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Mr. Robert Hager  
Christic Institute  
A Religious Public Policy Center  
1324 North Capitol Street  
Washington, D.C. 20002

Dear Mr. Hager:

The information provided as an attachment to your letter of June 16, 1980 has been evaluated by members of the NRC staff. I have enclosed the results of our evaluation for your information. Additionally the Commission, in its Order Denying Motion for Reconsideration of CLI-80-25 and Order for Temporary Modification of License (enclosed), considered the information forwarded in your letter.

I would also note that in an attempt to better understand the concerns of the Heidelberg group, a meeting including Dr. Franke (Mr. Alvarez and others) and NRC staff members was held on June 27, 1980.

In closing I should mention that decontamination of the TMI Unit 2 reactor building atmosphere has been completed safely. In contrast to the hypothesis included in the Heidelberg group's report, quantifiable amounts of radioactive particulates were not observed during the purge. I hope this information proves useful to you.

Sincerely,

Original Signed by  
H. R. Denton

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosures:

1. Memo from W. Kreger/B.J. Snyder to H. R. Denton dtd 6/23/80
2. Order Denying Motion for Reconsideration of CLI-80-25 and Order for Temporary Modification of License

OFFICE	TMIPD:NRR	TMIPD:NRR	NRR	NRR		
SURNAME	W. Dravers	B.J. Snyder	EGCase	HRDenton		
DATE	7/21/80	7/3/80	8/1/80	7/1/80		



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

June 23, 1980

Docket No. 50-320

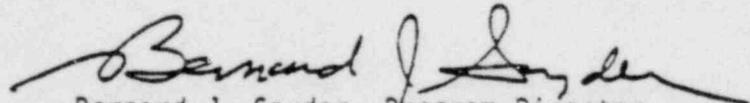
MEMORANDUM FOR: Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

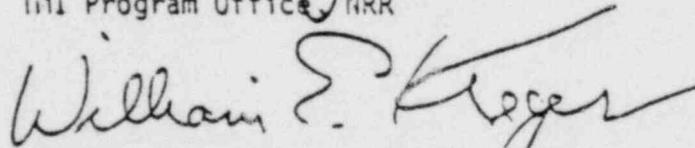
FROM: Bernard J. Snyder, Program Director  
THI Program Office, NRR

William E. Kreger, Assistant Director  
for Radiation Protection, NRR

SUBJECT: REPORT BY THE INSTITUTE FOR ENERGY AND ENVIRONMENTAL  
RESEARCH, HEIDELBERG, FEDERAL REPUBLIC OF GERMANY

In view of the public interest and in response to some comments on our initial reactions on this subject, we are providing some additional information in the attached write-up.

  
Bernard J. Snyder, Program Director  
THI Program Office, NRR

  
William E. Kreger, Assistant Director  
for Radiation Protection, NRR

Enclosure:  
As stated

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UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION

COMMISSIONERS:

John F. Ahearne, Chairman  
 Victor Gilinsky  
 Richard T. Kennedy  
 Joseph M. Hendrie  
 Peter A. Bradford



In the Matter of  
 METROPOLITAN EDISON COMPANY, et al.  
 (Three Mile Island Nuclear Station,  
 Unit 2)

Docket No. 50-320

ORDER DENYING MOTION FOR RECONSIDERATION OF  
 CLI-80-25 AND ORDER FOR TEMPORARY  
 MODIFICATION OF LICENSE

On June 12, 1980, the Commission issued a Memorandum and Order, CLI-80-25, which approved purging of the TMI-2 reactor building atmosphere as proposed by the NRC staff. The staff's proposal was described in detail in the "Final Environmental Assessment for Decontamination of the Three Mile Island Unit 2 Reactor Building Atmosphere," NUREG-0662, May 1980. This purging can be carried out in such a manner (a "slow purge") that the release of radioactive effluents, primarily krypton-85, will lie within the limits allowed by the technical specifications which are part of the TMI-2 operating license. A faster rate of purging is advantageous, however, for reasons discussed in the Memorandum and Order. To permit a faster purge the Commission issued an

on of License, which temporarily  
 as instantaneous and quarterly

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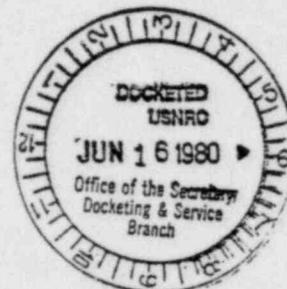
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CHRISTIC INSTITUTE  
A Religious Public Policy Center  
1324 North Capitol Street  
Washington, D.C. 20002  
(202) 797-8106

June 16, 1980



NRC  
1717 H Street, N.W.  
Washington, D.C.

Gentlemen:

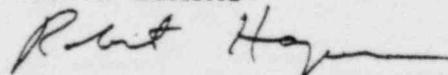
We are submitting under this cover a copy of a report prepared by the Institute for Energy and Environmental Research of Heidelberg, FRG, under the auspices of Bernd Franke. The summary of this report was submitted to Commissioner Ahearn during the public meeting held on June 5, 1980 by the NRC concerning venting of radioactive particulates and gases from the TMI Unit 2 reactor containment building. The report contains material that shows the proposed venting procedures to create significant hazards considerations that would be appropriately subject to the fact finding procedures of a public hearing.

We note with concern that your Order for Temporary Modification of License docketed on June 12, 1980 does not contemplate compliance with 10 CFR 2.10<sup>6</sup> as would normally be required where an amendment raises significant hazards considerations. While the question of whether or not the action proposed by the NRC will in fact present a significant hazard is still subject to debate, we firmly believe that the enclosed study by internationally recognized expert on the effects of radiation clearly shows beyond any doubt that there are significant considerations of hazard to the public health that deserve a full hearing before they may be adequately resolved.

We also note that the NRC in its Order of June 12, 1980 purported to rely upon 10 CFR 2.204 for the apparent authority to make its order immediately effective. While we have serious reservations whether this provision applies to others than the licensee it is clear that immediate effectiveness of the Order would depend upon a finding that the public health, safety and interest so requires. Not only has such a finding not been made by the NRC but we contend that the Heidelberg study makes abundantly clear that the public interest lies in according this issue of intentional release of radioactive materials into the atmosphere the full scale public hearing which its possibly profound consequences deserve.

We would appreciate your response to the issues we have raised in regard to the significant new light which the Heidelberg study casts on this issue.

CHRISTIC INSTITUTE

  
Robert Hager

RH:pa

6/17...To EDO for Direct Reply...Suspense: June 24...Cpys to: Chm, Cmrs, OPE, OGC  
(sent by courier to EDO, OPA, Snyder) orig to docket....80-1247

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RADIATION EXPOSURE DUE TO VENTING TMI-2  
REACTOR BUILDING ATMOSPHERE

A Study Prepared by the Institute for Energy and  
Environmental Research, Heidelberg,<sup>\*)</sup> Federal Republic  
of Germany for the Three Mile Island Legal Fund,  
Washington, D.C.

Bernd Franke and Dieter Teufel

Heidelberg, June 12, 1980

<sup>\*)</sup> mailing address: IFEU, Im Sand 5, 6900 Heidelberg, West Germany

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