

The Conservation Law Foundation of Rhode Island

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S. Arlene Violet,
Counsel

August 29, 1979

Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

These comments are in protest to a ruling by the NRC issued on August 3, 1979, which concluded that the accident at Three Mile Island is not to be considered "extraordinary". The rationale offered for this decision is that no person offsite received over 20 REMs of radiation.

Such reasoning ignores the fact that the accident was serious, and actually not ordinary, by arbitrarily defining that a 'serious' nuclear plant accident must affect persons or property offsite.

The ruling implies that a nuclear plant need have little consideration for the health of its workers. This is relieving the employer of responsibilities towards its workers to safeguard their health and well-being in the workplace, in direct opposition to the goals and spirit of recent Occupational Safety and Health Administration rules and regulations.

The decision also ignores the possible long-term hazardous effects on workers of continuous exposure to small leaks of radiation, or on people offsite, in amounts of under 20 REMs. Criteria such as immediate deaths or property damage (resulting from an accident) is an outdated indicator, as exposure to radiation takes its toll over 20 or 30 year spans, not immediately.

In sum, we protest the August 3 decision by the NRC, as it represents a step backward in ensuring the health and safety of both workers and the general public from the potential hazards of radiation exposure.

Sincerely,

Joanne Riccitelli

Joanne Riccitelli
CLF/RI staff

JR/sw

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