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November 18, 1980

Dr. Bernard J. Snyder, Director
Three Mile Island Program Office
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Snyder:

I am writing to express my comments on the "Draft Programmatic Environmental Impact Statement (related to decontamination and disposal of radioactive wastes resulting from March 28, 1979 accident Three Mile Island Nuclear Station, Unit 2, -NUREG-0683)". At this time, I wish to thank you for mailing me this draft for my review and comment.

First, I would like to express my comments concerning the structure and general presentation of the report as follows:

1. One of the basic purposes of the PEIS is to inform and involve the public as well as government officials in the decision making process of the Commission. The PEIS staff has utterly failed to effectively draft a statement which would allow the public to rationally and comprehensively participate on the subject of decontamination and disposal of radioactive wastes concerned at Three Mile Island or any nuclear facility. The staff has categorically demonstrated through this report a lack of ability to properly convey and inform the public as to a clear understanding of the subject. It is not that the public lacks the intelligence or desire to comprehend, but that the staff has failed to organize and present that material in an educatable manner.
2. The material presented must be placed into its correct perspective of its significance to other releases to the environment with respect to industrial, other energy producers releases, non-industrial, and background.
3. Since the accident, the role the NRC has assumed in involving and informing the public in the decision making process has not served the residents in gaining greater confidence, credibility in the nuclear industry. But, rather, has consistently served those of the negative minority at the expense of time, of the majority the utility, and the nuclear industry.

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3. The facade of neutrality has long since been lost through your lack of leadership and has become in essence a politically tax funded organization, which I feel should be totally abolished by Congress. If you are to establish a positive rationale, then you soundly educate the public and allow those members of the majority to be represented on the same basis as those of the negative attitude.
4. The organization of the report is often confused and constantly interrupted with "refer back to" or "see appendix" for further reference. The arrangement and discussion of subject material in the present order is not constructively set up for logical understanding. At least four or five chapters should be arranged as to order in the total presentation.

Next, I would like to express my views concerning material in the report as follows:

1. In the first chapter, the staff stated that commercial nuclear power plants are not designed with special consideration for large scale decontamination operations. This statement represents the total inability of the NRC to provide leadership in plant safety and design. Quite frankly, I believe the commercial industry would have been far better to regulate itself as to design, safety, and training of its staff than to be engulfed in bureaucratic strangulation and total inability to lead and set standards and educate those concerned with this industry. These efforts, or lack of, have only served to undermine public confidence, severely attack the credibility of the nuclear industry and the utility in question.
2. The major environmental impact of the cleanup at GHI is the occupational doses received by the workers involved. This is not presented in a clear and concise manner to the public in relation to the workers and the best alternatives for them. To demonstrate your fairness and neutrality, you should have a representation from this work force to allow their views to be presented and advise considered. Yet you have consistently ignored the workers, and the public, and taken under advisement those views from areas that are the most vocal, and threatening, and technically lacking in expertise on the matter.
3. I would like to comment on the repetitive mentioning of the failure of the HEPA filters and its possible release of radioactive effluents to the environment. As of the writing of the PSIS, much of the Auxiliary and Fuel Handling Buildings have been decontaminated, yet, the report does not illustrate the actuality of the failure of these filters and their releases during this operation.

3. To promote public confidence, the staff should illustrate what these filters are, their purpose, placement in the buildings involved, failure under normal operations, failure and resultant releases involved during the operation of decontamination involved in the Auxiliary and Fuel Handling Buildings. Then the reader can realistically place this possibility in its true prospective and relationship to the cleanup effort.
4. To give credence, by disclosure, of such ideas as pouring cement into the containment building to solidify the water in containment, only serves to enhance your lack of expertise and seriously impairs your ability to lead and regulate. I feel the public should be grateful that the staff could not find a way to insert a slurry into the building and give us a permanent problem. With the additional time the staff required to prepare this draft, it seems to me that the staff desperately grabbed at all ideas, the more the better, to enhance the facade that YOUA NAC IS ON THE JOB AND CAN OUTDO THE INDUSTRY. The licensee has demonstrated its expertise through its presentations, carefully studied and researched. This presentation of a quantity of alternatives against the licensee's presentation only serves to confuse the public and demonstrate your success in using paper not intelligence.
5. We simply do not have an eternity to clean up the plant and to delay this effort for the presentation of your studies, and reports places the citizen in a situation of severe financial burden and a attitude of endless frustration. In over eighteen months you have only succeeded in raising the costs, increasing the damage, and increasing the risks of safety and health to the general public.
6. If the alternatives presented will result in little or insignificant impact environmentally to the public; then you should demonstrate this in the context of other releases or pollutants in the environment. To say that this is not within your area of demonstration; then this report should have been compiled in conjunction with the proper agencies concerned with the total environment and perhaps taken the total responsibility from your agency.
7. I have far greater confidence in proposals presented by the licensee, such as the SDS system, especially since their proven performance in designing the venting of Krypton-85 gas and its successful completion.

8. The attitude of neutrality which you have tried to relate to the public concerning decontamination at TMI is totally discredited through the selection of individuals to sit on the TMI ADVISORY PANEL. If you wish to be fair and have representation for the minority, then you must have the majority represented. By ignoring, refusing to appoint members or individuals of groups representing the majority, you cannot consider this a fair and equal representation. The official credence of the negative attitude further corrodes public confidence in your efforts.

I hope my comments will constructively aide you and your staff in preparation of the final report. My purpose is simply to help you effect a better and fairer relationship with the public, and creating a positive atmosphere concerning the decontamination effort at TMI and the nuclear industry. As a resident of Pennsylvania, I strongly feel that this situation must be placed into a realistic prospective, so that an expediously safe and clean effort can proceed and the unit returned to operation. If I can be of any further assistance, please do not hesitate to contact me.

Thanking you in advance for your consideration in this matter.

Yours truly,

Mrs. Patricia A. Books

PAB/pab

cc: Mr. Ed Helminski
Mr. Matthew Bills
Mr. Allen Ertel
Mr. John P. Ahearne