

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

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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.

April 25, 1980

Harold R. Denton, Director
Office of Nuclear Reactor
Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Denton:

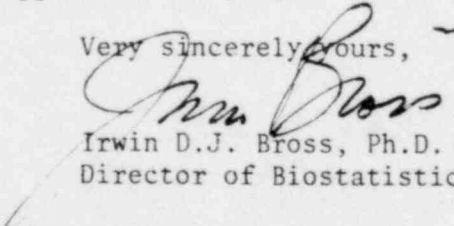
Thank you for your letter of April 18, 1980. The stress on going full speed ahead with the purging of TMI-2 does nothing to put to rest my concerns. To say in response to the proposal for entombment that this is "not a viable alternative to its disposal since some uncontrolled release is likely to occur in the future" is really baffling. If the radioactivity is immobilized in concrete where will the uncontrolled releases be coming from?

Clearly the NRC is dealing with symbols, not reality, in a situation where mistakes are going to kill people. The purging is a symbolic reaction to show the "damn the torpedos, full speed ahead" spirit. Your own data make it clear that exposures to workers in the containment will quickly exceed NRC limits whether the Kr-85 is purged or not. It shows that most of the radiation is not coming from the gas phase.

The data of the Pennsylvania State Health Department, properly analyzed (as in my letter to Nature) shows almost a doubling of the infant mortality rate after the accident. If NRC had any interest in protecting the public health and safety in a real (as opposed to a symbolic) sense, this would be a deterrent against additional Kr-85 exposures to the general population. While we may not be certain that the additional 14 dead babies in the 1979 period of the study are due to the low-level radiation, we also cannot be certain that they are not.

"Full speed ahead" is not a sign of courage or determination, it is a sign that NRC is far more concerned about obeying signals from the White House than in what happens to the people living around TMI-2.

Very sincerely yours,


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

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