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May 28, 1985
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Nunzio J. Palladino, Chairman
Thomas M. Roberts, Commissioner
James K. Asselstine, Commissioner
Frederick M. Bernthal, Commissioner
Lando W. Zech, Jr., Commissioner
United States Nuclear Regulatory Commission
1717 H Street, NW
Washington, DC 20555

Gentlemen:

RE: Three Mile Island Nuclear Station Unit 1
License No. DPR-50
Docket No. 50-289

The presentation to the Commission on May 22, 1985 by the Aamodts (and Dr. Johnson and Mr. Thompson who appeared at their request) included a number of statements which were presented as factual but which I am advised are either incorrect or misleading.

The thrust of the Aamodts' statement; i.e., that there are substantial health effects around TMI as a result of the operation of TMI-1 and the accident at TMI-2, is, as you know, contrary to the conclusions of all of the recognized scientific studies. However, you and others may not be aware that many of the factual statements or allegations on this subject made by the Aamodts are untrue. Attached is an evaluation by my staff in conjunction with Dr. John A. Auxier, Head, Health Physics and Dosimetry Task Group of the Kemeny Commission, of four such statements and allegations.

The continued allegations by the Aamodts, regardless of their accuracy, are causing concern among the public. The Aamodts made similar statements at a press conference and briefing for the Pennsylvania congressional delegation the day before your meeting. Thus, I wanted to immediately provide at least an initial response lest the allegations presented to you in a public meeting be given unwarranted credibility.

Very truly yours,

8509300079 850708
PDR ADDCK 05000289
G PDR

P. R. Clark
P. R. Clark
President

Attachment

cc: E. Blake, Shaw, Pittman, Potts & Trowbridge
TMI-1 Service List

INITIAL EVALUATION OF SEVERAL STATEMENTS/ALLEGATIONS
BY THE AAMODTS IN A PRESENTATION TO THE
NUCLEAR REGULATORY COMMISSION ON MAY 22, 1985

1. STATEMENT/ALLEGATION:

Transuranic radionuclides found in the TMI-2 auxiliary building

Reference was made to the existence of transuranics in the air in the auxiliary building a year after the accident. The Aamodts are referring to an eight-day air sample taken in November 1979 in the TMI-2 auxiliary building. The sample was analyzed by Lovelace Inhalation Toxicology Laboratory ("Characterization of An Aerosol Sample from the Auxiliary Building of the Three Mile Island Reactor", by George M. Kanapilly, et al, Health Physics Journal, Vol. 45, No. 5, pp. 981-982, November 1983).

Investigators found thirteen alpha disintegrations per minute for a one million liter sample of air. This corresponds to one six-millionth of a picocurie per liter of air, a level less than five one-hundredths of one percent (.05%) of the allowable worker level in the building. Thus, even in the auxiliary building, the level of transuranics was negligible. Furthermore, there is no basis for the Aamodts' assumption that any radionuclides that might have been in the auxiliary building air were released to the outside environment. The building filtration system effectively removed all particulate matter in the exhaust stream. This was confirmed by the off-site monitoring stations which have always been in place and showed no levels above normal environmental background levels. The data are provided in reports submitted to the NRC.

2. STATEMENT/ALLEGATION:

Air samples not counted for alpha radioactivity

The Aamodts maintained that during the accident, personnel were precluded from measuring samples for alpha radioactivity. This is incorrect. Air particulate samples from the station vent and eight environmental stations (off site) were routinely collected and analyzed for alpha radioactivity prior to, during, and following the TMI-2 accident. The results of the sampling program have been and still are being provided in routine reports submitted to the NRC. No alpha activity beyond expected background levels has ever been detected off site.

3. STATEMENT/ALLEGATION:

Inadequate alpha monitoring by the Environmental Protection Agency

As further confirmation that no TMI-generated alpha radionuclides exist in the environment, the Environmental Protection Agency (EPA) performed specific surveys of off-site residences in August 1984. These surveys were in addition to the routine monitoring program and were performed at the request of the NRC-TMI Program Office. Contrary to the Aamodts' suggestion, the methodology employed did not preclude detection of

transurancic. The monitoring was performed at locations where elevated radiation levels had been reported by Mr. and Mrs. Aamodt. Specifically, the EPA took direct radiation measurements, soil samples, and water samples at three private homes which had been identified by the Aamodts as having elevated radiation levels. In all cases, the EPA found that specific alpha radionuclides were below detection limits or within levels normally found in the environment. In addition, all beta/gamma levels found during the sampling were commensurate with levels normally found in the environment. [Letter from W. P. Kirk (EPA) to W. D. Travers (NRC), Subject: "Report of EPA Surveys and Radioassays on the West Shore of Susquehanna River Pertaining to Reports by Marjorie and Norman Aamodt of Elevated Radiation Levels", dated February 25, 1985].

4. STATEMENT/ALLEGATION:

Plume touchdown was not considered in the off-site dose estimates

The Aamodts asserted that the plume containing radioactive contaminants from TMI-2 at the time of the accident touched down in particular off-site locations and that this phenomenon was not taken into account. In fact, the mathematical models used to estimate doses to individuals and the population considered atmospheric dispersion, isotopic release rates, meteorological parameters, and topography. Therefore, they properly modeled the predicted movement of the plume, including its "touchdown", if predicted conditions caused that result. The effect of using such detailed modeling is that off-site dose estimates that have been conducted include consideration of the phenomenon of "plume touchdown".