

QUESTIONS ON THE DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (PEIS)

Relating to decontamination and disposal of radioactive wastes at Three Mile Island, Unit 2.

We have the right protected by the constitution to be born and to live mentally and physically unimpaired. Neither the NRC nor any other governmental body has the authority to cause persons of the United States to develop fatal cancers as a result of the deliberate distribution of radiation into the environment which could otherwise be avoided and which is not related to the needs of national security.

1. The Council on Environmental Quality (CEQ) regulations to implement the national Environmental Policy Act (section 1506.6) and CEQ guidelines on Preparation of an EIS (Section 1500.7) call for hearings when there is substantial environmental controversy concerning the proposed action (draft PEIS) or substantial interest in holding the hearings.

First, please define hearings? Is this what we might call a meeting? When are the public hearings scheduled?

2. The draft PEIS proposes separate environmental statements on issues that we have yet to encounter in the clean-up. This segmentation fails to take into account the effects on the other steps in the clean-up and the cumulative impact of the the individual clean-up steps to the environment.

Shouldn't an Environmental Impact Statement develop a program of compatible processes to bring about the safe and expedient clean up of TMI 2.?

3. How can this be considered an Environmental Impact Statement when Appendix B, Commissions Statement of Policy, reads, "it is unrealistic to expect that the programmatic impact statement will serve as a blueprint, detailing each and every step to be taken over the coming months and years with their likely impacts. The planned programmatic statement inevitably will have gaps and will not be a complete guide."

4. The PEIS, if it is to operate in accordance with the purpose of the National Environmental Policy Act, will engage the public in the Commissions decision making process.

How will the public participate in this decision making ?

5. The Susquehanna River supplies domestic water to Columbia Borough, City of Lancaster, Safe Harbor Village, Holtwood Village, city of Chester, City of Baltimore, Conowingo Village, Bainbridge Naval Training Station including Port Deposit, Perry Point Veterans Hospital and Havre de Grace. Section 3-19 of draft PEIS states the Susquehanna's use as a community water supply is very limited. Please explain ?

6. The draft PEIS proposes to discharge tritium containing water and venting Krypton gas because of the renewable nature of the Susquehanna River and the regenerative powers and vast disperive capacity of the atmosphere (Section 10-27).

Is this a violation of the Clean Water Act, prohibiting discharge of radioactive wastes into navigable waters and a violation of the National Environmental Policy Act (Section 1508.7) concerning impact on the environment which results from the incremental impact of the action when added to other past, present and resonable foreseeable future actions ?

7. The Clean Water Act prohibits discharge of radioactive wastes into navigable waters causing further dilution and dispersal of radioactivity into the environment. Would any proposed dilution of radioactive processed waste (accident or clean-up) conforming to NRC standards, discharged into the Susquehanna, violate the intent of the Clean Water Act?

8. Throughout the draft PEIS, dumping of processed accident and clean up water is discussed. What is the effect of tritium and other radioactive materials on the plants, fish, benthic (plants and animals at the bottom of the sea, river) organisms and other wild life which inhabit the down stream portions of the Susquehanna River, all of which may enter the food chain directly or indirectly ?

9. Is it true that the use of Epicor II, a system for the clean-up of radioactive contaminated waste water, has not eliminated any radionuclides from the nuclear plant site thus far? Is it true that we have tritiated water to store and extremely radioactive resin filters that cannot be trucked off the island?

10. Section 5-36 states that Epicor II spent resin filters will be immobilized with cement and packaged in 55 gallon drums. What is the condition of the filters today? What does your own report from Brookhaven say about cesium and the ability of cement to immobilize it?

11. Why does Met Ed continue to spend significant amounts of money and time constructing the Submerged Demineralizer System (SDS) when the EIS is still in a draft form? There is no reassurance this system will be approved as best to protect the environment and health and safety of the public. Will this expenditure prejudice the NRC's decision as to which alternative for clean up of highly radioactive water will be best?

12. The public has been assured that radiation doses received during clean up operation is equivalent to or below that of a normal operating reactor. Does this include the krypton venting and the dumping of 400,000 gallons of radioactive water.?

13. Section 10-11 draft PEIS, charts health effects and offsite doses from normal plant operations. How can this chart be used with an accident situation like we have at TMI 2?

14. Does the NRC feel that a digging clamshell, used to gouge out and shear segments of the core is a viable alternative for reactor core removal? Fuel rods are brittle due to accident heat levels, making krypton gas releases eminent with the destruction of the protective cladding, the metal casing.

15. Why are clean up procedures not postponed until the adoption of the final EIS? Section 1506.1 of the National Environmental Policy Act states until an agency issues a record of decision, no action concerning the proposal shall be taken which would limit the choice of reasonable alternatives. We've had the krypton gas venting, operation of Epicor II, now the construction of the SDS.

16. What storage facilities handle spent fuel? Will they handle the damaged reactor core and other highly radioactive wastes, such as Epicor II filters, or proposed SDS filters?

17. What is to happen with reactor spent fuel? The draft PEIS, Section 2-10, discusses reprocessing of spent fuel, what is the current national policy on reprocessing? Section 3-32, draft PEIS, states processing of spent fuel is not a viable alternative.

18. Section 3-15 draft PEIS, Natural Radiation, should be interpreted to mean normal background including the effects of fallout from past nuclear weapons detonations, past accidental releases of radiation, normal operational reactor releases or radiation and releases from the entire fuel cycle. How does the Draft PEIS take into consideration the cumulative impact? National Environmental Policy Act Section 1508.7 defines cumulative impact as the impact of the environment which results from the incremental impact of the action when added to other past, present and reasonable foreseeable future actions individually minor but collectively significant action taking place over a period of time.

19. Is ionizing radiation the greatest threat to plant workers and area residents during the clean up of TMI 2? Has ionizing radiation been known to cause such human illnesses, as cancer (including leukemia), sterility, genetic mutations, birth defects, cataracts, skin lesions, loss of hair and shortened life span? The results of genetic damage is to cause birth defects in the children of parents exposed to ionizing radiation.

20. Is an Evacuation Plan a requirement for obtaining an operating license for a nuclear power plant? Do we have a working Evacuation Plan?

21. Does the normal operating license of a nuclear power plant include the use of a decontamination system, currently in use at TMI 2?
Was Metropolitan Edison's license amended?

22. Commercial nuclear power plants are not designed with special considerations for large scale decontamination operations (Section 1-17, DPEIS) Decontamination of various types has been necessary since the 1940s (Section 1-11-1-17 dPEIS) This should be covered under safe plant operation, why is a large scale decontamination system not considered under commercial nuclear power plant licensing requirements?

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