

Nuclear Regulatory Commission
1717 H. Street, N.W.
Washington, D.C. 20555

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Gentlemen:

Among some of the growing concerns applicable to the restart of Unit I at Three Mile Island (TMI) is the mounting evidence of countless corrections and modifications related to commercial nuclear power plants.

It is little comfort to those of us who must now live in the shadow of an experimental technology which threatens us economically, biologically and morally because the "masterminds" could not or would not follow through on matters vital to the safe construction and operation of this technology nor did they see fit to confer with medical science on biological effects from low-level radiation.

Now, too late, held captive by this malevolent creation, we are confronted with past, present and future malfunctions and human errors that leave us all wandering where the next accident will occur and what the toll shall be.

For months, prior to the melting of two-thirds of Unit II's core, the NRC was given repeated warnings about the valve failures that led TMI operators down one blind corridor after another seeking methods to recover and maintain a water-covered core. Unfortunately, the operators, who had been programmed that this was a fail-safe technology, ignored their instrument readings and specific training instructions and shut off the emergency cooling system...a "no-no" in training procedures. This particular "human error" has been repeated many times at nuclear sites, much to the horror of NRC nuclear engineers.

During the on-going accident, 400,000 gallons of contaminated (radioactive) waste water was released into the river from the turbine building where the accident was causing back-up problems. There was substantial debate between the NRC officials and Karl Abraham about who should take the responsibility for granting permission to dump. The NRC, too cowardly to grant permission, contrived to seduce Gov. Richard Thornburgh into granting the release. But the Governor's Press Secretary, Paul Critchlow would have none of it. Abraham then suggested that perhaps Lt. Gov. Scranton might do the honors. It was resolved by the on-site NRC inspectors in the control room who gave permission to dump the radioactive water. The Dept. of Environmental Resources was notified without even a murmur of dissent from DER officials. No one down river was notified of this criminal action that radioactive water was now flowing toward the water intake that supplies the drinking water for Lancaster Countians.

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The recent bill sponsored by Rep. Walker and approved by the Congress of the U.S. regarding the dumping of radioactive water is misleading and requires clarification. This bill only deals with the processed water which is highly radioactive. However, it fails to address the depositing of residual water, allegedly filter-clean, after processing. This water is contaminated with radioactive tritium and some cesium. (See status reports.) Tritium cannot be filtered from water. Therefore, it is being dumped into the river and is harmful to those who are drinking it. The argument used by the utilities that dilution lessens the harmful effects is nonsense. Dilution is not the solution to pollution.

As the on-site accident began to deteriorate, the NRC spent days debating action on evacuation even ^{though} they recognized the seriousness of the situation. They argued and labored over the phraseology of the memo that would signal evacuation. While the NRC continued to vacillate, local residents proved to be more prudent by quietly taking the initiative and departing in an orderly manner.

Attached to this letter are seventeen independent problems that report a myraid of malfunctions and failures, both human and mechanical, which the NRC has been working on for the past six months. The titles are as follows:

- a) STRESS CORROSION CRACKING IN THICK-WALL, LARGE DIAMETER, STAINLESS STEEL, RECIRCULATION SYSTEM PIPING AT BWR PLANTS.
(October 14, 1982)
SSIN NO.: 6820
IEB 82-03
- b) DEFICIENCIES IN PRIMARY CONTAINMENT ELECTRICAL PENETRATION ASSEMBLIES (December 3, 1982)
SSINS NO.: 6820
OMB NO.: 3150-0094
- c) *RCIC AND HPCI TURBINE EXHAUST CHECK VALVE FAILURES
(July 22, 1982)
SSINS NO.: 6835
IN 82-26
 - * (RCIC) Reactor core isolation cooling
 - * (HPCI) high pressure coolant injection
- d) HYDROGEN EXPLOSION WHILE GRINDING IN THE VICINITY OF DRAINED AND OPEN REACTOR COOLANT SYSTEM
(July 23, 1982)
SSINS NO.: 6835
IN 82-28
- e) CONTROL ROD DRIVE GUIDE TUBE SUPPORT PIN FAILURES AT WESTINGHOUSE PWRs
(July 23, 1982)
SSINS NO.: 6835
IN 82-29

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| f) OVEREXPOSURE OF DIVER DURING WORK IN FUEL STORAGE POOL
July 28, 1982 | SSINS NO.: 6835
IN 82-31 |
| g) CRACKING IN THE UPPER SHELL TO TRANSITION CONE GIRTH WELD
OF A STEAM GENERATOR AT AN OPERATING PRESSURIZED WATER REACTOR
(September 16, 1982) | SSINS NO.: 6835
IN 82-37 |
| h) FAILURE OF SAFETY/RELIEF VALVES TO OPEN AT A BWR
(October 22, 1982) | SSINS NO. 6835
IN 82-41 |
| i) DEFICIENCIES IN LWR AIR FILTRATION VENTILATION SYSTEMS
(November 16, 1982) | SSINS NO.: 6835
IN 82-43 |
| j) (PWR) POWER WATER REACTOR LOW TEMPERATURE OVERPRESSURE
PROTECTION (November 19, 1982) | SSINS NO.: 6835
IN 82-45 |
| k) FAILURES OF AGASTAT OR 0095 RELAY SOCKETS
(December 3, 1982) | SSINS NO.: 6835
IN 82-48 |
| l) MODIFICATION OF SOLID STATE AC UNDERVOLTAGE RELAYS
TYPE ITE-27 (December 20, 1982) | SSINS NO.: 6835
IN 82-50 |
| m) OVEREXPOSURES IN PWR CAVITIES
December 21, 1982) | SSINS NO.: 6835
IN 82-51 |
| n) MAIN TRANSFORMER FAILURES AT THE NORTH ANNA
NUCLEAR POWER STATION | SSINS NO. 6835
IN 82-53 |
| o) SEISMIC QUALIFICATION OF WESTHOUSE AR RELAY WITH LATCH
ATTACHMENTS USED IN WESTINGHOUSE SOLID STATE PROTECTION
SYSTEM (December 28, 1982) | SSINS NO.: 6835
IN 82-55 |

Beyond these problems are:

1. thermal shock: this would fracture the shielding and cause irreversible loss of coolant followed by a melt-down. This would require an immediate evacuation of 150,000 people in a twenty mile radius. NRC's latest figures estimate 56,000 deaths and 90,800 injuries in Central Pennsylvania. (see NRC document enclosure).
2. deteriorating generator tubes whose explosive expansion repair is in doubt and cannot be certified by the NRC at this date. We definitely require an unbiased report from a metallurgist to establish the integrity of the tubes following this procedure. (see enclosed correspondence... letter to Demetrios Basdekas and response from Harold Denton and Wm. Cottrell Oak Ridge National lab.)

3. Met. Ed. has been venting radioactivity into our atmosphere approximately twenty-six days out of thirty-one for many, many months. (see weather reports in the Patriot/Evening News "Venting scheduled for today").

The releases include Krypton gas, Tritium (in form of vapor) Iodine 131, Cesium 137 and particulates (strontium). (see NRC Status Reports for 1982.)

The venting of the 56 thousand curies of krypton gas the first year following the accident was merely a forerunner for more of the same in the future as we knew it would be. The NRC sets new precedents every day. All this is no thanks to the Union of Concerned Scientists who preferred the flaccid approach rather than a resolute one.

4. A week rarely passes now that we do not encounter a telephone call informing us that another neighbor has died from cancer or another who has just been diagnosed with cancer. This is a rural area. Our population levels do not justify this amount of cancer. (see enclosure...ACCIDENT RELEASES

On CBS national news, Dec. 10, 1982, Dr. Robert Weber, the local Vet in this area for the past 35 years, stated that although the health problems have now abated, cancer in animals has tripled. In view of what we know about releases substantial enough to create sunburns on local residents and in some instances blistered mouths that gave the same appearance as sunpoisoning, it reveals releases 100 times higher than officials are willing to admit. Is it any surprise then that cancer rates are spiraling at a quizzical rate.

5. Prior to the accident Goldsboro's population was 600. It is now 360. Many of the original residents would no longer be living in Goldsboro if they could find a buyer for their home. But alas! caution is the better part of valor as any Met Ed. or NRC. employee could tell us.

6. The NRC is now evaluating the question of earthquake and tornado proof structures at TMI. We now know from examining TMI documents that only one building is earthquake proof. That is the control building. (see enclosure).

On February 23, 1973 Lancaster Co. encountered an earthquake. On July 17, 1978 at 2:39 a.m. they encountered a second one. It registered 3.0 on the Richter scale and was sufficient to awaken residents who flooded switchboards. This tremor apparently was above a new underground fault. Although 3.0 is a mild jolt, there is no guarantee that future shocks will not increase in magnitude. The epicenter of these earthquakes reveals that TMI is not the only nuclear plant in jeopardy. Peach Bottom will also become a problem. (see news enclosure with map).

7. The diversities within the NRC where inner-agencies neglect to inform each other as problems arise, has created an administrative nightmare where the left hand never becomes acquainted with the right and the dimensions, of which, have yet to surface in their entirety; hence the TMI accident.
8. The psychological stress generated in this area over TMI is far from groundless. Those who look askance at protesters and noisy assemblies, which have grown to considerable proportions in almost four years, would serve their own best interests by examining, in depth, what many, in this area especially, have discovered. We are not talking about blind fear but rather psychological stress generated out of documented reading from the NRC document room.
9. Realistically we cannot expect the NRC to hang their dirty laundry in the public media for all the world to see. By the NRC's own admissions from their own document room they have failed to make nuclear power "safe", "clean" or "reliable".
10. For all of these reasons we protest the restart of TMI Unit I now or ever.

Sincerely,

Jane Lee
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