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April 14, 1987

Michael T. Masnik
Three Mile Island Cleanup Project Directorate
Office of Nuclear Reactor Regulations
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Masnik:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Comments on Draft Supplement 2 to the
Programmatic Environmental Impact Statement - Three Mile Island Unit 2

The purpose of this letter is to provide additional information, not previously available, for your consideration in development of the Final Supplement 2 to the Programmatic Environmental Impact Statement - Three Mile Island Unit 2 (PEIS). It also responds to previously expressed concerns relative to the potential for release of particulates to the atmosphere during the proposed evaporation process.

GPU Nuclear has received process-specific data concerning the potential for particulate releases during the evaporation process. These data are based on information recently received from the several vendors proposing systems for use at TMI-2. The information indicates that the potential for particulate release, due to the sodium and boron concentrations present in the processed water, ranges from essentially no release to a maximum of 5.3×10^{-6} pounds (3.7×10^{-2} grains) of particulate per dry standard cubic foot of evaporator

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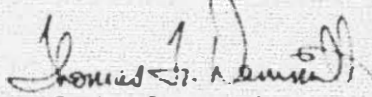
Mr. Masnik

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stack effluent. This is much less than the conservatively estimated 1% maximum particulate carryover previously discussed in the GPU Nuclear environmental statement.

Sincerely,



F. R. Standerfer
Director, TMI-2

FRS/JJB/eml

cc: Director, TMI-2 Cleanup Project Directorate - Dr. W. D. Travers

if checked

Comments on the Draft Supplement to the
Programmatic Environmental Impact Statement
Regarding Disposal of Accident-Generated Water From
Three Mile Island Unit 2

NUREG-0683 Supplement No. 2 says it explores the decontamination and disposal of radioactive waste (water) from the March 28, 1979 accident at TMI. It purports to exhaust the subject, when actually it has overlooked many of the most important considerations.

It does not discuss decontamination other than to say it expects all the accident-generated water to be reprocessed by the SDS and Epicor II systems. The public does not believe that this will decontaminate the water of all transuranics and all but seven elements. I cannot believe that the water has washed the degraded fuel and has shielded the radioactive sludge for years without being loaded with many other dangerous elements which didn't wash out of the system.

I am not sure that the chemicals in the mix are not radioactive. In the 1981 EIS it was stated that "fines" could delay the cleanup. "Fines" were defined as minute particles with a radioactive burden which could not be filtered out of the water. Could some of these particles be chemicals?

There is no assurance that the micro-organisms that grow wildly in the radioactive hot water will be killed before the water is dispersed. Can we be sure that they would not create a health hazard?

While the alternatives have been presented at length, the environmental impacts in the TMI area have been dismissed in many cases with a sentence or two.

For instance, the option to dump the water in the Susquehanna says little about the number of dams downstream which collect silt and could intensify the build-up of any contaminants. It dismisses the impact on the fish which support an enormous industry in the Chesapeake Bay. A privately funded study of the impact of TMI on the Susquehanna by the TMI Health Fund has apparently not been consulted. It would have been a good idea to find out what radioactivity has already done to this river. This could also have included the effects of the Susquehanna and Peach Bottom nuclear plants.

The TMI area lies in a river basin surrounded by hills which trap the air. It is subject to fog and to inversions. This meteorology, coupled with a relatively high density of population has led to restrictions on burning of trash in the area. Yet, there is not one mention of these factors in the EIS.

The draft does not discuss the fact that the prevailing winds carry radioactive water toward one group of people more often than not. The population on the hillside, on an elevation even with the top of the stacks, downwind, already feels it has suffered severe health effects from the accident and clean-up. Air dispersal would impact these people more than others.

Important to all of us is the fact that any dispersal of this radioactive water is just that much more radioactivity, when we have already had enough. No-one has given us an accounting of how much radioactivity we got from the accident, from venting, and from cleanup, not to mention the operation of Unit 1 before and after the accident. This EIS does not do that either.

The draft talks about inconsequential effects of radiation on the one hand and fatalities from cancer or traffic accidents on the other. Where is the discussion of cancer incidence, genetic effects, or increased susceptibility to chronic diseases?

Except for the effects of drinking the water, little is said about the disproportionate effect of radiation on the fetus or the developing child.

Most importantly, none of the alternatives presented actually disposes of the radioactive water. Real disposal would effectively isolate the radioactivity from the biosphere. All the alternatives in this draft except for the No-Action alternative effectively disperse the radioactivity rather than isolate it.

This is truly ironic because apparently the main reason the NRC has presented an EIS is to satisfy the TMI public which objects to any more radioactivity being dispersed into its environment.

Why is the alternative presented in this draft which seems to do all the right things for the public rejected?

The No-Action Alternative of Liquid Storage in Tanks On-Site:

1. Does not pollute the downstream water supplies
2. Does not force the public to breathe radioactive vapor
3. Could cost as little as zero dollars
4. Would not create additional occupational exposure
5. Would have no significant exposure pathways to the public other than from accidents (which the draft minimizes)
6. Would require no additional land commitment
7. Would take no transportation risks.

How can the NRC say "no?" The only explanation given is that the NRC feels it merely defers disposal. The people around TMI do not want to see this alternative dismissed with a word like "merely."

1. It would allow most of the stated radionuclides to have passed through 10 half-lives, to have practically disappeared by disintegration.

2. It would allow Strontium-90 (28.5 years) and Cesium-137 (30.2 years) to have disintegrated through one full half-life.
3. It would allow a whole generation which has experienced the accident, the venting and the cleanup to age without more irradiation.

Only two reasons are given by the NRC for not considering this option.

1. The NRC has made a policy decision not to make TMI a nuclear waste dump. The public applauds this decision. Unfortunately it is not entirely honest because no-one plans to dismantle and carry off the present plants nor to abolish the pool of used fuel rods. So why would the NRC worry about a little radioactive water which they do not consider dangerous?
2. It creates an administrative problem for the NRC by putting off a "final" decision, perhaps beyond the date of the license expiration.

I believe that the NRC simply wants to make the water "disappear" so that 30 years from now the public will not be reminded that the accident happened and it didn't go away.

Whatever scientific evidence is presented in this draft I believe is essentially irrelevant. What we are commenting on is public policy.

Deliberately dumping nuclear wastes on the public in any quantity is bad public policy in a democracy. Dumping them on a public which has already been traumatized and had its health endangered by a nuclear accident is completely unacceptable.

I urge the NRC to reconsider - to contain the water, not disperse it - at TMI or anywhere else.

- Beverley Davis
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