 10 1980

SUMMARY

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*Responsibilities  
Utility  
NRC  
Authority -  
Emergency v.  
Regulation*

*Measurements,  
Monitoring,  
Supervision, Backup,  
Control*

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4.2.4 EFFLUENTS AND RELEASES TO THE ENVIRONMENT

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