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October 31, 1980

Dr. Bernard J. Snyder, Director
Three Mile Island Program Office
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Snyder:

The Draft Programmatic Environmental Impact Statement for the Decontamination of the Three Mile Island Nuclear Station Unit 2 is now available for comment. I have had the opportunity to review this document and a host of related reports, critiques and summaries and feel very strongly that the greatest weakness of the E.I.S. is the tendency to hedge or "best guess" some of the short and long range effects of the dumping of waste water into the Susquehanna River. The consequences of this cleanup are too critical to the Bay area and the population that resides in the area, to be left to what "may" happen if dumping is permitted in the near future.

The E.I.S. acknowledges that radioactive strontium and cesium may be detectable in fish and shellfish as far south as the Potomac River for as long as two years. It is also stated that cesium 137 will accumulate in detectable levels in the area of the Susquehanna flats near Havre De Grace. The half lives of strontium 90 and cesium 137 are 30 years and 28 years, respectively, so they will be an influence in the Bay for quite some time to come.

My reasons for opposing the dumping of the waste are not based upon misguided fear or emotional stress, but upon the inadequacies and unanswered questions not addressed in the E.I.S. Strontium and cesium are bioaccumulators which also accumulate as they move up the food chain. Food chain concentration is not addressed by the E.I.S. The Chesapeake Bay is one of the most productive bodies of water on the earth and must be protected from any degradation.

The disposition of high level wastes must also be spoken to. The resins to be used, if filtration techniques are employed, will be highly contaminated and should not be stored on the island for any prolonged period of time. The danger of flooding is great.

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Dr. Snyder

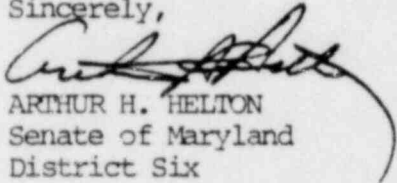
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The transporting of waste matter across the entire length of the United States appears to be a dangerous proposition, in light of the fact that there is another alternative. I am enclosing a copy of a letter recently forwarded to President Carter from Governor Harry Hughes, formally requesting the President's intervention with the Department of Energy regarding the disposal of high and low level waste.

On behalf of my constituency residing in Harford County, and the unusual threat this nuclear accident cleanup will have on everyone living in the State of Maryland and on the Bay, I oppose without question, the dumping of waste from Three Mile Island into the Susquehanna River. The people of Pennsylvania and Maryland should be exposed to as little danger as possible and I believe the Nuclear Regulatory Commission has a clear mandate to see that the people and the Bay are so protected.

Sincerely,



ARTHUR H. HELTON
Senate of Maryland
District Six

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Enclosure:As stated

cc:Honorable Harry Hughes



STATE OF MARYLAND
EXECUTIVE DEPARTMENT
ANNAPOLIS, MARYLAND 21404

HARRY HUGHES
GOVERNOR

October 3, 1980

The President
The White House
Washington, D. C. 20500

Dear Mr. President:

I am writing to request your assistance in a matter of great concern to the State of Maryland. The Nuclear Regulatory Commission's draft Programmatic Environmental Impact Statement for the Three Mile Island clean-up has failed to address any alternatives which provide assurance that the radioactive wastes will be removed from the island without decades of delay. All plans addressed require that the Department of Energy first establish a storage facility or repository for commercial high level radioactive wastes and high specific activity wastes. However, the lack of progress towards establishment of such facilities over the last 25 years renders any current schedules subject to skepticism.

There is one option which can guarantee the capability for timely removal from the island of the high level wastes, transuranic wastes, and those high specific activity wastes unacceptable at existing commercial repositories. This is for DOE to accept these wastes for storage with the similar wastes that DOE now handles from the defense-related nuclear projects. Although Maryland formally suggested during the scoping process that NRC consider this alternative, it was dismissed in the draft statement with the simple declarations that DOE policy does not allow for disposal of TMI low-level wastes at government facilities, and that DOE is studying the high-level waste problems.

I am therefore requesting that you use your authority as President to direct DOE and NRC to explicitly consider the technical feasibility of this option, and to direct DOE to make an exception to its policy by accepting these TMI clean-up wastes for which there is no available off-site storage facility.

The unusual nature of the accident derived wastes is reason enough for such an exception. The recent decision by the Pennsylvania Public Utilities Commission prohibiting use of revenue from ratepayers for the TMI clean-up, has created a situation of institutional instability for the Metropolitan Edison Company. This

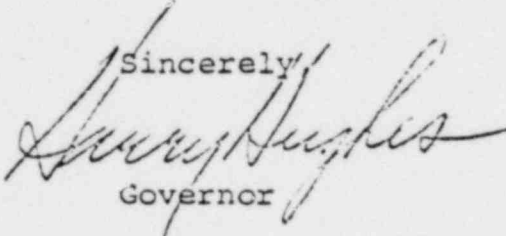
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makes it imperative to identify and confirm at this time a location to which the wastes can be removed. The clean-up activities should be planned and conducted in a manner that will insure that disposal with defense related nuclear waste remains a viable option.

The draft environmental impact statement reveals that federal agencies are following a course of action that will make Three Mile Island a long-term storage dump for radioactive waste. Nothing could be more dangerous to Chesapeake Bay and the people of Maryland. No responsible agency would locate a dump for radioactive waste on an island in a flood plain above the water supply of a major metropolitan area, and poised at the head of Chesapeake Bay. Yet, because of refusal to consider any other realistic alternative, that will be the result of actions described in the draft environmental impact statement.

Because this is an unusual situation and because of the unusual threat to people in Maryland and Chesapeake Bay, I am making this unusual request that you intervene with the Departments of Defense and Energy and insist that all of the radioactive waste be removed from Three Mile Island as quickly as safety will permit--even if it means disposing of them for some extended period with waste from defense operations.

I would appreciate your response at your earliest convenience.

Sincerely,

Governor