



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

JAN 13 1981

Docket No. 50-320

Mr. Gale Hovey
Director & Vice President, TMI-2
Metropolitan Edison Company
P.O. Box 480
Middletown, PA 17057

Dear Mr. Hovey:

We have reviewed the comments on the Three Mile Island (TMI) Draft Programmatic Environmental Impact Statement (PEIS) submitted by your letter dated November 7, 1980. These comments will be considered in preparation of the final PEIS. However, I want to respond now to several of the comments related to waste management.

1. Comment No. 8 of page 4 of Attachment A recommends that the NRC establish disposal criteria for wastes generated at TMI as soon as the waste forms are identified. The final waste forms and contents of the wastes generated to date (principally EPICOR-II wastes) are not yet completely established by Met-Ed. However, the NRC has stated that wastes which have the same characteristics as routinely generated nuclear power plant wastes would be acceptable for disposal at commercial shallow land burial sites. In addition, for those generated wastes which are clearly unique to TMI and which Met-Ed has identified (i.e., first stage EPICOR-II wastes), NRC has provided qualitative disposal criteria as noted below. NRC staff has indicated that high-activity EPICOR-II ion-exchange wastes could be disposed of at a commercial land burial site at an arid location provided these wastes are solidified and special disposal procedures are included to minimize exposure to inadvertent intruders. The final PEIS will also consider the alternative of transferring these wastes to DOE for suitable processing into a solid that could be disposed of in the high-level waste repository. In addition, NRC staff has also indicated that the contemplated first stage zeolite wastes from the proposed Submerged Demineralizer System (SDS) having Cs-137 activities on the order of 1000 Ci/ft³ from processing reactor building sump liquids are more like high-level wastes than material that is normally disposed of at commercial land burial sites.



8102040 606

JAN 13 1981

Therefore, despite Comment 36 on page 20, Met-Ed has been advised that the assumption that these wastes can be disposed of in a commercial shallow land burial system is not valid.

Comment No. 8 on page 4 also recommends that the approach to make disposal decisions on a case-by-case basis be avoided. For unique wastes which have not been encountered in the commercial nuclear industry and are yet to be identified by Met-Ed, we believe that specific disposal criteria cannot be developed since the criteria are dependent on the radionuclides present, the specific activity, physical and chemical form of the waste product and on the available disposal options. These parameters represent unknowns for many wastes which could and may likely be generated at TMI. NRC will assign a high priority to making decisions regarding the management of wastes following the receipt from Met-Ed of data which provide the characteristics of the proposed wastes and the proposed disposal options. To the maximum extent possible, the PEIS will be prepared to bound the possible alternatives.

2. Comment No. 5 on page 2 indicates that Met-Ed does not expect to load organic resins beyond 10 Ci/ft^3 ; however, about 45 EPICOR-II liners are already loaded to approximately 40 Ci/ft^3 based on Met-Ed data. In addition, Comment No. 17 on page 10 and No. 29 on page 26 indicate that the 1300 Ci administrative limit of EPICOR-II first and second stage liners were imposed based on two specific shipping cask designs. The comments also suggest that Met-Ed could load the resins further if other casks were available. NRC staff has questioned Met-Ed regarding the potential for radiation degradation of organic resins loaded to high specific activities. Until this question has been resolved NRC considers it prudent to implement a maximum limit, with regard to radiation damage, for bulk loading of liners containing organic resins, such as the 10 Ci/ft^3 limit identified in 1.6.1.2 of the DPEIS. Based upon the availability of adequate tankage capacities for handling waste water, Met-Ed has proposed to limit the operation of the EPICOR-II in the near future unless now unforeseen needs develop.

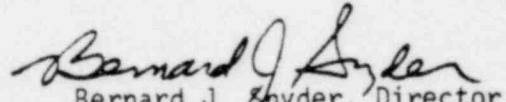
Mr. Gale Hovey

- 3 -

3. Comment 31 on page 13 indicates that Met-Ed believes that the activity of Cs-137 is sufficient for discussion of total activity inventories. The NRC staff believes that when estimating radioactive inventories in wastes, the entire radioactive decay chain must be included (i.e., Ba-137m when considering Cs-137 and Y-90 when considering Sr-90).

If you have any questions regarding the items above, please contact Mr. Robert E. Browning (301/427-4200).

Sincerely,


Bernard J. Snyder, Director
TMI Program Office

Mr. Dale Hovey
Metropolitan Edison Company

Mr. J. J. Barton
Manager, Site Operations, TMI-2
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. E. D. Fuller
TMI-2 Licensing Supervisor
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. E. G. Wallace
PWR Licensing Manager
GPU Service Corporation
100 Interpace Parkway
Parsippany, NJ 07054

Mr. J. B. Liberman, Esquire
Berlack, Isaacs, Liberman
26 Broadway
New York, NY 10004

Mr. G. T. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, DC 20036

Dr. Walter M. Jordan
881 W. Outer Drive
Oak Ridge, TN 37830

Dr. Linda W. Little
5000 Hermitage Drive
Raleigh, NC 27612

Karin W. Carter, Esquire
505 Executive House
P. O. Box 2357
Harrisburg, PA 17120

Honorable Mark Cohen
512 E-3 Main Capitol Building
Harrisburg, PA 17120

Ellyn Weiss, Esquire
Sheldon, Harmon, Roisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Mr. Steven C. Sholly
304 S. Market Street
Mechanicsburg, PA 17055

Mr. Thomas Gerusky
Bureau of Radiation Protection
P. O. Box 2063
Harrisburg, PA 17120

Mr. Marvin J. Lewis
6504 Bradford Terrace
Philadelphia, PA 19149

Ms. Jane Lee
R. D. 3, Box 3521
Etters, PA 17319

Walter W. Cohen, Consumer Advocate
Department of Justice
Strawberry Square, 14th Floor
Harrisburg, PA 17127

Robert L. Knupp, Esquire
Assistant Solicitor
Knupp and Andrews
P. O. Box P
407 N. Front Street
Harrisburg, PA 17108

John E. Minnich, Chairperson
Dauphin Co. Board of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, PA 17101

Robert G. Pollard
Chesapeake Energy Alliance
609 Montpelier Street
Baltimore, MD 21218

Chauncey Keppford
Judith H. Johnsrud
Environmental Coalition on Nuclear Power
433 Orlando Avenue
State College, PA 16801

Ms. Frieda Berryhill, Chairperson
Coalition for Nuclear Power Plant
Postponement
2610 Grendon Drive
Wilmington, DE 19808

Holly S. Kack
Anti-Nuclear Group Representing York
245 W. Philadelphia Street
York, PA 17404

John Levin, Esquire
Pennsylvania Public Utilities Commission
P. O. Box 3265
Harrisburg, PA 17120

Jordan D. Cunningham, Esquire
Fox, Farr and Cunningham
2320 R. Second Street
Harrisburg, PA 17110

Ms. Kathy McCaughin
Three Mile Island Alert, Inc.
23 South 21st Street
Harrisburg, PA 17104

Ms. Marjorie M. Aasvedt
R. D. 45
Coatesville, PA 19320

Ms. Karen Sheldon
Sheldon, Harmon, Roisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Earl B. Haffean
Dauphin County Commissioner
Dauphin County Courthouse
Front and Market Street
Harrisburg, PA 17101

Government Publications Section
State of Library of Pennsylvania
Box 1601 Education Building
Harrisburg, PA 17127

Dr. Edward O. Swartz
Board of Supervisors
Londonderry Township
870 #1 Meyers Church Road
Middletown, PA 17057

U. S. Environmental Protection Agency
Region III Office
ATTN: EIS Coordinator
Curtis Building (Sixth Floor)
6th and Walnut Streets
Philadelphia, PA 19106

Dauphin County Office (Emergency
Preparedness
Court House, Room 7
Front and Market Streets
Harrisburg, PA 17101

Department of Environmental Resources
ATTN: Director, Office of
Radiological Health
P. O. Box 2063
Harrisburg, PA 17105

Governor's Office of State
Planning and Development
ATTN: Coordinator, Pennsylvania
Clearinghouse
P. O. Box 1323
Harrisburg, PA 17120

Mrs. Rhoad D. Carr
1402 Marine Drive
Harrisburg, PA 17109

Mr. Richard Roberts
The Patriot
812 Market Street
Harrisburg, PA 17105

Mr. Robert B. Barsun
Babcock & Wilcox
Nuclear Power Generation Division
Suite 420, 7735 Old Georgetown Road
Bethesda, MD 20814

Ivan W. Smith, Esquire
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section
U. S. Nuclear Regulatory Commission
Washington, DC 20555

POOR ORIGINAL