

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY & LICENSING BOARD FEB -8 P3:32

OFFICE OF SERVICE
DOCKETING & SERVICE
BRANCH *amp*

In The Matter Of)
Metropolitan Edison Company)
Three Mile Island)
Nuclear Generating Station)
Unit I)

Docket 50-289



Additional Aamodt Exceptions To Partial Initial
Decision Of December 14, 1981 - Emergency Planning Issues

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February 5, 1982

The Aamodts amend their filing of January 26, 1982 to add the following exceptions to the Partial Initial Decision of December 14, 1981.

34. The Board overlooks major areas covered in the record of the hearing and raised in the Aamodt findings. These areas include whether the farmers can and will undertake protective actions.

35. The Board, in paragraph 1923, fails to recognize that livestock are potential sources of food to be protected from radiation.

36. The Board, in paragraph 1925, footnote 214, errs in failing to examine whether the Commonwealth of Pennsylvania's provision of protective equipment would be adequate to protect the farmers.

37. The Board, in paragraph 1926, footnote 215, errs in misuse of record citations. The Board fails to support their conclusion.

38. The Board has no record support that guidance for food protection would be distributed to all farmers within the TMI plume emergency planning zone. The Board misapplies the TMI plume emergency planning zone as appropriate ingestion protection zone. (Paragraph 1927).

39. The Board misused the record in paragraph 1927 in citing the testimonies of Witnesses Lytle and Samples at Tr. 18, 738, 18, 766 - 18, 767. The Board overlooked numerous record evidence that supported an unqualified conclusion.

40. The Board, in paragraph 1928, grossly distorts the record in their conclusion.

41. The Board, in paragraph 1928 footnote 217, fails to resolve the conflict of the evidence cited with FEMA testimony.

42. The Board, in paragraph 1935 footnote 218, fails to resolve a conflict in the FEMA and Commonwealth positions regarding the provision of protective equipment to the farmers.

43. The Board, in paragraph 1937, provides no support for their assertion that those farmers who choose to remain with their herds will be informed in measures for self-protection.

44. The Board, in paragraph 1937, fails to explain how providing equipment for York County agricultural emergency workers is sufficient.

45. The Board, in paragraph 1677, fails to reconcile evacuation time estimates with paragraph 1925 where it is stated that farmers are allowed to evacuate their livestock.

46. The Board, in paragraphs 1925 through 1940, disregards the testimony of the county agricultural agents, the best evidence concerning the issues discussed therein, particularly the understanding and responsibilities of the agents, as stated in paragraphs 1925, 1926, 1928, 1929, 1932 and 1940.

47. The Board, in paragraphs 1925 through 1940, disregards the testimony of the farmers, the best evidence concerning the issues discussed therein.

48. The Board, in paragraph 1929, failed to resolve its conclusions with the testimony of FEMA.

49. The Board fails, in paragraphs 1919 through 1940, to recognize or address the need to identify the farm population and the livestock population in the TMI plume emergency planning zone and the ingestion zone.

50. The Board fails, in paragraphs 1919 through 1940, to recognize or address the financial aspects of livestock ownership which can constrain the farmers to take personal protective action.

51. The Board fails, in paragraphs 1923, 1924 and 1937, to resolve its definition of property with the best evidence of the record, the farmers' testimony.

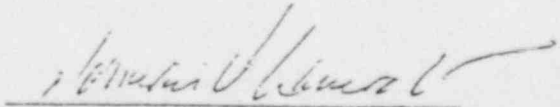
52. The Board errs at 1717 in finding that "milk sampling for radioiodine is more meaningful and more accurate for evaluating doses to man than measuring animal thyroids".

53. The Board errs at 1719 with regard to the relationship of increased frequencies of neonatal hypothyroidism and infant mortalities to radioiodine emissions during the TMI-2 accident as claimed by Dr. Molholt.

54. The Board errs at 1721 in its reliance on the conclusions of the Hypothyroidism Epidemiological Investigative Committee.

55. The Board errs at 1723 in finding "no basis to conclude that alleged increases in neonatal hypothyroidism and infant mortality following the TMI-2 accident were caused by that accident".

56. The Board errs at 1723 in finding that existing protective actions are not "insufficient to protect the fetus or to require the use of different or lower protective action guides".


NORMAN O. AAMODT

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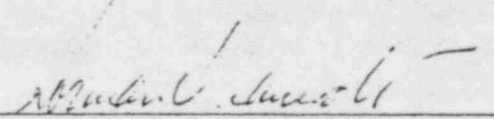
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Additional Aamodt Exceptions To Partial Initial Decision of December 14, 1981 - Emergency Planning Issues.



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February 5, 1982

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