



Regional Planning Council

2225 North Charles Street Baltimore, Maryland 21218 (301) 383-5838

Milton H. Miller, Chairman C. Bowie Rose, Sr., Vice Chairman Walter J. Kowalczyk, Jr. Executive Director

February 27, 1980

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

Dear Mr. Muller:

The Regional Planning Council has reviewed the outline of the Draft Environmental Impact Statement for Decontamination of Three Mile Island, Unit 2. In addition, staff attended the February 15 public meeting in Baltimore County. Based on the information from these two sources, we have identified a number of issues and concerns that should be considered in the EIS.

1. The EIS should clearly identify how the cleanup operations will be monitored and what agencies will be responsible for the monitoring and recording of cumulative doses to the population. This should include identification of responsibilities of state and federal agencies and the utility to monitor each stage of the decontamination program.
2. There should be identification of interstate agreements between Maryland, Pennsylvania, and the NRC to exchange information, assure cooperation in monitoring across state lines, and monitoring of the Susquehanna downstream of Three Mile Island.
3. The level of radioactive releases and discharges acceptable to the NRC and the affected states should be stated.
4. The EIS should discuss the availability of high and low level nuclear waste disposal sites for Three Mile Island contaminated material. Arrangements for transport of these wastes offsite should be made with necessary local and state agencies to prevent delays and unplanned detours.
5. Any addition to any public agency of an impartial, independent, non-governmental research team of nuclear experts should be permitted access to the site to make random tests and monitor the effectiveness of the Epicore II process in its attempt to decontaminate low level radioactive water at Three Mile Island.

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6. Within the scope of the EIS, the NRC should specifically address the following:
 - a. the problem of Tritium's resistance to the Epicore II decontamination process;
 - b. Tritium's cumulative effect or impact on water ecology over an extended period of time; and
 - c. how the cumulative quantity of tritium may possibly exceed acceptable levels of radioactive material released to the Susquehanna River.
7. The Regional Planning Council should emphasize that a portion of the EIS refer specifically to the cleanup processes involved in decontaminating high level radioactive water at Three Mile Island.
8. Emphasis should also be made that the EIS evaluate the effectiveness of the proposed submerged demineralizer process against other capable alternatives, i.e., evaporation methods to neutralize high level radioactive water.
9. Finally, it is suggested that the NRC consider inviting a representative from Maryland to participate in the advisory committee of Pennsylvania citizens on Three Mile Island.

We look forward to assisting the NRC in whatever way we can to prepare the EIS and to review the draft.

Sincerely yours,


Walter J. Kowalczyk, Jr.
Executive Director

cc: Walter Orlinsky
Ms. Barbara Risacher
Bowie Rose, Sr.
John Seyffert
Steven M. Long