

BOOKING NUMBER
PROD. & UTIL. FAC. 50-320

United States Senate

April 14, 1981

RE: Irwin D. J. Bross

Respectfully referred to:

Office of Congressional Relations
Nuclear Regulatory Commission
Washington, D.C.



Because of the desire of this office to be responsive to all inquiries and communications, your consideration of the attached is requested. Your findings and views, in duplicate form, along with return of the enclosure, will be appreciated by

Charles E. Wright, Jr.
U.S.S.

REPLY: Libby Cartwright 358 RSOB

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John D. J. Gross, Ph.D.
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Ralph W. Park Memorial Institute
115 Elm Street
Buffalo, N.Y. 14263

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No opinions have been expressed and should be considered as reflecting official positions of the administration of
Ralph W. Park Memorial Institute or of the N.Y. State Health Department.

March 31, 1981

Senator Charles Mathias Jr.
United States Senate
Washington, D.C. 20510

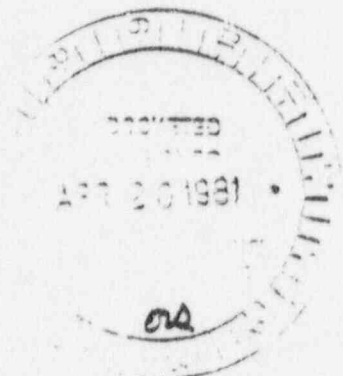
Dear Senator Mathias:

On the basis of new scientific data that became available on March 17, 1981, it now appears that the Nuclear Regulatory Commission (NRC) plans for the clean-up of the damaged reactor at Three Mile Island (TMI-2) will be extremely hazardous both to the workers and to the general public.

The new data comes from a follow-up study of nuclear submarine workers by the National Institutes of Occupational Safety and Health (NIOSH) that was discussed at a day-long meeting of the scientific advisory committee on this study in Cincinnati, Ohio, on March 17. The data show a doubled risk of lung cancer among nuclear workers receiving more than one rem lifetime exposure (and, in almost all cases, less than the NRC permissible doses).

Applying the new estimate of lung cancer risks, 12 lung cancer deaths per 1000 person-rem, to the NRC exposure estimate of 8000 person-rem gives an estimated $12 \times 8 = 96$ lung cancer deaths among TMI-2 clean-up workers (as compared to NRC estimates of less than one death from all causes). In addition to lung cancer, the new NIOSH data shows a broad spectrum of radiation effects which NRC estimates ignore.

The hundreds of deaths and disabilities among workers and the public that would be caused by the proposed clean-up of TMI-2 with the NRC plan can be largely avoided in a simple way. Instead of moving radioactivity out of the TMI-2 containment or putting workers into hot areas, the radioactivity can be immobilized in concrete by a remote-controlled entombment process. This common-sense solution would cost the shareholders or ratepayers or taxpayers or whoever picks up the tab about one-tenth as much as the NRC plan and would be safe for hundreds of years. Unfortunately, it does not satisfy NRC regulations and NRC refuses to consider it.



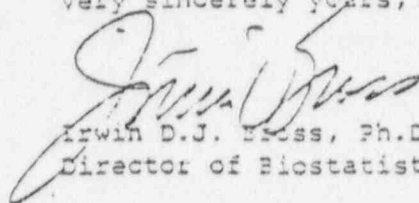
Dr. Charles Mathias Jr.

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The reason for NRC insistence on a clean-up plan which will unnecessarily expose many persons to TMI-2 radiation is that NRC is using obsolete and erroneous risk estimates that indicate the plan is "safe". These same estimates had indicated that the radiation doses shipyard workers were exposed to during 1959-1962 were "safe." Unfortunately, 15 years later (1973-1977) the workers were dying of lung cancer and other causes from these "safe" doses. How much longer must we go on killing human beings merely because NRC absolutely refuses to face the new scientific facts about the health hazards of low-level ionizing radiation?

Very sincerely yours,


Irwin D.J. Bross, Ph.D.
Director of Biostatistics

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