

104

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 JUL -9 A8:36

BEFORE THE COMMISSION

SECRETARY'S OFFICE
BRANCH

In the Matter of

METROPOLITAN EDISON COMPANY

DOCKET 50-289

(Three Mile Island Nuclear
Generating Station, Unit 1)

AAMODT COMMENTS CONCERNING COMMISSION DECISION
TO RESTART TMI-UNIT 1

8407090353 840706
PDR ADOCK 050J0289
G PDR

DS03

The Commission order of June 6, 1984 provided the parties with the opportunity to submit comments relative to the Commission's imminent decision concerning restart of TMI-Unit 1 in view of new information. This is the Office of Investigation reports concerning its investigations of numerous management integrity matters and the Appeal Board's recent decision remanding three matters (operator training and two other management integrity matters) to the Licensing Board.

When the Commission relayed this invitation by telephone call last month, we declined the opportunity to participate. We had already expressed our position in filings of April 16, October 27, November 11, 1983 and January 7, February 18 and 24, 1984 as well as personally before the Commission on December 5, 1983. This is that the record and extra-record evidence clearly indicts the licensee of criminal behavior, willful negligence and incompetency. As expressed in our filing of February 18, 1984, the functional policy of the licensee is expediency in order to maximize company profits despite any consequences to the health and safety of the public.

Last month, on June 21, we provided the Commission with new information, in the form of a motion concerning the policy of expediency and deception of the licensee. In the early days of the accident, when the licensee alone monitored the radiation releases, radiation was released on an unwarned public far in excess of that reported. A number of persons, residing within seven miles of the plant, have reported experiences and health effects during the early days of the accident which, taken in total, are clearly the effects of exposure to high radiation. The damage to persons and flora in the

area west of the plant, particularly in the northwest sector (which received the initial plumes for which no in-plant records exist), is severe and alarming.

We allege that the licensee destroyed the in-plant radiation records from which an extrapolation of 40 rems over Goldsborough was made at 7 a.m. March 28, 1979 and falsified the amount of radiation released to the detriment of the health of the residents. We allege that there was considerable release of particulate matter from Unit 2 which was spewed over the area west of the plant, particularly elevated regions to the northwest. We allege that the six-fold increase in cancer in three populations surveyed to the west of the plant is due to particulates that were ingested, inhaled or lodged in the skin of persons not warned to take cover. Damage to flora in the same area was identified by the world's leading expert in radiation effects on plants as possible high dose beta exposure for a twenty-four hour period.

We allege that the lethal particulates from the TMI plant are still on the ground and are still inflicting damage on the unwarned residents of the TMI area. The particulates initiate carcinomas which rapidly terminate the lives of those afflicted. In addition to the 15 persons who have already died in excess of those expected among the 313 member population surveyed, 19 additional tumors have been diagnosed which indicates that the cancer mortality rate will

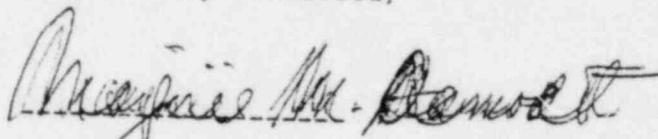
continue to climb.

This matter must take preeminence over all other matters being considered by the Commission in its decision on restart. There can be no restart of Unit 1 if what we say is true.

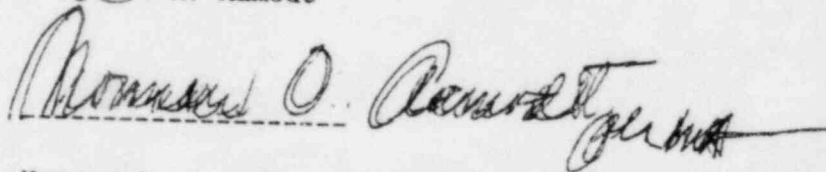
Fourteen days have passed since we filed our motion. We find the Commission's and the Staff's silence incredible in view of the continuing health and safety consequences to the public.

We put the Commission on notice that we consider any delay in responding to our motion to be the most serious dereliction of responsibility. We also notify the Commission that unless it acts immediately to investigate our allegations, we will seek action in a higher court.

Respectfully submitted,



Marjorie M. Aamodt



Norman O. Aamodt

July 5, 1984 - Served on the Commission by Express Mail on this day and on other parties by U. S. Mail, First Class on July 6, 1984.

cc: Docketing & Service
Jack Goldberg, Esq.
Licensing Board Panel
Appeal Board Panel
George Trowbridge, Esq.
Commonwealth of Pennsylvania
Three Mile Island Alert
Union of Concerned Scientists