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Sept. 30, 1980

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Subject: Draft EIS on TMI July 1980 NUREG 0683
Docket No. 50-320
Public Comment

Gentlemen:

The following are comments on the draft EIS on TMI. Overall, the long complex document is very disappointing. On most of the issues which directly affect those of us who live near the accident site, determinations are put off, incomplete, cannot be presently solved in a satisfactory manner or are unknown. The conclusion after reading it must be that the NRC intends to treat the cleanup as only slightly more involved than previous accidents, to utilize past methods of decontamination although the scale is vastly larger and longer and to ignore their own conclusion that the island is completely inappropriate as a waste site, even a temporary one. There is no attached estimate of costs, which ignores the crucial point: is this method of electrical generation for commercial purposes rational? The potential health effects are segmented into unrelated pieces, so as to minimize their effects when truly estimated over an area's total impact. Lastly, a refusal to deal with the re-opening of Unit One as related, and the question of the goal: decommissioning or restart, makes the document pointless and appear to be one long exercise in regulatory obstruction.

Specifics:

1. Although continually the document states that the site is not appropriate for a waste site, it will continue to be one for an unknown amount of time.

Example: p. 3-32 Sec 3.2.3. , p. 2-2 Sec 2.0 among others too numerous to quote.

The NRC has continued to operate these plants without a solution to the waste issue. According to this document it will now operate a temporary waste facility in violation of its own regulations. This site contains, and will contain in ever-increasing amounts as the resins accumulate from EPICOR I, II and the SDS systems unique medium level and high level waste which cannot be accepted by any dump now operable.

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On p. 2-17 Sec 2.2.3. the special nature of the wastes is noted and we who live near it are told:

" special measures may have to be taken"

what measures? when? under what guidelines? to where? who pays for it?

p.2-14 Sec 2.2.2.:

" ...it was never anticipated that such wastes would be created. Accordingly, the wastes resulting from TMI-2 cleanup will have to be reviewed on a case-by-case basis..."

and how will we who live under their threat respond? do we review each case? how will we know what is going on? if the decisions are being influenced by cost considerations, how can that be stopped

If the NRC feels that this type of proposal is a full environmental impact statement of how to clean up Three Mile Island, I am appalled. What we are being asked to accept is a blind faith judgement that someday in the future, someone will decide on a case by case basis what to do with the waste. Trust them.

2. While we are waiting for this decision and the money to finance it and a location to which to take it, the resins, to pick one is used as an example, will be stored on the island, in the current desilting basin region. p. 10-19,20, Sec. 10.5

The document then discusses a PMF or probable maximum flood, determined in some unspecified way but assumedly from the Agnes storm of 1972. A description of the casing of the containers, lids etc. ensues with estimates of how deep the water will be and for how long. It is confidently concluded that leakage is not possible in any major way because:

"... the PMF would top the station dike for only four days..."
p.10-20 Sec. 10.5.3.

and

"...There is no driving force for release of radionuclides except diffusion in water, and that would begin only when a continuous water path were available..."
p. 10-20 Sec. 10.5.3.

For the NRC to base its storage planning on a theoretical projection that any flood in the Susquahanna River will only cover the resins for four days is incomprehensible. To then state that the only way leakage will occur is if they are wrong, and a bigger flood happens and provides the "continuous water path" boggles the mind. If NRC has assurances from the forces which determine weather cycles that no bigger flood will occur between now and when the wastes are stored in a "permanent deep geological repository", they should so document. All available data from other sources such as the National Flood Insurance Program is exactly contrary. The Susquahanna River is projected to be subject to greater and increasing flooding problems in the future, due to increases in impermeable surfaces such as parking area construction due to greater developmental density in the region. Lancaster County has numerous watershed studies underway now to diminish the flooding problems already related to growth. If it is not true that the river's flooding problems are on the increase, then why did the Pennsylvania State legislature pass last session Act 282 specifically demanding each county develop storm water management regulations to deal with the issue? Are they to be designated as "phobic", or unduly concerned with the "what ifs" instead of the realities of a situation, as the document refers to those who continue to show signs of stress related to cleanup?

To store wastes of this nature at this site at all involves jeopardizing the safety of the largest fresh water estuary on the Eastern seaboard. It is unconscionable, and should be rejected by the Commission outright. Unfortunately, due to previous grievous errors in judgement by the same Commission, they are between the devil and a hard place. They have developed this industry without planning for the waste. They have no where to put it. This EIS now documents this for all time if that were really needed.

3. Cumulative health effects. Because of two factors, there is no easily comprehensible way to deal with this data as presented in the EIS. All the numbers are projections, not measurements, and these are currently under challenge by the Heidelberg report and other studies, as well as serious questions about the "safety" of the current standards. Funding for research is so poor that health data on the effects of tritium, for one, do not exist. Constant demands for more research on low level radiation by such people as Dr. Arthur C. Upton of National Cancer Institute have fallen on a deaf Congress, pressured by the nuclear lobby to proceed with the business of profitable operation. In the EIS, the definition of "natural background" clearly reveals the shabby state of

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affairs.

" 'Natural Background' should be interpreted to mean normal Background, including the effects of fallout from past nuclear weapons detonations and the nuclear fuel cycle.."

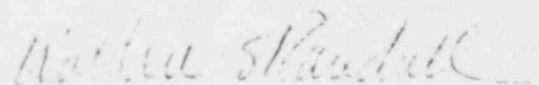
d. 3-15 Sec. 3.1.4.3.

To begin one's measurements of health effects in an already "dirty" system by stating that "dirty" is clean stretches the mind's credulity. Would it not be more valid to assume the approach that BECAUSE irreversible damage had already been done, MORE care and smaller increments are needed to be deposited into the environment? The EIS looks at each proposed increase in environmental load separately, one at a time; speaks of its compliance with the standard as if there was no contaminated bottom line but a bald slate. Ignored are other sources of pollution, other radiation producers such as hospitals, other plants and facilities on the same river. The fact is stated that the river is already out of compliance with safety standards in iron and sulfur content frequently: how does C134 & C137 bind to these constituents? Why does the NRC believe it operates in a vacuum; that the same individual down river whose system is already insulted by a variety of other burdens can without effect absorb more? Based on what thirty year data are such estimates being made? Where are these "funny numbers" coming from? Some disinterested qualified academic center with independent funding or Argonne Laboratories?

The fragile agreement reached by the City of Lancaster with NRC is shredded by an infinity of "if approved" phrases concerning the eventual disposal of the partially filtered water into the river. We will rapidly be drinking huge amounts of Tritium, and other isotopes or pay for our own replacement sources. Chesapeake Bay will be the cesspool of the cleanup by regulation.

This EIS is a depressing illegal parody of the intention of the law which required its development. It is to be hoped it will be summarily rejected by the NRC, and those who developed it removed from the staff. If it is accepted, let the Commission members know that the families of those who live near this plant will someday call them to account for their actions.

Sincerely yours



Walden S. Randall