

April 30, 1985

PETITION BY ANTHONY/POE TO REOPEN THE RECORD ON THE BASIS OF NEW INFORMATION IN PHILA.ELEC. CO'S SEMI-ANNUAL EFFLUENT RELEASE REPORT, FEB. 1985.

EFFLUENT RELEASE REPORT. Phila. Elec. issued its No.1 report in February, covering 12/22/84 through 12/31/84. We were provided only part of the report; the rest we had to request and it was received on 4/2/85, except for the "attached pages" referred to in R.A. Mulford, 2/22/85 memo (last page of Attachment 12) which we have not yet received.

DEFICIENCIES AND ERRORS IN OFFSITE DOSE CALCULATION. Our health and safety are in danger because the methods for calculating dosages at the site boundaries are not in keeping with the regulations as follows;

Calculation of set points for isolation of reactor systems discharging gaseous and liquid effluents are distorted upward because the site boundaries on which they are based (Attachment D to the Semi-Annual Report No.1) are in error.

Attachment D., page 1 specifies the dose calculations " at and beyond the SITE BOUNDARY". This boundary is at 790 meters (p.5,6,9,10) or about 2,400 feet, and 762 meters (p.7,8) or about 2,300 feet. Calculations based on these boundaries are completely inaccurate. The closest approach by individuals to the plant is on the railroad right of way, @ about 900 feet from the south stack, and the next closest approach is @ about 1,500 on the Schuylkill River. The railroad and river are both accessible to the public and are not part of the plant property, not owned by PECO. (Att. D , Fig VI.A.1). Railway personnel are at risk.

Calculations based on these erroneous boundaries disqualify the whole methodology, as on pages 5-10, and 25-33.

Calculations on radiation poisoning from eating fish are underestimated (p.4) Fish could be contaminated at the river effluent outlet at only one half mile from the plant, caught, and eaten on the same day. The "one day delay" is in error, as is the distance (p.18) 1.9 miles. (See Fig. VI. A.1)

The changes to ODCM cited in Attachment D 1 " allow LGS flexibility..in setpoint for isolation." This amounts to degrading the standards, with substantial increases in radiation risk to the public. We petition against this degrading, and also against the modifications of release point weighting factor, and the averaging of emissions from north and south stacks. Since the nearest approach for the public is 900 feet a mass of gaseous radiation could travel this distance with little dispersion or dilution, directly from the south stack. Calculations in Atch.D, therefore, as set forth in the report are disqualified.

STANDARDS FOR REOPENING THE RECORD. We assert that the Board must grant our petition to reopen the record on radiation release standards because (1) our motion is timely since PECO's effluent report is new material which we could not have had earlier, (2) radiation releases to the public constitute a crucial health and safety issue with potentially fatal consequences, (3) a totally different result, with lowered radiation isolation setpoints, will result from calculations based on the findings above.

We petition the Board to reopen the record and to institute immediate hearings to determine adequate standards and methods, and to order a stay of low power testing.

cc: NRC Staff Counsel, Docketing, H.Denton, PECO.LEA, others on Serv. List

Respectfully submitted,
Robert L. Anthony
Box 186 Moylan, Pa. 19065

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