



THE ADVISORY PANEL FOR THE DECONTAMINATION OF  
THREE MILE ISLAND UNIT 2

ENCLOSURE

April 16, 1984

Mr. Nunzio J. Palladino  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Chairman Palladino:

During the April 12th meeting of the Advisory Panel on the Cleanup of Unit 2 at Three Mile Island, we again discussed the draft Supplement to the PEIS. The Panel offers the following comments on this document:

- 1) The staff should discuss fully the uncertainties in the cancer (and genetic) risk coefficient used to estimate the potential health effects to the work force associated with the cleanup of TMI-2. This discussion should reflect the range of expert opinion and any recent data that could impact the estimates of the BEIR Committee or other advisory groups or organizations.
- 2) The reported range in the estimated potential health effects to the work force should reflect the uncertainty in the cancer risk coefficient as well as the uncertainty in the radiation exposure to the work force.
- 3) Both the range in potential cancer incidence (morbidity) and fatalities (mortality) should be reported.
- 4) The discussion of the uncertainty in the cancer risk coefficient and its implication regarding potential health effects should be summarized in the front of the EIS and not just contained in the Appendix.
- 5) The staff should further examine the alternative of curtailing cleanup efforts following fuel removal and gross decontamination of the reactor coolant system and reactor building. The PEIS

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states that increased risk to the public could be expected from this scenario. This alternative should be evaluated (quantitatively where possible) with regard to the risk to the public associated with leaving some residual radioactivity on-site and the potential health impact to the workforce. The economic cost of the cleanup and the availability of funding and timing should be evaluated, if possible.

- 6) Cleanup plan alternatives 1 and 2 would result in a delay of fuel removal while resulting in no significant savings in occupational exposure. Because of this delay, and the fact that little or no dose savings will be achieved, alternatives 1 and 2 should not be adopted. I should note that relative to this comment, that of the eight Panel members present, four voted in favor of this item and four abstained. It seems to me that more than four members may agree with this opinion but the members abstaining did so because they did not feel that we should be making a recommendation to the NRC regarding which alternative to follow; it was felt by those abstaining that comments on which alternative to follow should be made after the PEIS Update has been finalized.

In closing I would like to offer the Panel's thanks to the NRC staff and the staff of the utility company for providing the expert people at our two Panel meetings which allowed us to better review the PEIS Update and make our recommendations. Please let me know if you have any questions.

Sincerely,



Arthur E. Morris, Mayor  
Chairman

AEM/dk

cc: Mike Masnik  
Members of the Advisory Panel