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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 12, 1980

William J. Dircks  
Acting Executive Director  
for Operations  
Nuclear Regulatory Commission  
Washington, D.C. 20555

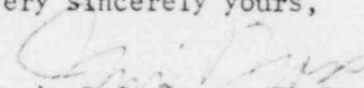
Dear Mr. Dircks:

According to the February 19, 1980 press release, there is now a special NRC task force to study clean-up operations at Three Mile Island (TMI). It is supposed to insure that the "health and safety of the public is being protected". The composition of the committee does not appear to include individuals with general public health experience. If the committee gets its information on radiation hazards from official sources, this will endanger the public health and safety.

By way of illustration of this point, I enclose my letter to President Carter on the planned release of the radioactive gases at TMI. Our recent studies show that the proposed schedule will maximize the genetic damage to the persons in the vicinity of TMI instead of minimizing it. The efficiency per rad in producing leukemia is higher at fractionated doses than in single doses. Moreover, the proposed release is entirely unnecessary if the cleanup is approached realistically (and not with a grim NRC determination to go by a book that should be rewritten for TMI).

It is my opinion that the NRC task force with this assigned mission is legally responsible for a y malpractice which unnecessarily exposes the public to radiation hazards. The Pinto trial may not be a precedent, but it is likely that in the future both corporate and federal officials may be charged with negligent homicide or reckless endangerment, or other crimes and misdemeanors (especially when they have been clearly informed of the danger of the course of action that they authorize). You are now on notice that any dumping of TMI wastes (gases, liquid, or solid) is dangerous and unnecessary.

Very sincerely yours,

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

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Dear

A few months ago, the American public breathed a sigh of relief--the danger from the Three Mile Accident was over. This now seems to have been premature. An August 14, 1979 news story from AP (copy enclosed) suggests that mismanagement by General Public Utilities may result in far greater hazards from the nuclear waste disposal than from the original accident.

The situation is as follows:

1. The plant was damaged beyond repair but GPU is determined to cover up this fact.
2. The only technology now available for disposal of this plant that will permit adequate protection of the public and the workers is entombment. My letter to Dr. Kemeny on this point is enclosed.
3. Any other technology would require disposal of the radioactive wastes by venting into air, dumping into the river, or transport of large amounts of such material by truck or other means. Any or all of these will expose workers and the public to dosages of radioactivity which will result in far more deaths and disabilities than the original accident.
4. Testimony in New Jersey involving inclusion of entombment costs in the current utility rates illustrates that even if a nuclear power plant is shut down when it is intact and functioning, there is at present no better technology for disposal available than entombment. The Bechtel report involves "paper" technology, methods that have never been previously used or tested or applied on the large-scale operations required here. Clean up of the present shambles is clearly a job which is several orders of magnitude more difficult than clean up of an intact installation. The Bechtel report is the same kind of technical-sounding claptrap that the DOE subcontractors produced on the West Valley clean up. (See enclosed note on lying with Mickey Mouse arithmetic).

5. I suspect that the purpose of this scheme is to stall action indefinitely by exploiting the almost automatic environmentalist reaction. What with environmental impact statements, the litigation could go on for years. It could take 5 years before it is finally admitted that the installation will have to be entombed. In the meantime with the decision in limbo, the Three Mile Island installation would continue as a passive threat to the public health and safety. If there were dumping, it will be an active threat.

6. In view of the continuing and deliberate mismanagement by General Public Utilities, it is essential that the Presidential Commission, or Congress, or both, consider the nuclear waste disposal problem that resulted from the Three Mile Island accident as well as the accident itself. I believe that the federal and state agencies should advise GPU to start to develop plans for entombment as an alternative to the Bechtel report. The decision-making on waste disposal should be taken away from GPU since the utility is completely unqualified for this task.

A critical factor in all this (although it is not so evident) is the new research on the health hazards of low-level ionizing radiation that shows that the NRC permissible levels are in fact dangerous levels. The 5 rem dose to workers permitted each year is probably more than a doubling dose for leukemia and genetic damage and other health problems. Thus, even if the clean-up is in compliance with present standards, the exposures during the clean-up and after its theoretical completion would produce heavy mortality and morbidity among the workers. It would also endanger the general population down-wind or down-stream from the dumping or on the routes used in transport of radioactive materials.

Despite the apparent technological complications the situation here is as simple as 1,2,3. One, there is (according to recent measurements) enough radioactivity loose at this site to kill a lot of people. Two, with entombment the radioactivity stays on site. Three, with any other plan the radioactivity has to be dumped somewhere and any attempt to do this can kill both workers and the public. Clearly, no dumping whatever should be allowed until there is a final decision on disposal since there can be no excuse for unnecessarily jeopardizing human health and safety.

Very sincerely yours,

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

IDJB/mak

Attachments: (1) AP News Story (8/14/79)  
(2) Letter to Dr. John Kemeny (07/30/79)  
(3) "How to Lie With Mathematics"