



August 26, 1996

Shirley Jackson, Ph.D.
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Jackson:

As field director of the Citizens' Monitoring Network, I have been asked to write to you to formally request that the Maine Yankee Atomic Power Plant be required to install on-line, continuous, automated gaseous and liquid effluent monitoring systems at the source (before they leave the plant). In 1991, as a state legislator, I submitted a bill to the legislature which would have required such systems. Maine Yankee was opposed to the bill. The state officials who are in charge of monitoring and whose salaries are paid by Maine Yankee were opposed as well, but helped in getting real-time pole monitors established in the one-mile radius around the plant. As the gaseous stack is 170 or so feet up, we always felt we needed monitors farther out as well. The state nuclear inspector at the plant has said as much.

The state of Illinois has the kind of system which we are asking you to require. It seems to us that, especially as nuclear plants are ageing, such a system would be prudent for all of them. We say that in spite of the fact that Three Mile Island was a new plant when it experienced the accident and that during the first years of Maine Yankee's operation there were large releases because of faulty fuel and perhaps inexperienced operators. I am sending you a copy of testimony written for a state senator in New Hampshire in 1991 by Ron Earl of Science Applications International Corporation, a producer of such a system at that time.

In 1993 the state of Maine hired ChanTech, Inc. to evaluate the performance and effectiveness of the environmental radiation monitoring system at Maine Yankee Atomic Power Station. In its report's recommendations are these words: "It may be most appropriate to consider improving the stack monitoring systems since they are measuring, in an active role, the actual effluent activity concentrations released to the public." Our state nuclear safety inspector, Patrick Dostie, has himself said that extrapolations of releases from sampling involves a certain "leap of faith".

As you are aware, Maine Yankee has been experiencing problems that do not encourage public trust, even among many of those who think nuclear power is a clean and safe source of power. Mainers who live near the plant, except for those in Wiscasset who get property tax benefits,

have historically been opposed to its operation. Three citizen referenda have been before Maine voters to shut the plant down. Each time the nuclear industry has mustered more than five million dollars to defeat the referenda whose supporters were able to raise something like a half a million dollars from ordinary citizens. Nevertheless, the "shutdown" vote has ranged from 45% to 40% statewide. So, the base of support among those who are most aware of the frequent problems and shutdowns of Maine Yankee is weak. Other Mainers who are not often aware of those disconcerting events are not necessarily very strong in their support.

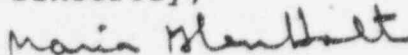
Our citizens' network has been in operation since 1979. I am sending you our 1988 report. We are about to put together another report of our records correlated with those emissions reports made public by Maine Yankee (as the Maine law requires). Since 1991 the network has been expanded by public law which provided Geiger rate meters to more people than we could provide ourselves. As we expected, we have rarely experienced alarms on our monitors. (And of course, a few alarms were caused by people who had undergone radiation diagnostic treatments.) Our original citizen monitors are set to alarm at ten times background. The state monitors provided for citizens are set to alarm at two times background.

Our purpose in 1979 was to avoid the Three Mile Island situation in which people were not told of possible and/or actual rising ambient radiation levels for two days. Nevertheless, we have found, and still find, very interesting correlations without any accidents which the government would call serious enough to warrant warning the public. We have also learned a great deal about natural background radiation. In the nuclear age, this is important.

We want you to know that we thank you for your vigilance in dealing with Maine Yankee's problems. Also, you should know that our group was started by physicists, electrical engineers, health physicists, public health nurses and many others who are well-educated and not "phobic" about nuclear power. We know there are safer, more efficient sources of electricity that need investment by industry with the blessing and support of a forward-looking government.

Our second eight-year report will be sent to you early next year. For now, we will be very grateful for some kind of response to our request as soon as it is possible for you and your staff. We ask, too, that you consider isotopic monitors for gaseous stacks and liquid effluent points of release for all nuclear power plants, not just those that are experiencing problems.

Sincerely,



Maria Glen Holt
Field Director, Citizens' Monitoring Network

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