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August 9, 1984

THREE MILE ISLAND ALERT COMMENTS ON THE  
LONG-TERM ENVIRONMENTAL RADIATION SURVEILLANCE PLAN  
FOR THREE MILE ISLAND JULY 1984

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First of all, thank you for providing us with a copy of the plan and the opportunity to comment. It is important that this plan serve the needs of the people who live in this area.

As laymen it is difficult for us to second guess the EPA on the technical details of this plan. What we have looked for is

1. Whether EPA can provide us with an authoritative objective reading of what is happening at any given time.
2. Whether EPA can provide the public quickly with information to judge whether it is in danger.

We find it disturbing that EPA proposes putting systems on standby just at the time we are entering the most dangerous part of the cleanup. It also concerns us that restoring or increasing monitoring appears to depend upon notification from GPU, either that something dangerous is planned or that some kind of accident has happened. Our experience during the recent headlift has not reassured us.

Despite the announcement that EPA was stepping up its Krypton monitoring during the headlift, the public does not appear to have been given a report, even now, of the exact readings at that time. Nor have we been informed of the amount of Cesium, Strontium, Iodine, or even Plutonium which may have been vented.

This lack of information is particularly worrisome when we were informed that the head was off the reactor for many hours and that during that time the containment building was being freely vented without even the precaution of a misting of the plenum to keep down particulates.

All the public received was the GPU handouts. The media was not even allowed near. The Plan gives this responsibility to EPA. Did the plan work? Were readings taken and reported but never put in the paper or on the air?

The EPA Director is listed as the contact person to get this information and give it to the media. Because he was not available at the headlift, one caller was referred to Birmingham, Alabama for information. Is this the way the Plan would work in an emergency?

Aerial monitoring and plume tracking could not be promised for from two to six hours after notification that something was wrong. This seems to mean 2-6 hours after a Site Emergency is declared. Most of us will not be here then, but for those people who do not know what a Site Emergency is, this seems like a long time for confirmation that a plume is blowing your direction. Do the other monitoring devices provide this information?

Two statements need clarification:  
On page 23 it says, "If concentrations of radionuclides in excess of those permitted in the environment by 10 CFR 20 (etc.) are found outside the controlled area, EPA shall be notified within two hours of discovery. Otherwise, notification shall be made noon of the working day following discovery." What does this mean?

On page 5 it says: "The revised plan provides for increased surveillance if a release is anticipated, or if a release occurs unexpectedly. For example, increased

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Krypton monitoring will be provided during the head lift and, at least initially, during direct manipulation of the core while the pressure vessel is open." Does this refer only to last month's headlift? What does AT LEAST INITIALLY mean in terms of future monitoring of cleanup?

Two or three other suggestions have been made:

No organization seems to monitor uptake of radiation in animals (except cows). Since the study after the accident of voles seemed to be productive, is that a possibility?

Because the plan mentions the 25,00-35,000 curies of  $Kr_{85}$  and 2900-3500 curies of tritium possible in future releases we are apparently being prepared for continuous venting. The plan mentions that releases "will be small and gradual." The NRC itself says, "For radiation protection purposes, the risk of cancer from low doses is assumed to be proportional to the amount of exposure, not the rate at which it is received." Would it be possible for the EPA to give us an ongoing cumulative report of what has been vented of various elements?

*BW*

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