

as Amended Board of Education  
Prince, MD

# Maryland Ad Hoc Committee on Three Mile Island

Contact: John Kabler (301) 235-8808 or 235-8810

//

STATEMENT  
OF THE  
MARYLAND AD HOC COMMITTEE ON THREE MILE ISLAND  
AND  
CLEAN WATER ACTION PROJECT  
TO THE  
NUCLEAR REGULATORY COMMISSION  
AND THE  
MARYLAND DEPARTMENT OF NATURAL RESOURCES

September 30, 1980

The accident at Three Mile Island left more than a million gallons of radioactive water at the plant, including 600,000 gallons of highly radioactive water still in the containment building. Metropolitan Edison has said that its preferred plan for disposing of this water is to treat it to remove most of the radioactivity and then discharge the water into the Susquehanna River, source of drinking water for several communities downstream (and a backup source for Baltimore) and potential polluter of the priceless Chesapeake Bay, an enclosed and very fragile ecosystem.

A year and a half after the accident the radioactive decontamination of the damaged reactor continues to threaten the health and safety of Maryland citizens while the government's handling of decontamination procedures has seriously eroded the public trust and confidence in state and federal regulatory agencies and governmental safeguards.

The Nuclear Regulatory Commission (NRC) has consistently and effectively precluded the public from adequate participation in the analysis, and subsequent decision making process, concerning the radioactive clean up at TMI. Examples include the purchase and installation of Epicor 11, time constraints imposed in the decision making for the purging of Krypton-85 and NRC's failure to follow up on its promise to form a citizen advisory committee with funding for independent scientific review.

On August 14, 1980, the NRC released its draft Programmatic Environmental Impact Statement (D-PEIS) concerning decontamination and disposal of radioactive wastes at TMI. Under pressure from citizen's groups and Pennsylvania Governor Thornburgh, the NRC has extended the comment period on the D-PEIS until November 20, 1980.

Although we appreciate the NRC's decision to extend the comment period, there are basic flaws in the D-PEIS which cannot be properly addressed through the public comment process and must, instead, be resolved through further studies by the NRC, with subsequent public review and comment.

8010240609

POOR ORIGINAL

Independent scientists queried by the Ad Hoc Committee have criticized the D-PEIS on numerous points. Examples include questions raised about incorrect mixing projections, inaccurate and misleading Susquehanna River flow rate figures and inadequate and confusing data concerning quantities of radioactivity involved in various waste products. Other problems in the draft statement, according to Union of Concerned Scientists representative Robert Pollard and others, bring into question the validity of the entire document.

Some basic flaws in the PEIS which might require separate environmental impact statements:

1. The problem of how and where to dispose of the wastes resulting from the accident and cleanup process is inadequately considered. There is no assurance that any waste site will accept the low-level waste in the amount postulated by the NRC staff and ultimate disposal of high-level waste remains an unresolved question.
2. The NRC staff dismisses the question of whether TMI-2 will be decommissioned or prepared for restart by stating that it is not within the scope of the PEIS. In reality the methods of cleanup are very dependent on the decision to restart or to decommission the unit. Certain processes could severely damage the equipment, making the final disposition question essential in selecting the proper methods to be used. Thus the question of restart or decommissioning of the plant must be considered in depth within the PEIS.
3. There is a total lack of cost estimates in this evaluation phase of the PEIS. The NRC staff has promised that the cost factors will be provided in the final PEIS (after the period for public comment has passed). The lack of opportunity for public comment on economic aspects of the cleanup provides an example of how the public is being excluded from the decision making process. In view of the precarious financial condition of Metropolitan Edison, the NRC's assertions that costs are not a limiting factor can hardly be viewed as realistic.
4. In the PEIS the NRC makes the assumption that cesium and strontium from the planned release of processed water (which will contaminate Chesapeake Bay seafood as far south as the Potomac river) will not effect the marketability of the seafood. A separate EIS that includes market research data on radioactivity in Chesapeake Bay seafood must be performed prior to making any determinations as to the effects of radioactive contamination of Bay seafood on the seafood industry.

POOR ORIGINAL

The controversy that exists today is not simply over the D-PEIS and the proposed methods of radioactive decontamination at TMI; It also involves serious doubt, if not suspicion, about the government's real intentions in handling the problem. When public officials or citizen organizations request better avenues for citizen involvement in the decontamination decision-making, the NRC public relations staff responds with self serving explanations of NRC policy and procedures and, typically, no response at all to the specific request.

NRC's method of dealing with the decontamination process has been both inappropriate and irresponsible. Instead of dealing directly and effectively with the cleanup, NRC has preferred to let things drift until a crisis occurs and then, as in the case of Epicor 11, justify subsequent ill-considered actions by blaming the crisis.

NRC officials appeared to be responding to the credibility crisis they had created by publicly agreeing to appoint a citizen advisory panel with funding for independent scientific review in March, 1980. Their refusal to follow up on this promise has further alienated a skeptical public

Whereas it may be easier to make a decision with incomplete information, it will be more difficult to live with the consequences. In our view, it is indefensible that NRC continuously avoids the scientific and public input that, if properly considered, could lead to a safe, effective and politically acceptable cleanup at TMI.

More seriously, NRC now proposes to make a complete mockery of the NEPA process by refusing to hold public hearings on the draft PEIS. CEQ regulations call for such hearings when there is "substantial environmental controversy concerning the proposed action or substantial interest in holding the hearing."

What could be more controversial than the radioactive decontamination of the nation's most serious nuclear accident, located at the headwaters of the world's most valuable, and ecologically sensitive, estuarine system -- the Chesapeake Bay.

NRC must work to restore the public's trust and confidence in their capability and objectivity in determining the best course of action in regard to the cleanup at TMI. Failure to do so will result in increasingly effective citizen action in opposition to NRC plans.

In order to resolve the crisis of credibility that NRC has created, and to restore the public trust and confidence, NRC should agree to hold well publicized public hearings in Baltimore

4.

and Harrisburg or Middletown, and to re-initiate its stalled agreement to appoint a citizen advisory committee with funding for independent scientific review.

No new actions concerning the decontamination of TMI should occur until NRC has redesigned their PEIS in response to the public's criticism and the findings of an independent scientific panel.

Finally, no radioactive water from TMI-2 should be released to the Susquehanna, until scientific controversy concerning the safety of such action has been resolved, until NRC and Metropolitan Edison can prove that such releases will not affect the marketability of Chesapeake Bay seafood and until citizens living downstream from the damaged reactor agree to such releases.



12

# POOR ORIGINAL

First of all, I urge the Nuclear Regulatory Commission to hold public hearings, both in Maryland and Pennsylvania, on the PEIS. It seems to me that the criteria in the Council of Environmental Quality regulations, 40 CFR 1500.7, the importance of the proposals, complexity of the issues, degree of interest in the proposals and the extent of public involvement already achieved, would indicate that public hearings should be held.

I'd like to comment on the prospect of Metropolitan Edison running this cleanup. As I understand it, the NRC will not choose the method of the cleanup but only has a veto over the method Met Ed chooses. We Marylanders who may drink the water possibly released from Three Mile Island or eat the seafood that lives in it, need assurances that the NRC will require Met Ed to use the safest method for the cleanup.

Metropolitan Edison is in bad shape financially. Two weeks ago, it laid off a large number of workers, including 500 working on the cleanup. The NRC should devise plans to continue the cleanup should Met Ed go bankrupt and should devise plans to determine if Met Ed is scrimping on the cleanup to save money in a manner which could jeopardize the health and safety of our citizens.

The cleanup is a unique and difficult technical problem. Met Ed does not have a reputation for technical excellence. Saturday's Baltimore Sun notes that an NRC study found 37 serious deficiencies at the TH1-1 control room and 50 less

POOR ORIGINAL

serious deficiencies. This leaves the observer with the fear that Met Ed will not do the excellent job required to make the cleanup safe. The NRC must develop plans to monitor the cleanup to see it is being done correctly.

Finally, the NRC must realize that the public does not have great faith in it and Met Ed. There must be some assurance for the public that this process is being done correctly. There must be a truly independent, knowledgeable, well financed body to monitor the cleanup so that we Marylanders who drink Susquehanna River water are not having their health jeopardized and we Marylanders who make their living from the Chesapeake Bay are not having their livelihoods jeopardized.

Kenneth May