



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

*Duplicate copy for
microfiche*

8004290188

APR 17 1980

Dr. D. J. Bross
Director of Biostatistics
Roswell Park Memorial Institute
666 Elm Street
Buffalo, NY 14263


IN RESPONSE REFER
TO FOIA-80-198

Dear Dr. Bross:

This is in response to your letter of March 31, 1980, in which you requested, pursuant to the Freedom of Information Act, a report of the inventory of radioactive wastes in the TMI containment with the damaged reactor and the disposition planned for each of the inventory.

The enclosed documents, listed in Appendix A, have been found to be subject to your request.

Sincerely,


J. M. Felton, Director
Division of Rules & Records
Office of Administration

Enclosures: As stated

Appendix A

1. April 1979 Origen Run for TMI Unit 2.
2. August 14, 1979 Environmental Assessment, Use of Epicor-II at Three Mile Island, Unit 2 (NUREG-0591).
3. December 12, 1979 Summary, Technical Plan for TMI-2 Decontamination and Defueling, Metropolitan Edison Company.
4. March 1980 NUREG-0662.
5. March 1980 NUREG-0662, Addendum 1
5. April 1980 NUREG-0662, Addendum 2.

Irwin D.J. Bross, Ph.D.
Director of Biostatistics
Roswell Park Memorial Institute
666 Elm Street
Buffalo, N.Y. 14263

No opinions here expressed should be construed as reflecting official positions of the administration of
Roswell Park Memorial Institute or of the N.Y. State Health Department.

March 31, 1980

Richard H. Vollmer, Director
Three Mile Island Support
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-80-198
rec'd 4-9-80

Dear Dr. Vollmer:

In your letter to me of January 18, 1980, you enclosed a "Statement of Policy and Notice of Intent to Prepare a Programmatic Environmental Impact Statement (November 21, 1979)". Since then the date for a final decision on the dumping of radioactive gases and liquids has been set for April 8, 1980, but I have not received the promised PEIS. Therefore this letter has three purposes:

(1) As a letter to go into the public record opposing any dumping of radioactive materials at Three Mile Island. It makes no engineering or public health sense to dump Krypton as the first step when the later steps in the "clean-up" have not been specified programatically.

(2) As a request under the Freedom of Information Act for full report of the inventory of radioactive wastes in the TMI containment with the damaged reactor (either as part of any competent PEIS or as information from NRC files). In addition, since virtually all of this radioactivity would have to be removed from the containment if the current (5 rem per year) NRC exposure standards for workers would ever be met, the specific disposition planned for each item of the inventory should be given (e.g., vented into atmosphere, discharged into river, removed by truck, etc.). This information is clearly essential for any valid Environmental Impact Statement so it should be readily available.

(3) As a letter protesting the NRC violation of intent and letter of the laws concerning public participation in the decision-making process. The information needed for an informed public response and the time required to develop an alternative Environmental Impact Statement has not been forthcoming. This is clearly a decision which should not be made without extreme careful consideration or without full information and the decision set for April 8, 1980 should be postponed until these conditions are met (at least 90 days).

D019
ES/10

8004040320

In support of the above purposes, the following main points will be made without extensive back-up, the back-up being available if NRC holds additional hearings:

(1) It is inexcusable to release any radioactivity into the environment until the final disposition of the TMI containment with the damaged reactor is decided. If a major option, entombment, is the final disposition, no release of radioactivity would be required.

(2) The refusal of NRC to consider entombment involves an unreasonable application of NRC regulations to a situation (e.g., the TMI accident) that was not originally anticipated. Eventually, compliance with the regulations will eventually be recognized as an engineering impossibility. The current 5 rem per year NRC standards for exposure of workers cannot be achieved with the present state of the art in decontamination.

(3) Since over 99.999% of the 100 rem per hour reported by TMI sensors would have to be removed, since transport of radioactive gas and liquid by truck is infeasible, and since the only alternative is dumping the radioactivity in the environment, the entire inventory and not just the Krypton gas must be considered. Each dumping is irreversible. However, no dumping would make sense unless the entire inventory of radioactive materials is removed. This inventory has not been fully reported. It may not even be known to the NRC since there is limited and only indirect information on the conditions inside the containment. Nevertheless it would be folly to proceed without some overall inventory estimates since this is required to meaningfully evaluate environmental impact.

(4) On the basis of sketchy evidence so far released it is possible to make only rough ("ballpark") estimates of the overall effect of the dumping of the TMI radioactivity. However, the exposure to this radiation (even if released in conformity with NRC standards--a smaller dose over an extended period) is probably going to produce some 5000 radiation casualties in the population downwind or downstream from TMI. The casualties would range from serious (but invisible) genetic damage to deaths from leukemia or other cancers after 10 or 20 or 30 year latent periods. The population undergoing this serious risk will have little or no prospect of compensation.

(5) The net effect is that the NRC is prepared to authorize what amounts to a rerun of the disastrous decisions made by other federal agencies in conjunction with the weapons tests at Big Smoky and elsewhere. The difference is that the reported 970 millirem (average) exposures at Big Smoky are now known to double the risk of leukemia and to have a wide range of other adverse health effects among the servicemen who were exposed. Since dosages in the one rem range (100 millirem to 10 rem) are possible from the dumping, the claim that these exposures are "harmless" is now known to be scientifically false.

Richard H. Vollmer, Director

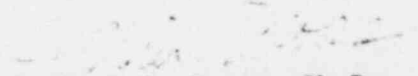
March 31, 1980

Page 3

(6) Under these circumstances, all Americans who live in the general vicinity of TMI have good reason to believe that their health and safety will be endangered by any dumping of the radioactivity at TMI into the environment. They have good reason to be alarmed, enraged, and to take action in defense of their lives and the lives of their children. A decision to go ahead with the dumping would constitute reckless endangerment of the health of thousands of Americans and probably criminally negligent homicide as well. Whatever happens from here on will be on the head of the Nuclear Regulatory Commission and of President Jimmy Carter.

The above points support the three stated purposes of the letter. The purpose of the Freedom of Information request is to enable more accurate and precise calculations of the actual environmental impact of the dumping of radioactive materials. I hope the NRC will comply.

Very sincerely yours,


Irwin D.J. Bross, Ph.D.
Director of Biostatistics

IDJB/mak
CC: Open