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501 Vine Street  
Middletown, PA 17057



Mr. Samuel J. Chilk, Secretary  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Chilk:

I am of the opinion that an ENO should be declared in this area. If my reasons, listed below, are not sufficient I would suggest establishing criteria which additionally more closely aligns with psychological stresses related to nuclear accidents.

1. Inadequate monitoring of radiation releases is documented. Evidence supports that releases were in thousands of rems, when measured.
  - A. One half of the portable monitors were inoperable.
  - B. A utility detection crew was delayed in traffic, while attempting to go to the West Shore of the Susquehanna on March 28.
  - C. Wind patterns were stagnant over the East Coast, but shifting in our area.
  - D. Radiation checks may not have been completed when radiation was at its peak.
  - E. Body scans were only done to 700 citizens and then only one per family.
2. A Mr. Gibson, of the NRC, said on June 21 to the NRC Commissioners that we will never know what was released.
3. 1,000 rems per hour was measured on site. Off-site determinations are difficult because of #1 above.
4. Victor Stello, of the NRC, was reported by the media on Aug. 6 as saying that if NRC officials knew on March 28 what they know now they would have called for an evacuation earlier.
5. We are living with an accident still in progress. Anxiety is very high. Threats of further water and radiation releases are constant. The clean-up will result in further problems.

As a private citizen, I am thoroughly frustrated. Why must we continue to endure the plain fact that authority figures are placing economics before individuals interests. Who really controls our society? I still have a faint glimmer that we the people can and will make a difference.

Sincerely,

Acknowledged by card. 8/31/79

Donald E. Hossler

7910260179

Measuring Gauges 'All Went Off Scale,' NRC Told

# 'We'll Never Know' N-Dose

6/22/79  
Patrol

Washington Post News Service

WASHINGTON — The Nuclear Regulatory Commission was told Thursday that it will never know how much radiation escaped from the plant at Three Mile Island because the levels exceeded the abilities of the plant instruments to measure them.

"All the radiation monitors in the vent stack where as much as 80 percent of the radiation escaped went off scale the morning of the accident," the NRC's Albert Gibson told the five NRC commissioners Thursday. "The trouble with these

monitors is they were never contemplated for use in monitoring accidents like Three Mile Island."

"So we don't really know what went up there?" NRC Commissioner Victor Gilinsky asked. "Up through the vent stack?"

"That's correct," replied Gibson.

Gibson told the five commissioners that radiation readings inside the auxiliary building were "extremely high" at all three levels inside the building, forcing an evacuation of the building the morning of the accident.

"The radiation monitors were all off scale," Gibson said. "One set of readings were greater than 1,000 rems per hour. We don't know how much greater because the license didn't have instruments that measured more than 1,000."

The maximum allowable exposure the NRC allows nuclear plant workers is five rems per year, less than 1 percent of the hourly radiation concentrations being found inside the auxiliary building the morning of the accident.

There are three radiation monitors in the vent stack, Gibson said, and another five monitors in the pathways leading to the stack. All eight instruments read the highest radiation levels they could read during the accident, which released airborne radiation for three straight days starting March 28.

Gibson said that an average of 10 measurements were made on Three Mile Island and within a three-mile radius of Three Mile Island each day that radiation was released, often when the wind was shifting or when escaping radiation was not at its peak.

On the day of the accident,

365 millirems of beta and gamma rays per hour were measured at ground level 1,000 feet from the vent stack. Directly over the vent stack, a helicopter measured levels three times that. Both those measurements triggered emergency announcements, leading Pennsylvania Gov. Richard Thornburgh to advise pregnant women and pre-school children in a five-mile radius of the plant to stay indoors.

"Those measurements were very inconclusive," Gibson told the NRC. "All they will show

will be dose rates at the moments the measurements were made and without knowing the precise weather patterns we don't know if they were made at the appropriate locations."

Gibson said that most of the radiation that escaped through the vent stack escaped through open relief valves and leaking pipes and valves. Until Thursday, the NRC had thought most of the escaped radiation was gas that had bubbled out of contaminated water on the floor of the auxiliary building alongside the reactor.

-PE has no plans to build a plant in the foreseeable future; its 1978 Annual Report states flatly on page 5 "Long range plans to build two nuclear units at Fulton were cancelled"(although they have been saying quite the contrary to the NRC).

-Early Site Review presupposes the construction of a nuclear plant at a specific site and violates the terms of the National Environmental Policy Act requiring a utility to assess alternate means of meeting its service area's requirements for power including conservation practices and other ways of generating power.

-and since the NRC may decline to initiate early site review in cases where there are objections from "cognizant state and local government agencies", Save Solanco obliged the NRC by submitting statements of opposition to the Fulton project along with its petition from

Peach Bottom Township, York County(directly across the Susquehanna)  
Fulton, Drumore & Martic Townships, Lancaster County(the plant site)  
State Rep. Gibson Armstrong(State Rep. of the area)  
State Sen. Ralph Hess (State Sen. of the area)  
Pennsylvania Office of Consumer Advocate(not in the ratepayers' interest)  
US Rep. Robert Walker(US Rep. of the area)  
US Sen. Richard Schweiker(US Sen. of the area)  
Lancaster County Planning Commission & Board of Commissioners

No state or local governing agencies were recorded as favoring the project.

Predictably, PE countered by saying ESR was perfectly valid and it was "premature" for agencies to oppose. The NRC Staff, which we have seen from past experience as being in the hip pocket of the nuclear industry, sided with Philadelphia Electric in opposing SSE's petition and indicated that not only a detailed review of PE's ESR application not been made, not even an acceptance review has been completed (seven months after application was made!).

It appears the NRC Staff with its tilt toward utilities seeks to drag out the process indefinitely so as not to let PE get locked into a six year ESR validity period and then having its construction license application terminated since justification for building this nuke still may not be made. Save Solanco is in the process of submitting additional contentions and rebuttals to move this matter along. To be continued.....

(Nor can it be said by nuclear proponents that we are employing "delaying tactics" and thereby hindering the progress of commercial nuclear power. - Editor)

#### THE CONTINUING ACCIDENT AT THREE MILE ISLAND

With TMI-1 shut down by the NRC until further notice, attention this past month shifted back to the continuing accident at unit 2. Cooling water required to keep the un-scrummed portion of the reactor core from heating out of control, gets radioactive in the process, and has been accumulating at the rate of 1/2 inch weekly in the containment structure, where it now stands at roughly seven feet. If it gets beyond 8 1/2 feet, speculation has it that it will interfere with radiation and other sensing equipment which will cause more problems.

300,000 gallons are said to have accumulated in the containment, with another 100,000 gallons in the reactor and associated piping and 300,000 gallons of water of lesser radioactivity in an auxiliary building.

Threatened with a restraining order by the city of Lancaster and the Susquehanna Valley Alliance citizens group, the NRC and Met Ed agreed not to dump any radioactive water in the Susquehanna River pending an "environmental assessment" of various disposal alternatives. A draft of this "assessment" was released for public comment during the week of June 18, with the final draft to be issued in the fall.

Meanwhile Met Ed contracted with Chem Nuclear Systems Inc., to design and build a processing system designated as Epicer 2 in violation of the agreement to await outcome of the final environmental impact assessment. Epicer 2 can process 10,000 gallons a day by de-mineralizing water with contamination levels up to 40 microcuries/milliliter of cesium 137.

Source: Nucleonics Week, 6/21/79

(Cesium 137 is a gamma emitter with a half life of 30 years and like all gamma emitters attacks muscle tissues and reproductive organs which can result in birth defects, mutations and miscarriages. Any de-mineralization or filtering process will still allow tritium, a radioactive isotope of hydrogen which is part of water itself, to remain. The other, and more expensive option, is boiling the water away, and combine the radioactive residue with resins to be hauled away and buried, thereby eliminating the need to dump any water into the river.)

Meanwhile the NRC <sup>assumed</sup> that 21 times more radioactive xenon-133 gas was released to the atmosphere than might have been expected from the accident. This

disclosure was contained in a May 9 memo from D. F. Bunch, NRC Office of Nuclear Reactor Regulation, which concluded that methods used by the NRC for the past ten years in calculating radiation releases and the suitability of sites for nuclear plants might be in error. Source: Lancaster Intell, 7/20/79  
(Xenon-133, a gamma and beta emitter with a half life of 5.3 days can result in lung cancer if inhaled.)

Subsequently, it was learned that not only is there roughly 900,000 gallons of radioactive water but an estimated 60,000 curies of krypton-85 (like xenon-133 but with a half-life of 10 years). The safest, but again the most expensive method of disposal is pumping it into steel tanks in the form of liquid hydrogen, while the cheapest is venting it to the atmosphere. Source: Lancaster Intell, 7/26/79  
(Guess which method Hot Ed prefers. - Editor)

All of this contributes to the continuing controversy over the health effects of low level radiation. Many are calmed by NRC and other "official" statements that all radioactive releases will be within federal limits and therefore "pose no health risk to the public" but the controversy concerning the extent of these "limits" and the health effects of even the smallest addition of radioactivity to the environment continues.

At least 5 out of 18 members, but less than a majority, of the National Academy of Science committee studying the biological effects of ionizing radiation (BEIR) subscribe to the "linear" rather than the "threshold" theory. The latter sees no radiation effect below a certain "threshold" around which current federal radiation standards are set. The "linear" theory sees a direct relationship between radioactivity introduced into the environment and the resulting health effects- a ten-fold increase in radioactivity results in a ten-fold increase in the incidence of cancer.

Source: NY Times, 7/2/79

Adding fuel to the fire is that on or about July 26, 4000 gallons of water presumed to be radioactive and accidentally not tested for strontium-90 (a beta emitter with a half-life of 28 years known to cause bone cancer and leukemia) was released from TMI unit 1. The story was tipped to the Associated Press by Margo Grubb of Limerick Ecology Action, an ECNP member group who learned of it from Karl Abraham, NRC Public Information Officer at King of Prussia, Pa. Local government officials and Pennsylvania's Bureau of Radiation Protection were apparently in the dark which illustrates the continuing lack of communications fueling public suspicion of both the US Nuclear Regulatory Commission and Metropolitan Edison. Source: Lancaster Intell, 7/31/79

US Rep. Robert Walker of Lancaster County immediately wrote NRC Chairman Hendrie calling for the permanent lifting of GPU's license at TMI saying "this blatant action constitutes gross irresponsibility with regard to the public interest and the environment." He followed this with a letter to the US Attorney General urging prosecution of GPU "to the fullest extent of the law" if US District Judge Oliver Gasch believes the utility violated the court order resulting from Lancaster City's suit.

Source: Lancaster Intell, 8/1/79

In what may bode ill for residents in the area are these comments from Tom Gerusky, director of Pennsylvania's Bureau of Radiation Protection: "There are going to be announcements like this for the next couple of years. We are going to be living with a TMI cleaning process for two or three years. We are going to have problems. There are going to be releases to the environment and there is a possibility of minor spills and major spills. Source: Lancaster Intell, 7/23/79  
(So much for clean, safe nuclear power! -Editor)

#### QUOTABLE QUOTES

"A nuclear plant can either produce electricity cheaply or safely, but not both."

-Mark Widdoff, former Penna Consumer Advocate  
June 28, 1979 speech at PC College, Lancaster  
Source: Lancaster Intell, 6/29/79

"Nuclear power is only a short-term answer to America's energy needs. I don't think the nuclear field is the growth industry it was. The excitement of a burgeoning new technology isn't there."

-Dr. Harold Denton, Dir, NRC Office of Reactor Safety, in remarks during a dinner conversation with US Rep. Robert Walker in Lancaster, 6/22/79  
Source: Lancaster Intell, 6/23/79

#### PHILADELPHIA ELECTRIC SPEAKS WITH FORKED TONGUE

"In spite of anticipated cost increases for both nuclear and fossil-fueled generating systems, the economic advantages of nuclear powered units is expected to continue. Experience with Philadelphia Electric's Peach Bottom nuclear power station strongly supports this conclusion" says Vince Boyer, PE vice-president, Engineering & Research, June 1979. Source: Electric Power Generation Economics, PE Brochure 12079-878