501 Vine Street
Middletown, PA 17057
March 3, 1987

Mr. Michael Masnik
TMI Project Directorate
Office of Nuclear
Reactor Regulation
USNRC
Washington, DC 20555

Dear Mr. Masnik:

The fate of the accident generated water should be tied very closely to concerns of the population and the actual need to dispose of the liquid at this time.

Contrary to some opinions, I believe the competence and integrity of GPU must always be questioned. Why should they be allowed to do anymore then concentrate on the very delicate decon and defuel job at Unit 2? After all the basement of Unit 2 will likely not be completely cleaned until the 21st century. Why have GPU spend its fiscal and worker resources on a 12 million dollar operation never before completed at a civilian reactor site and in particular since there are no medical studies that state GPU's preferred method is safe?

I note the "errata sheet" of the NRC document (NUREG - 0683, Supplement 2) has several computational errors which could relate to human health. A study completed during Krypton 85 venting of 1980 contradicted NRC estimates of human exposure to that "assault" on area residents. Pages A-173 to A-180 of NUREG - 0683 Final Programmatic Environmental Impact Statement Vol. 2 Appendices A - Z March 1981 detail a history that we should certainly consult. This report deals with the venting of Kr 85 and other contaminants from June 28 to July 11, 1980 at TMI 2! Basically the Report says 4 million times the Strontium 90 greater then published predictions was vented which calculated to human life lost due to cancer. The same Nureg discusses annual releases of tritium at 300 curies.

I ask where else has this technique which GPU wants to do as a "public service" been completed and assessed as to the effects on the residents?

Yes, I know Unit 1 is emitting radioactive water and gasses as does Unit 2 but once again I come to competence, trust and integrity. Let GPU concentrate on decon and defuel work.

GPU should use its monitoring and engineering expertise to be sure storage of the contaminated water will remain in tanks on site. I propose GPU spend 2 million dollars for state of the art tanking with reserve capacity. This would allow them to apply the 10 million

dollars. (Forced evaporation costs 12 million) saving to working on the radioactive basement in Unit 2. I believe they will exceed 1 billion dollars on the entire decon/defuel job, so let's not waste 12 million dollars on another experimental system.

Let GPU demonstrate their expertise at monitoring the safe storage of the contaminated water while spending more valuable time, money and worker resources on the serious problem of decon/defuel work inside Unit 2.

With sincerity,

Donald E. Hossler

Donald E. Hossler

DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MARYLAND 21203-1715

REPLY TO ATTENTION OF:

6 February 1987

Planning Division

Mr. William D. Travers, Director
TMI-2 Cleanup Project Directorate
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Travers:

Reference your letter of 29 December 1986, regarding the review of the Draft Supplement 2 to the Programmatic Environmental Impact Statement (PEIS) for disposal of radioactively contaminated water stored at the Three Mile Island Nuclear Station site. The comments provided below address the Corps of Engineers areas of concern, including direct and indirect impacts on Corps of Engineers existing and/or proposed projects, flood control hazard potentials, and permit requirements under Section 404 of the Clean Water Act.

There are no existing or proposed Corps of Engineers projects that would be affected by the work described in the Draft Supplement 2 to the PEIS.

The PEIS should include documentation of the effects on the flood plain and compliance with Federal, State, and local flood plain regulations, as appropriate.

Three Mile Island Nuclear Station, Unit 2, is located entirely within the boundaries of the 500-year flood plain. The PEIS does not address Executive Order (E.O.) 11988, Flood Plain Management, dated 24 May 1977, which is applicable to this review as several of the alternative disposal solutions occur on the flood plain. In accordance with the U.S. Water Resources Council "Flood Plain Management Guidelines For Implementing Executive Order 11988", (43FR 6030), 10 February 1978, the proposed actions may be considered critical such that even a slight chance of flooding would be too great. The document must evaluate alternatives with respect to E.O. 11988 and demonstrate that they have been designed to minimize adverse effects on the flood plain. If the selected alternative is to be located in the flood plain, it must be demonstrated to be the only practicable alternative.

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Each of the 10 alternative disposal methods were reviewed to assess potential impacts on the flood plain. Those alternatives which include total or partial on-site storage and/or treatment at Three Mile Island are subject to flood hazards which could reintroduce the contaminated material into the environment. The alternatives known to be susceptible to flood hazard are:

Alternative #1	Evaporation, solidification of bottoms, disposal at a licensed burial site.
Alternative #2	Evaporation, solidification of bottoms, and retention on-site.
Alternative #6	Permanent onsite storage of solidified waste.
Alternative #8	Long-term discharge into the Susquehanna River.
Alternative #9	Short-term discharge into the Susquehanna River.
Alternative #10	Liquid storage in tanks at the Three Mile Island site.

The risk of flood hazard is minimized by those alternatives which minimize the amount of time materials are stored on-site. The risk of reintroducing hazardous materials into the environment can also be minimized by adopting flood resistant design and construction methods for containers.

The alternatives listed below are not located at Three Mile Island, are not within the Baltimore District, and cannot be judged for susceptibility to flood hazards.

Alternative #3	Off-site evaporation at the U.S. Department of Energy (DOE) Nevada Test Site.
Alternative #4	Deep-well injection at the DOE's Nevada Test Site.
Alternative #5	Crib Disposal at the DOE's site in Hanford, Washington.
Alternative #7	Solidification and disposal at a commercial low-level waste site.

Under Section 404 of the Clean Water Act, Department of the Army authorization is required prior to any discharge of dredged or fill material into waters of the United States, including their associated wetlands. Since the proposed work does not involve work or placement of fill in waters of the United States, Department of the Army authorization is not required.

If there are any questions concerning this matter, feel free to call me or my action officer, Mr. Larry Lower, at (301) 962-4710.

Sincerely,

James O. Johnson

James F. Johnson
Chief, Planning Division

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

FEB 25 1987

Dr. Michael T. Masnik
Acting Director
Three Mile Island-2 Cleanup
Project Directorate
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Masnik:

The Center for Devices and Radiological Health staff has reviewed the Draft Supplement 2 to the Programmatic Environmental Impact Statement related to decontamination and disposal of radioactive waste resulting from the March 28, 1979, accident at the Three Mile Island nuclear station Unit 2 (NUREG 0683, Supplement No. 2, dated December 1986). Our efforts were directed to an evaluation of the public health and safety impacts associated with the proposed alternatives for disposal of water which was contaminated as a result of the accident. We have the following comments to offer:

1. The discussion in Chapter 3 has adequately assessed the alternatives for disposition of the accident-generated water together with the principal environmental impacts for each alternative. It appears that these impacts would involve minimum offsite individual and population dose and occupational dose from releases of tritium, cesium-137 and strontium-90 as a function of the alternative selected.

2. The environmental pathways identified for each alternative covers the possible emission pathways that could impact on the population in the environs of TMI and at potential waste disposal sites. The radiation dose calculation methods and assumptions presented in Appendix B have provided reasonable estimates of the doses to the maximally exposed individual and the population within the 50-mile (80 kilometer) radius of the site. The range of impacts from the alternatives considered are shown in Table 6.1 and indicate that the doses are minimal and well within current radiation protection standards.

3. The discussion in Section 5.2 has adequately assessd the radiological impacts and health effects to the workforce population, the maximally exposed individual, and the offsite population within 50 miles (80 kilometers) from exposure to radioactive effluents. We unequivocally concur with the statement in Section 5.2, page 5.5, paragraph 2, that states "These risks are very small in comparison to cancer incidence from causes unrelated to the disposal of the accident-generated water."

4. Some of the alternatives for disposal of accident-generated waste involve offsite truck shipments. Consequently, it is possible to estimate the number of non-radiological fatalities and injuries that are likely to occur. We agree absolutely with the conclusion in Chapter 6 that the most significant potential impact associated with any disposal alternative is the risk of physical injury as a result of a transportation accident.

Thank you for the opportunity to review and comment on this Programmatic Environmental Impact Statement.

Sincerely yours,

John C. Villforth
Director
Center for Devices and
Radiological Health