



THE

Maryland Watermen's Association INC.

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October 2, 1980

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

Dear Dr. Snyder:

Enclosed are comments from our organization that I understand will be made part of the public record on the Draft Programmatic Environmental Impact Statement (NUREG-0683).

I cannot stress enough the fact that the Susquehanna River and Chesapeake Bay must be protected throughout the entire clean-up process. Avoiding any further accidental or planned environmental degradation and stress to these natural resources is something we must do not only for the hundreds of thousands of people who depend on them for their livelihood, but for the entire population related to and linked to these resources in any number of ways.

As I understand it, the Commissioners of NRC will ultimately decide what methods of decontamination and disposal is used. When will this decision be made?

Also, I would like a list of the Commissioners.

Sincerely,

Debby George

Debby George
Administrative Director

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COMMENTS OF

THE MARYLAND WATERMEN'S ASSOCIATION, INC.

(PEIS), NUREG-0683

Draft Programmatic Environmental Impact Statement Related to Decontamination and Disposal of Radioactive Wastes Resulting from the March 28, 1979 Accident at Three Mile Island Nuclear Station, Unit 2

The Maryland Watermen's Association is a non-profit trade association working on behalf of all commercial fishermen in Maryland. Our organization represents 1800 individual watermen, that is, independent businessmen who have chosen as their profession harvesting various sorts of seafood from the Chesapeake Bay and delivering high quality seafood products to consumers. In addition to our 1800 individual members, we also represent 18 regional Watermen's Associations. We think you will agree that watermen have a definite vested interest in protection of the Chesapeake Bay from it's headwaters to the mouth and a definite vested interest in people's perception and opinion of the quality of the waters of the Bay and seafood harvested from it.

Having spent a good deal of time reveiwing the PEIS we must conclude that it is insufficient and damaging itself to the integrity of Chesapeake Bay seafood. This document was not submitted for the general public. It does not address concerns of the general public. It is not written and prepared in terms that laymen and laywomen or consumers or the general public or anyone other than a "scientist" can easily understand.

At least one of the reasons this is so critical is addressed -- VERY BRIEFLY -- in the PEIS itself. In the Summary at the beginning of the document, page S-11, under the heading Socioeconomic Effects, it is stated..."Potential economic impacts include the effects of increased electricity rates, reduced tourism, and possibly resistance to consumption of agricultural and fishery products that the public may think are radioactively contaminated. Families involved in agricultural production are likely to be affected to the largest degree." Further in the same section..."Low but measurable concentrations of Cs-137 would persist in sediments in both the river and the bay for some years following a discharge of water from TMI-2, but the levels would be so low as to have no radiation effects on aquatic species or on man. If these effects are understood by consumers, the marketability of fishery products from

those bodies of water should not be adversely affected. It is therefore important that the public be properly informed if and when such releases occur." (end quote from PEIS) As to the statement that if the effects of the clean-up are properly understood the marketing of seafood products should not be adversely affected, we must go back to our comment on the PEIS itself. This is not an example of properly informing the public of effects.

The marketing of seafood products of the Bay, and indeed of the entire nation, is a long time goal we are just now catching up on. Potential damage that exists from this situation could be just tremendously damaging to our overall goals and to the economy of our state. This is not even addressed in the PEIS.

We need to have more public participation in this process. Now. Even if it means slowing down the overall clean-up process slightly. We are not saying the clean-up process should be slowed excessively, but we do need to "properly inform the public." We need a Citizen's Advisory Council on this one, respected and recognized citizen's representatives need to be involved in every step that occurs in the clean-up process.

It was stated by Dr. Bernard Snyder of the TMI Program Office that 25 public meetings had been held to explain and receive comments on the PEIS and alternatives discussed in it and that he felt this was "quite sufficient".⁽¹⁾ We do not feel 25 meeting of this type are sufficient to properly inform the public of what is being done about clean-up of the TMI accident.

At the Annapolis, Maryland September 30, public meeting Dr. Snyder stated rather emphatically several times that the release of processed water from TMI into the Susquehanna River was only an alternative, that the NRC was definitely open to other alternatives; that it was a "very bad assumption" to think the water would definitely go down the Susquehanna. However, all throughout the PEIS and during presentation of NRC Staff at the public meeting we were able to attend, continually the alternative of dumping into the Susquehanna and dilution into the Chesapeake Bay comes up as the favored method of disposal and it is very evident that most of the energy invested into these alternatives focused on the Susquehanna dumping method. We must consider this "dumping" and we can not condone, support, understand or lend credence to this as a viable solution. The Upper Chesapeake Bay fisheries are in a critical condition.

⁽¹⁾ Public Meeting sponsored by MD. Department of Natural Resources and Nuclear Regulatory Commission, Annapolis, Maryland, Sept. 30, 1980

Maryland Watermen's Association, Inc.

Comments: PEIS, NUREG-0683

Page three

The Maryland Department of Natural Resources, Tidal Fisheries Division recently concluded a survey of the population of shad in the Upper Bay. The concluded there were only between 2400 and 7500 fish (shad) present in the entire Upper Bay. 2400 - 7500! For some time now various finfish have not been reproducing in the Chesapeake Bay. The only answer to this, so far, the Maryland Department of Natural Resources has been able to discover is that "there is something wrong with the water."⁽²⁾ Suppose those "low but measurable" quantities of Cs-137 were to persist in the bodies of those 2400-7500 finfish that are in the Bay now? We cannot condone anything so potentially dangerous to the presently (undeclared) endangered species of the Chesapeake Bay.

The final concern we will voice here is there appears to be some consternation and indeed disagreement within the scientific community over some of the data that is the basis of the conclusions in this PEIS. This must be resolved. Because of this, we must agree with the Maryland Ad-Hoc Committee on TMI, that an independent group of scientists needs to be appointed to either further study the processes the EIS uses or confirm the validity of the concepts used and conclusions reached. This group of independent scientists needs to be selected by the citizen's group we mentioned earlier or another citizens group.

(2) Quote from W.R. Carter, Maryland Dept. Natural Resources, Tidal Fisheries Division at a meeting of the Maryland Watermen's Assn., Inc. Board of Directors; September 5, 1980