

OCT 11 1983

Per-gex

The Honorable Michael D. Barnes
United States House of Representatives
Washington, D. C. 20515

Dear Congressman Barnes:

It is my sincere pleasure to nominate Ms. Janice E. Moore, Senior Litigation Attorney, Office of the Executive Legal Director, for the Congressional Excalibur Award. The dedication and initiative exhibited by Ms. Moore are characteristic of her fine performance and truly make her an outstanding candidate for this award.

Sincerely,

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

Enclosure:
Nomination of Janice E. Moore

Distribution:

EDO #13373
EDO Reading File
W. Dircks, EDO
SECY
CA-
P. Norry, Dir., ADM
M. Springer, Dep. Dir., ADM
O&P r/f (2)

8510010105 850904
PDR FOIA
DEZUBE85-564 PDR

OFFICE	O&P	O&P	O&P	O&P	ADM	ADM	EDO
SURNAME	JHunter:bh	GBenoit	NBentson	PBird	MSpringer	PNorry	WJDircks
DATE	10/ /83	10/ /83	10/ /83	10/ /83	10/ /83	10/ /83	10/ /83

OFFICIAL RECORD COPY

USGPO: 1981-33

NOMINATION

Janice E. Moore has been assigned as an attorney to the Hearing Division, Office of the Executive Legal Director, U.S. Nuclear Regulatory Commission (NRC) since 1978. Her responsibilities principally involve the organization, management and conduct of administrative trials before Atomic Safety and Licensing Boards and subsequent appeals. As a trial attorney, Ms. Moore must represent the NRC staff in complex and highly technical nuclear power plant licensing proceedings. This requires not only a detailed knowledge of the law but also an ability to read and comprehend a vast array of technical materials ranging from reactor core physics to seismological design criteria to probabilistic risk assessment.

Most recently, Ms. Moore was the lead attorney for the NRC staff in the Indian Point Special Proceeding. This administrative proceeding was instituted by the NRC to determine the extent to which the population around the Indian Point Nuclear Station (over 17 million people are located within a 50-mile radius, more than double the population around any other nuclear plant) affects the risk posed by Indian Point as compared to the spectrum of risk posed by other nuclear plants. It must be considered one of the more important adjudicatory proceedings in the history of the NRC since it is one of the first to examine risk assessment as a regulatory tool. It will be a precedent, not only in the legal arena but also as a technical example of severe accident considerations in reactor safety regulations. Ms. Moore performed a noteworthy service to the public by her willingness to work the extremely long hours necessary to identify and resolve the novel legal issues and to assist and counsel the technical staff in preparing comprehensive testimony for the proceeding. Her high personal integrity and competence exhibited in her handling of all phases of this litigation, including negotiations among the parties, written submissions and oral presentations, won the respect and admiration of the other counsel in the proceeding as well as the administrative judges hearing the case.

As a result of her outstanding performance in this proceeding as well as in past assignments, Ms. Moore has regularly been promoted and given greater responsibility in minimum time. These accomplishments are noteworthy for any attorney. However, Ms. Moore has overcome the handicap of blindness in order to achieve such remarkable results. Her responsibilities require her to frequently travel to other parts of the country on behalf of her client. Despite the unfamiliar surroundings, Ms. Moore has functioned without intimidation or fear, relying on mechanical devices and braille to provide needed reference, and obtaining needed geographical orientation from other NRC personnel who are required to attend the hearings as witnesses.

Ms. Moore is a consummate professional who is respected and admired for her legal ability. Her peers strive to emulate her because of her high personal integrity, moral character and devotion to public service.

United States Senate

WASHINGTON, D.C. 20510

September 14, 1983

Mr. Nunzio J. Palladino
Chairman
Nuclear Regulatory Commission
Matomic Building
1717 H Street, NW
Washington, DC 20555

Dear Chairman Palladino:

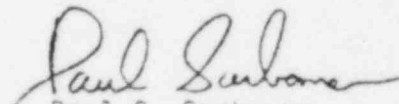
I am writing to express my deep concern about recent proposals associated with the continuing cleanup of the Three Mile Island nuclear generating station. It is my understanding that large quantities of radioactive waste water still remaining from the 1979 accident are being held at the reactor site. I am deeply troubled that one method of possible disposal of this wastewater involves discharging this material, which still contains significant amounts of tritium, into the waters of the Susquehanna River.

As I am sure you are aware, the Susquehanna River is already considered to be a primary source of pollution in the Chesapeake Bay, a body of water which federal research studies show to be in urgent need of positive remedial action. Consequently, I have serious reservations about this proposal. I strongly urge you to carefully consider more responsible methods of removing these wastes from this facility. I would like to be provided with information which details the current plans for dealing with this matter and the probable impact upon the environment.

Your careful attention to this matter is appreciated.

With best regards,

Sincerely,


Paul S. Sarbanes
United States Senator

PSS/klo

83010170690 JP

2

OCT 03 1983

Handwritten:
11/4/83 - not used

The Honorable Paul S. Sarbanes
United States Senate
Washington, DC 20510

Dear Senator Sarbanes:

Your letter of September 14, 1983, to Chairman Palladino has been referred to me for response. In your letter, you expressed concern about the possible disposal in the Susquehanna River of large quantities of radioactive waste water from Three Mile Island Nuclear Generating Station (TMI-2). To date, the NRC staff has not received any proposal from the licensee for disposal by any means of the water generated by the accident at TMI-2. The large quantity of radioactive waste water resulting from the accident has been processed to remove the vast majority of radioactive material that was present in the water. The source of the remaining radioactivity in the water is tritium which cannot be removed by conventional means.

The licensee of TMI-2 is prohibited from disposal of the processed accident water (PAW) by any means, including discharge into the Susquehanna River, pending submittal of a proposal from the licensee for disposition of the PAW and subsequent review and approval by the Commission.

Disposition of the PAW by discharge into the waters of the Susquehanna River is only one of the several possible disposition alternatives that were identified in the NRC staff's Programmatic Environmental Impact Statement (PEIS) on TMI-2 Cleanup. Since issuance of the PEIS in March 1981, the NRC staff has contracted studies to identify additional alternatives which may be feasible. Preliminary results of these studies indicate that alternatives involving the discharge into the Susquehanna River constitute only two of twenty-seven alternatives that have been identified.

The amount of PAW at TMI, including any increases of inleakage or introduction of non-accident water into any of the systems, is estimated to be at 1.9 million gallons through 1985. After having been processed through the demineralizer systems, the only major remaining radionuclide inventory in the water would consist of an estimated 2,600 Ci of tritium. To put this quantity into perspective, the amount of background tritium in the Susquehanna River that flows past the TMI site is estimated at 6,000 Ci per year. Thus the amount of tritium in the PAW is less than one-half the amount of background tritium in the Susquehanna River passing the site each

Handwritten: 83010170686

OFFICE	TMIPQ-NRR <i>MM</i>	PD:TMIPQ-NRR <i>R. J. Snyder</i>	DD:NRR	D:NRR	EDO		
SURNAME	MMashnik;bg	BJSnyder	EGCase	HRDenton			
DATE	9/20/83	9/26/83	9/ /83	9/ /83	9/ /83		

year. The staff has evaluated the radiological impact of the two disposition alternatives that would involve discharging to the Susquehanna River: (1) disposal by High Volume Release at 780 gpm for 40 hours and (2) Release for over a 4-1/2 year period. For the maximum exposed individual of the public, the total-body doses for the two release alternatives are 0.95 mrem and 0.14 mrem, respectively. It should be noted that the total-body dose to an individual due to natural background radiation in the TMI area is about 120 mrem per year. Therefore, the alternatives to release the PAW into the Susquehanna River represent an essentially negligible health risk. However, the public perception of the radiological health risk may result in socioeconomic impacts.

The TMI-2 facility has sufficient storage capacity for the processed water. Some of the PAW is being reused in-plant for the on-going cleanup activities such as surface decontamination and for providing shielding for cleanup workers from radiation sources. More extensive in-plant use of the water can be expected as major defueling activities are undertaken, for example, flooding of the fuel transfer canal. A proposal for disposition of the water is not expected from the licensee until plans for in-plant usage of the water during defueling and decontamination are firm.

In any event, when the licensee makes a proposal for the final disposition of the PAW, the Commission's decision will take into consideration the NRC staff's ongoing studies to evaluate the potential technical, regulatory, environmental and socio-economic impacts of the disposition alternatives. Also, pursuant to the February 27, 1980 City of Lancaster Agreement, the Commission had agreed that prior to holding any meeting to approve any discharge of accident-generated waste water into the Susquehanna River, except emergency discharges, the NRC would give notice of such meeting to the Mayor of the City of Lancaster. Additionally, the Commission has agreed to afford interested persons, as the Commission may determine, an opportunity to make technical presentations to the Commissioners of the NRC under procedures approved by the NRC.

I trust this responds to your concerns.

Sincerely,

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

OFFICE							
SURNAME							
DATE							