

EA 423

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ENVIRONMENTAL COALITION ON NUCLEAR POWER

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Dear Sir or Madam:

Below are my comments on NUREG-0662, the Environmental Assessment for the Decontamination of the Three Mile Island Unit 2 Reactor Building Atmosphere," which I abbreviate as EA.

With the release of this EA and the unnecessarily short 15 day public comment period, the NRC Staff continues its policy of mismanagement by crisis which has become so typical throughout the continuing TMI-2 accident. The Staff continues to invent crises so as to force the implementation of the "action" or "fix" that is ready to be implemented or in place and which has already been decided upon by the NRC Staff and the suspended licensee. This policy of action by crisis was used to force the use of Epicor II in late 1979, and is used again in this EA. The result of this is that because of the invented crisis, public debate and comment is severely limited.

This failure of the Staff to deal in an honest and forthright method with the public began much earlier in the course of the TMI-2 accident. One unfortunate example is the silly and meaningless method used by the NRC public relations office in King of Prussia, Pa. This office, throughout the month of April was unable (or refused) to offer useable or interpretable data concerning the ongoing releases of radioactive gases (mainly, iodine-131). What the office did report was vent exhaust gas concentrations, with no mention whatsoever of the vent exhaust rate or total quantities of radioactive gases on an hourly or daily basis. This policy was also carried out through the issuance by the NRC of the various PNO bulletins throughout the early course of the accident.<sup>1</sup>

<sup>1</sup>See, for instance, PNO-79-67X, page 2. Here are listed a number of iodine-131 concentrations in the ventilation stack. With no further information, these numbers are meaningless and useless, since there is no specification of the volume of gas released during the specified time periods.

In an attempt to get accurate, timely, and useable information among other things concerning the TMI-2 accident, I filed an emergency petition in accordance with the Commission's rules (10 CFR 2.202(a)(1) and 2.206(a)) on April 27, 1979, and supplemented on May 16, 1979. These requests asked for a public hearing before any change in plant status or plant technical specifications, or before the "modifications of equipment, processes or structures at TMI-2." (May 16, 1979, Supplement, p. 9). Not only was this request ignored in its entirety, the meager flow of accident-related information that had been coming to the lawful intervenors in the incomplete TMI-2 licensing process soon dried up. Despite involvement in the TMI-2 proceeding since 1974, and despite the specific requests (above) for information and public hearings, the initial receipt of the Epicor II EA arrived only after Epicor II had been designed, purchased, and constructed, and after public comment had been received, on October 20, 1979. Of course, at that time, an offer of hearings was made by the NRC, but only after the fact, and only after all other alternatives had been precluded, and all public comments were rendered useless.

Now, a year after the accident began, there is a new emergency. Suddenly, the krypton-85 remaining in the containment building must be vented, and the only way just turns out to be exactly what the suspended licensee and the NRC Staff have already agreed upon. Here again, a crisis has been created so as to preclude meaningful public comment and a thorough evaluation of alternatives. There does not appear to be any reason whatsoever why this subject of krypton disposal could not have been approached on a rational, deliberate timetable. Instead, the Staff stalled and seemed to ignore the problem of equipment failure inside the TMI-2 containment structure until the spectre of imminent failure could be used to create a crisis to force an otherwise unacceptable krypton disposal option.

So here we are again. A new crisis has been found, and a new, forced option has been chosen quietly by the Staff and the suspended licensee to again preclude meaningful public involvement and meaningful discussions of alternatives.

The options suggested in the EA are sufficiently rigid and poorly thought out that little choice is offered among them. For instance, the reactor building purge option (to take place slowly, over the period of two months) obviously releases the krypton to the atmosphere, but at the site of the accident. It is inconceivable that this option would not add

greatly to the mental stress and anguish already suffered by the residents of central Pennsylvania. Yet the other systems of krypton removal (charcoal absorption, gas compression, cryogenic processing, and selective absorption) all assume that the krypton is to be contained somewhere until it all decays (the half-life is about 10 years). This rigid assumption allows the Staff to raise the spectre of accidents in the storage of the gas. The Staff does not seem to view as a workable alternative the collection of the gas, the removal from the site to some unpopulated place, like the Atlantic Ocean, the Pacific Ocean, the Antarctic, or the Arctic, and the release of the krypton there under specified conditions. Such an option would go a long way toward restoring public confidence in the NRC.

There are at least two other alternatives which have not been evaluated by the NRC Staff. I can only speculate as to the reasons for these omissions.

First, if imminent failure of equipment in TMI-2 is indeed a real problem, the gas could simply be transferred to the containment structure of TMI-1, which will not be operable for months or years if ever, anyway. Then, the needed maintenance could take place at TMI-2 without the need to subject the already traumatized residents of central Pennsylvania to further mental torture and involuntary radiation exposure. Of course, once in the TMI-1 containment, one of the other disposal options could be implemented at an orderly pace.

Secondly, the containment structure could be vented rapidly, as in a "puff" release. This should take place in an orderly fashion, on a day with predetermined meteorological conditions (as steady winds and full sunlight to enhance upward mixing). Such a plan could be announced well in advance, with the actual release to take place, for instance, on the first Saturday or Sunday which meets the meteorological criteria. The advantages of this plan are listed below:

- 1) It is quick, and the public can be reassured that the gaseous release problem is over with.
- 2) Those members of the public who choose not to be exposed to radiation for which they get no benefit and those who simply want no further involuntary radiation exposure for themselves and their children (and the unborn) can simply leave the area to be affected for the day. Costs would be minimal, as would be the total population exposure.


- 3) The NRC and the suspended licensee could break with their past practices and demonstrate a modicum of concern for the feelings of the public.
- 4) People all over the world would for the very first time learn how many members of the affected public would take

protective actions appropriate to reduce or avoid exposure to radiation or to radioactive materials. (10 CFR 140.85(b)(4)).

The only disadvantage that I can conceive of to the "puff" option would be that the nuclear industry and its unquestioning promoters in government, including the NRC itself, would also find out how many people don't want to be exposed to any more radiation from TMI-2. Such knowledge would undermine the myth of public acceptance of unnecessary radiation exposure and would look bad on the record of future reactor licensing proceedings.

For each of the "less preferred" options in the EA, the Staff discusses the time required to implement the option. In none of these discussions does the Staff acknowledge that many months have already been wasted by the inaction (or inattention) of the Staff and the suspended licensee to the krypton problem. The public must not be held hostage and again used as guinea pigs in the continuing TMI-2 accident as a result of the incompetence of the NRC Staff and the suspended licensee.

The "preferred option," that of slow venting into the atmosphere requires the public to continue to trust and rely on both the NRC Staff and the suspended licensee. The TMI-2 accident has amply demonstrated that neither is worthy of trust.

  
Chauncey Kepford