



M. I. Lewis  
6504 Bradford Ter.  
Phila PA 19149  
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DOCKET #50-289.

IN THE MATTER OF TMI#1 CLOSING,  
ADDITIONAL CONTENTIONS.

I HAD PREVIOUSLY ASKED IN MY PRIOR SUBMITTALS THAT CONTENTIONS BE LEFT OPEN WHERE THEY INVOLVE THE HEALTH AND SAFETY OF THE PUBLIC. I WISH TO ADD A CONTENTION WHICH DOES IMPINGE AND INVOLVE THE HEALTH AND SAFETY OF THE PUBLIC STRONGLY.

I CONTEND THAT THE WAY THE RADIOACTIVE WASTE IS HANDLED, TRANSPORTED, STORED, AND MANAGED AT TMI PRESENTS AN IMMEDIATE, ONGOING, AND SERIOUS DANGER TO THE HEALTH & SAFETY OF THE PUBLIC.

THERE ARE SEVERAL REASONS - BOTH GOOD AND BAD - THAT I HAD NOT RAISED A CONTENTION CONCERNING RADWASTE.

- A - I WAS HOPING THAT ANY OF THE OTHER PETITIONERS WOULD RAISE RADWASTE MANAGEMENT AS A CONTENTION. UNHAPPILY, I HAVE NOT SEEN THIS IN THE DRAFT CONTENTIONS.
- B - I WAS HOPING THAT THE RADWASTE MANAGEMENT WOULD IMPROVE WITHIN NRC AND AT TMI & DOE. INSTEAD, I FIND THAT THE RADWASTE QUESTIONS GROW AND GROW. SEVERAL GOVERNORS HAVE DISALLOWED RADWASTE TRANSPORTATION THRU THEIR STATES. DR DIXIE LEE RAY HAS CLOSED THE LAST LOW LEVEL WASTE SITE ~~FOR~~ COMMERCIAL ~~LOW~~ LOW LEVEL WASTE DUMPING. THIS MEANS THAT LOW LEVEL WASTE MUST BE STORED ON SITE PERHAPS PERMANENT.
- C - THE RADWASTE MANAGEMENT AT TMI#2 WHERE IT IMPINGES ON TMI#1 IS EVEN MORE IN JEOPARDY.

CONTINUED.

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C. (CONTINUED) THE RADWASTE MANAGEMENT AT TMI#2 IMPINGES ON TMI#1 SPECIFICALLY AND ESPECIALLY IN THAT THE TANKS AT TMI#1 WILL HAVE TO BE USED FOR AN EMERGENCY DUMP FROM TMI#2 WHEN THE WATER LEVEL IN TMI#2 GOES OVER 8' IN THE CONTAINMENT STRUCTURE. THIS BECOMES A RADWASTE MANAGEMENT PROBLEM SINCE THE TANKS AT TMI#1 WILL BE CONTAMINATED WITH RADIOACTIVE WATER FROM TMI#2. THIS MANAGEMENT PROBLEM PRECLUDES THE STARTUP OF TMI#1.

CHMN. HENDRIE TO TMI SENATE SUBCOMMITTEE (SEN. HART, CHMN.)  
 "WHATEVER STEPS NECESSARY WILL BE TAKEN. IF THAT MEANS UNIT -1 TANKAGE, THAT IS WHAT IT MEANS." ... "HE (DICKAMP?) CAN SUE US FOR YEARS BUT IN THE MEANTIME, HE WILL DO AS WE (NRC?) TELL HIM."

THIS IS A STATEMENT OF CHMN. HENDRIE IN FRONT OF THE TMI SENATE SUBCOMMITTEE. THIS STATEMENT NOT ONLY DESCRIBES A CLEARLY DANGEROUS RADWASTE MANAGEMENT PROBLEM, BUT ALSO PRESCRIBES A ~~STATE~~ MANDATE TO KEEP TMI#1 TANKS AVAILABLE FOR AN EMERGENCY DUMP FROM TMI#2. TO KEEP THE TANKS AT TMI#1 AVAILABLE FOR AN EMERGENCY DUMP FROM TMI#2 REQUIRES THAT TMI#1 NOT BE RESTARTED. RESTARTING TMI#1 WOULD REQUIRE THAT TMI#1 TANKS BE AVAILABLE FOR TMI#1 NEEDS. THESE TMI#1 TANKS COULD NOT BE AVAILABLE FOR TMI#2 EMERGENCIES IF TMI#1 IS ALLOWED TO RESTART.

D. I HAVE ATTEMPTED TO SURVEY THE EFFORTS AT DOE, NRC, EPA, etc to determine if any progress was forthcoming. INSTEAD, I HAVE FOUND THE OPPOSITE TO BE TRUE.

- (1.) NOTICES ARE SENT OUT LATE. DOE, NRC meeting ON OCT 4 NOTICE WAS RECEIVED BY ME ON OCT 10, '79.
- (2.) DESPITE INCREASING "INCIDENTS" DURING TRANSPORTATION AND OPERATION AND QUESTIONS ABOUT GEOLOGIC DISPOSAL, NOBODY SEEMS TO BE SAYING GO SLOW UNTIL WE HAVE RADWASTE PROBLEMS PRETTY WELL ALONG. CONSIDERING THE LARGE AND GROWING INVENTORY OF HIGH, INTERMEDIATE, LOW, TRU, SOLID & LIQUID RADWASTE ON THE TMI SITE, THE NRC IS ~~IGNORING THE~~ ~~PROBLEM OF GETTING~~ ~~THESE WASTES OFFSITE AND INTO LONGTERM~~ ~~OR PERMANENT REPOSITORIES WITHOUT ENDANGERING~~ ~~THE HEALTH AND SAFETY OF THE PUBLIC.~~ ~~(NOT BE CONCERNED WITH THESE)~~ FURTHER, THERE IS NO WAY NOW TO KNOW WHAT THE FINAL VOLUME OF RADWASTE WILL BE. THE FINAL NUMBER OF RADWASTE CURIES IS EQUALLY IN DOUBT. I RAISED A POINT IN DOCKET 450-3 THAT UNFORESEEN CIRCUMSTANCES CAN INUNDATE THE DESIGNED CAPACITY OF ANY RADWASTE SYSTEM. THERE IS ~~NO~~ REASON TO BELIEVE THAT THE GROWING INVENTORY AT TMI WILL EVENTUALLY OVERCOME THE CAPACITY OF THE RADWASTE DISPOSAL NON-SYSTEM WHICH WE STILL HAVE NOT EVEN YET DESIGNED!

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