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TO: THE U.S. NUCLEAR REGULATORY COMMISSION

Response to NRC's Sept. 1, 1999 response to my letter of July 10th, 1999 concerning Y2K and other nuclear issues, AND comments to be included in the record, and for consideration, concerning NRC's proposal to allow the recycling, reuse, deregulation, "beneficial reuse", "clearance", allowing "residual activity" in, and in general releasing radioactively contaminated metals, cement etc. into the environment and consumer products, and the setting of levels (or not) to allow this - also known as: the ATOMIC CULT RUNNING AMOK -AGAIN.

"Genocide is herein defined as a structural and systematic destruction of innocent people by a state bureaucratic apparatus..." (From: "Taking lives - Genocide and State Power" by Irving Louis Horowitz. 1980)
My

From: Pamela Blockey-O'Brien.



"All living beings are members of ecological communities bound together in a network of interdependencies. When this deep ecological perception becomes part of our daily awareness, a radically new system of ethics emerges. Such a deep ecological ethics is urgently needed today, since most of what scientists do is not life-furthering and life preserving but life-destroying. With physicists designing weapons systems that threaten to wipe out life on the planet, with chemists contaminating the global environment, with biologists releasing new and unknown types of organisms without knowing the consequences, with psychologists and other scientists torturing animals in the name of scientific progress - with all these activities going on, it seems most urgent to introduce "ecoethical" standards into science." (Physicist Fridjof Capra in: "The Web of Life" Anchor books. 1996)

The AEC/NRC withheld information from the official safety analyses of nuclear plants that they gave to their own AEC/NRC Atomic Safety and Licensing Board Judges - as a result, the impartial safety review (required by the Administrative Procedure Act of 1946), by the Judges, didn't happen. (see p.9)

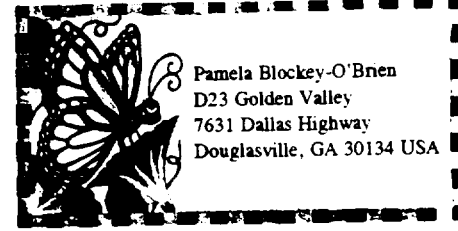
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TO the Secretary, USNRC
Please distribute
this and place
on the Dockets and
the Comments for
the record on NRC's
"clearance" rule ~~done~~
paper and NUREG 1640
issue. Thank you
Pamela Blockey-O'Brien

DS10



To:
The Executive Director U.S. NRC
and
Deputy Director Richard Wessman, Engineering
Division, Office of Nuclear Reactor Regulation,
US NRC,
Washington D.C. 20555

RE: Y2K ISSUES, & NRC's RESPONSE, & COMMENTS FOR THE Oct. 5th, 1999
RECORD AGAINST NRC's PROPOSAL TO ALLOW RE-USE, RECYCLE, CLEARANCE ETC.
Dear Sirs,

This is my response to NRC's Sept. 1, 1999 response to my
letter to NRC of July 10th re: Y2K and other nuclear issues.

I regret to inform you the response leaves much to be desired
to put it mildly.

A. 1) NRC's Guidelines and Acceptance Criteria (re: Y2K) were developed
utilizing NRC's Generic Letter (GL) 98-01 and the following industry
documents: Nuclear Energy Institute/Nuclear Utilities Software Manage-
ment Group (NEI/NUSMG) 97-07, "Nuclear Utility Year 2000 Readiness", and
NEI/NUSMG 98-07, "Nuclear Utility Year 2000 Readiness Contingency
Planning"., according to your response to me. In other words, the
nuclear industry more or less wrote its own ticket and NRC signed off
on it. Now, according to reports, NEI is the same outfit that got egg
on its nuclear face over NBC's recent TV movie "Atomic Train", due to
them trying a containment strategy regarding the movie. Of course, GE
is the parent company of NBC, and it probably suffered collective
cardiac arrest when it became known that the movie was originally
about nuclear waste too. GE is the proud (Plant Hatch and other plants)
designer of the MARK I Boiling Water Reactor (such reactors are ~~not~~ named
"40 minutes to meltdown") which brings me to NRC's saying on page
2 of its response to me, that: "A large release of radiation as a result
of a Y-2K-related (or other) event is highly unlikely. Nuclear power
plants are designed and built with multiple backup systems to ensure
plant safety. In addition, the plant containment - a large, concrete
and steel-reinforced structure - is designed to contain the radiation
in the highly unlikely event that there is an accident. For example, the
1979 Three Mile Island accident resulted in a partial meltdown of
nuclear fuel in the reactor core and high radiation levels inside the
containment but this high radiation was contained inside the plant
containment building, thus protecting the members of the community
from radiation exposures." About here, my dog threw up on the rug -
probably due to fright as I was yelling uncomplimentary words about NRC
so loudly. Let's get one thing straight - NRC can lie to everyone in
the world if it wants - just don't try it on me.

A large release of radiation is highly unlikely is it? What was
the 1982 release from the Ginna Plant in Rochester, NY of 90 CURIES of
radioactive gases, peanuts? How about the 141,500 gallons of radioactive
water contaminated with Mn-54, Co-60, Zn-65, Cs-134, Cs-137 from the
radioactive spent fuel storage pool at Plant Hatch, Georgia in 1986 which
wound up in the swamp and the Altamaha River (oh, I forgot the titanium-
-H-3 in it too) and don't confuse this with the 1979 spill that contamin-
ated the groundwater, I suppose that's nothing to worry about in NRC's
view. At Three Mile Island, the 14 Curies of radioactive iodines and
strontium released - awful as that was - don't tell the whole story - why
didn't NRC say in its response to me that the amount of radiation
released at TMI is unknown because there were no monitors permanently round
the site, and by the time portable monitors arrived (some faulty according
to a report) much radiation had already been released, radioactive steam
was escaping from the auxiliary building (don't you dare come back and
respond that the auxiliary building was not the containment building) and
did so for two weeks, originating from water pouring over the core in the

containment building splashing onto the floor and when drained, via the floor sump pump to the wastewater holding tank, could not be contained by that tank as the amount of radioactive water far exceeded tank capacity, and a pressure disc on the tanks side blew and hey presto - guess what wound up in the auxiliary building? (See: "Corporate Meltdown, the lessons of Three Mile Island" by Bill Keisling and Ed Perrone, editors of Harrisburg Magazine back then.)

Every nuclear plant in the nation has problems, read your own Dockets, not to mention that they are constantly releasing vast amounts of radioactivity to air and also dump to water in order to operate. As far as TMI is concerned, what about the memo entitled "Preliminary Estimates of Radioactivity Released from Three Mile Island" issued by Lake Barrett of NRC's Environmental Evaluation Branch, April 12, 1979 that estimated 13 million Curies of Xenon-133 alone, then coupled that with Livermore Labs estimate, and then said, on p.3 "This corresponds to 14 million to 34 million Curies of Xe-133 through April 5th which is consistent with the NRC estimate of 13 million." (!) Get it together guys! And what does Xe-133 decay to? Nothing like breathing in Cesium-133. How an estimate of 13 million can be consistent with an estimate of 14 million to 34 million, is beyond me. And what does NRC consider is "a large release"?

Not only all that, but Boiling Water Reactors for example of the Mark I type HAVE NO CONTAINMENT DOME, didn't NRC notice? Ask your own inspectors, read the documents. They have none, as GE was too cheap to build the huge one they'd require, and came up instead with the terrible, pathetic containment idea combining a "pressure suppression chamber" and a "torus" system - the whole thing according to reports, is one large design deficiency with "generic" (read generic as meaning no one has the foggiest idea) problems - , which brings me to the fact that there is nothing but the building roof above the reactor. Not that a containment means much, Chernobyl had a 1,000 ton steel cover plate filled with cement that got blasted into the air and came crashing back down on top of it, - Reports kept trumpeting that Chernobyl had no containment DOME, it got left out that it had this massive cover plate over it, that shot up like a champagne cork signaling the Year 2000, before crashing, which is what could happen at Y2k in various ways i.e. Happy New Year -Crash....

The design basis accident of the worst sort would, I presume, include the fact that in NUREG-1079, it describes how Pressurized Water Reactors of the Ice condenser type, such as Plant Sequoyah in Tennessee, in a "station blackout" would not only meltdown they'd EXPLODE. Plants like Hatch and those of similar design, would begin to meltdown in as little as 40 minutes if there is a loss of feedwater. Both these things could happen with Y2K failures. I repeatedly mentioned NUREG-1079 in my letter - NRC ignored it, and never mentions it in their response. I raised the issue of the 54 plants AEC/NRC allowed anyhow, knowing they were unsafe, as their staff had told them, plus that NUREG-1079 detailed what a catastrophe all nuclear plants described can be, and I asked NRC this question: To allow plants to operate which can explode or meltdown and rupture like at Hatch, and NRC knows it, is really criminal negligence isn't it? I want an answer to that question.

- 2.) There was no response to my recommending that utilities hire extra staff to go over their entire Dockets from prior to startup, so every issue ever raised, or listed as unresolved, open, follow-up or closed, is rechecked, AND why that should be done. I want a response to that.
- 3.) There was no response on my section on public safety, evacuation routes based on four of the most common windpaths, alerting and education of both the public and others to the real dangers on TV and radio - and also in Spanish due to the many Spanish speaking residents of the US, or on manual siren use in case of accident. I want a response to that.
- 4.) There was no response to whether that dump, Plant Farley in Alabama had ever fixed the 20 foot long crack in the floor of the containment. I want a response to that. I could go on and on in this vein, but I'll get to other issues, such as:

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5.) NRC's response to me states p.2., "Plant operators are trained extensively to deal with potential emergencies, and time tested plans including evacuation and notification procedures, are in place to deal with a plant accident whether or not it is triggered by a Y2K problem." And further on, NRC states: "NEI has developed guidance to assist licensees in developing their plans." Who is running the show? NEI? What power did Congress or the US Senate give NEI to do what the public thought was the job of the NRC? Answer please. As to the bit about plant operators etc., - with all due respect to the plant operators themselves, let us clarify a few things. A licensed reactor operator must only have a high school education and a few years of training; a non-licensed operator needs only utility provided training; a senior reactor operator is meant to have some sort of engineering degree. In the event of a problem, they have to get out a SITE SPECIFIC MANUAL, which tells them (while they frantically thumb through it, whilst trying to keep the reactor under control) what sort of an "Event" they should declare e.g. site area emergency, general emergency etc., based on what is in the manual. There is no doctor on site to assess the potential uptake of various radioactive contaminants to the public - the health physicist, if available, or radiation safety officer, generally can ONLY interpret the lousy guidelines that were set for the plant in question, and NRC's notorious regulations which never were set to protect the public, but set in order to enable the industry to operate. It is not only unfair to expect that plant workers try and make evaluations they are medically unqualified to make, concerning what type of emergency action should be taken while trying to respond to what could become a catastrophe, it puts workers and the public in danger. We have just seen on what "notification" procedures are based, so let us move to "time tested plans, including evacuation", as well as what NRC says further on, namely that Y2k contingency plans "include involvement of State and local response organizations". Have mercy! Take Georgia - and it would probably be comparable in many other states - the cited State and local response involvement, God bless them all (and I do not say that sarcastically) would wind up being akin to a bad Marx Brothers movie and they would not stand a hope in hell. At the time of the Atlanta Olympics, neither the State of Georgia's Radiation SURVEILLANCE Unit nor this region's NRC (which covers many states) nor the Georgia Emergency Management Agency had ONE SINGLE FULL FACE PIECE "CHERNOBYL" TYPE "MOON SUIT, OF THE TYPE REQUIRED TO DEAL WITH NUCLEAR CATASTROPHE, WITH SELF CONTAINED BREATHING EQUIPMENT BETWEEN THEM. The Federal Emergency Management Agency "thought" they had one somewhere in a box at a place about 45 minutes from Atlanta. Probably little has changed. If NRC now has some, please tell me how many, location, and health status of those who have to wear those awful things.

First responders in a nuclear catastrophe are the LOCAL emergency management people and the, often volunteer, fire departments. As one example, Plant Hatch (40 minutes to meltdown) is in a rural area, its radioactive spent fuel pool - (the one they dropped an over 300 pound bolt into that ruptured the liner and contaminated the hell out of the area) - contains thousands of deadly radioactive spent fuel rods, and is located at approximately between the fourth and fifth floor level (I told you the design is pathetic) the pool has the metal building roof over it, it is not under a containment dome, (remember, there is none) in the event of a loss of offsite power, and in the event the back-up diesel generators fail (and generators at various plants have failed in the past) even if a plant is SHUTDOWN prior to Y2K, there must still be power to pump the thousands and thousands of gallons of water a minute through the core so it does not melt, plus circulate it in the spent fuel pool so it doesn't boil dry, with a consequent catastrophe there also. Assuming a worst case scenario, leaving

out the radioactive spent fuel pool, and even assuming there is offsite power, the local emergency headquarters of the "Appling County E.M.A. Rescue Headquarters", is in what appears to be a converted gas station, they have a handful of rescue vehicles/ambulances and a converted school bus, an old one, this, and the adorable fire station (adorable as in "small and cute",) is what would be expected to rush to the scene first of a nuclear catastrophe. I have absolutely no doubt in my mind whatsoever, that these brave men and women would die trying to save the dying - their motto is : "Saving lives is our business. Won't you give us a hand ?" They'll be dying, while officials of the NRC and FEMA and others are sitting up in Washington, NRC perhaps with its NEI buddies, and the CEO's of Plant Hatch's ownership, namely Georgia Power Co./Southern Nuclear Operating Company/The Southern Company, will be sitting elsewhere too, as will the State of Georgia's Radiation Surveillance Unit (it's headquarters is a couple of hundred miles away approx. in Atlanta) and they do not have a doctor on staff either who specializes in radiation sickness, they are underfunded, understaffed, underequipped, and just like the NRC is, they are partly funded by their licensees the nuclear industry. In the Hurricane Floyd evacuation (and Georgia did a better job than many) people sat in their cars for hours and hours. A nuclear catastrophe would cause panic. I do not recall seeing signs down there that said "evacuation route for nuclear accident". There are many prisons in the plants windpath, including the Georgia State Prison at Reidsville just across the river. There is no way, with or without Y2K, that you could evacuate South Georgia in a hurry. What am I saying? - the evacuation zone only covers 10 miles (50 mile possible airborne ingestion along main plume) for nuclear power plants etc. that the Federal and State governments have to implement. If Plant Hatch blew, you lose the Altamaha River the Altamaha Sound, it hits the Atlantic, the towns on the coast have their fishing livelihood ruined even further (Hatch has already contaminated fish in the Altamaha), a sizeable chunk of south Georgia would be lost forever - people, plants, wildlife, crops, the lot. Similar scenarios could occur at countless other sites. Oyster Creek in New Jersey is a similar type of dump of a reactor to Hatch - I understand NRC has not even shut it down yet - it was meant to be shutdown. Plant Vogtle, another Georgia Power/Southern etc. reactor is in a similar rural area on the banks of the Savannah River across from the notorious Death of the Earth squad (DOE) 300 square miles of contaminated hell: Savannah River Nuclear Site (which released 191,000 Curies of Tritium alone into the air in 1993 - admittedly nothing like the 2.4 MILLION CURIES OF TRITIUM RELEASED in 1958 but still horrendous - don't worry, be happy, they boast about how they celebrate Earth Day and recycle cardboard), Plant Vogtle has a string of real doozies to its credit - besides that its diesel generator failed - if it's not leaking, it's being fined, if not that, it's welding defects, it's always something, never a dull radioactive moment - if you think it's bad now, what do you think could happen come Y2K? Southern's Plant Farley is another gem - (that darned radioactive iodine and noble gas release that even had the Death of the Earth squad (DOE) worried) - Farley has so many violations and problems it's a nightmare and I don't just mean the ones involving stupidity, like using contaminated money to catch an alleged thief NRC says (p.3) "steam generator tube integrity" continues to be "a concern darn right it's a concern. The problems NRC cites regarding the adequacy of Kaowool, fire main integrity problems and chronic pre-action sprinkler failure have gone on for ages - why doesn't NRC shut that dump down ?

At Hatch, NRC says that "more emphasis was being placed on the as low as reasonably achievable (my addition : "ALARA," Dr. John Gofman calls ALARA "planned deaths") program for personnel radiation dose and personnel contaminations" but that "additional improvement was warranted". Yes, 1,200 personnel contaminations a couple of years ago was outrageous - but NRC

RE:
FARLEY →

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has been telling Hatch/Ga. Power/Southern for years, repeatedly, how bad their radioactive personnel contamination is and threatening them with the usual - how about a \$200 Million dollar fine and a little jail time ? And what was the level of the contamination on those workers that got trapped in the drywell ? Are they still alive ?

What goes on at these plants is similar to what goes on at all other plants, read your own Dockets. If there is a major nuclear catastrophe at Hatch and Vogtle, resulting in massive radioactive releases due to Y2K or absent it, there is not a morgue in Georgia big enough to handle the dead. Is NRC and the folk at NEI going to come help bury their contaminated bodies in lead lined coffins ? Just don't forget the "moon suits".

6.) The cited "performance challenges" in the areas "of licensed operator training and operating performance" and "electrical breaker corrective and preventive maintenance" and other issues at Sequoyah are not confidence inspiring - particularly since it could explode as noted in NUREG-1079.

7.) The Docket on Nuclear Fuel Services in Erwin Tennessee is so horrendous, that I wanted to, and tried to, file a "2.206" against that monstrosity, that abomination of a nuclear fuel reprocessing/processing site as NRC well knows - but as NRC gave me the runaround I did not pursue it. I said it needed to be shutdown and the community compensated and the workers too, and that dump cleaned up - but no - got to make money off those deals concerning the Russians. The posturing of the administration and the DOE secretary regarding offering help to the Japanese on the recent disaster at Tokaimura was especially sickening in light of the fires, releases, on an offsite radioactive contamination (how's the plutonium contamination coming along ? Fence around it holding up ? Or did it actually get cleaned up ?) the uranium contamination in the Nolichucky river, the whole miserable mess at Nuclear Fuel Services - even worse, because the NRC told me, in writing, THAT THERE IS NO REQUIREMENT IN THE REGULATIONS IN 10.CFR Part 70 Domestic Licensing of Special Nuclear Material, FOR THE EVACUATION OF MEMBERS OF THE PUBLIC FOLLOWING AN EMERGENCY AT A DUMP LIKE THAT AND THAT THEREFORE "THIS MATTER IS CLOSED", WHEN I RAISED THE CONCERN THAT IN THE EVENT OF A MASSIVE FIRE AND EXPLOSION IT WOULD BE IMPOSSIBLE TO EVACUATE THE COUNTY IMMEDIATELY AND THE ADJACENT COUNTIES AND COUNTIES ON THE OTHER SIDE OF THE NORTH CAROLINA STATE LINE. The CDC investigation years ago was an outrage, and I don't just mean because they used NFS staff to help either, I mean things like: three weeks prior to CDC issuing its report on NFS, there was a massive uranium hexafluoride leak at NFS on August 7th 1979 and furthermore from Jan. 8th 1979 - Sept. 28th, 1979 i.e. including the time the CDC was meant to be examining both cancers and population radiation exposure, various instruments which were meant to exist, or measure airborne releases etc. had NOT been operating or assessed since Jan. 1st. CDC did not say a word - and that is the tip of the proverbial iceberg. I will be glad to tell the Inspector General and the US Senate the details.

So, if NFS blows up or has some other major accident, the people in the small mountain community can basically fry as far as it stands now, no help, nothing - just bring on that Russian nuclear crud and let the money roll in. Nuclear Fuel Services left that site in West Valley New York - massive contamination, the taxpayer gets stuck with the cost, they've got the money, honey, make them pay.

And what does NRC do ? According to NRC's response, they gave this (NFS) outfit a license renewal. Don't give me that NRC trite phrase it's computers regurgitate!" NRC inspection efforts continue at these and other licensed facilities to provide reasonable assurance of adequate protection of public health and safety" (p.4) NRC's own staff said it's a "terrible, terrible place".

↑ i.e. NFS

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8.) NRC admits (p.4) that "in spite of every reasonable effort by licensees to identify and correct Y2K computer system problems at their facilities, some software applications, equipment, and systems may remain susceptible to the problem," and admits systems external to facilities could be affected that would also affect the plants, e.g. loss of offsite power or communications. Also that "there is no doubt that cascading or even localized outages of generators and transmission facilities (meaning electric ity etc. in general nationwide - my addition here) could have serious short-term and long-term consequences." However, then NRC goes into a long diatribe on why we need "continued and safe operation of nuclear power plants during Y2K transition or rollover periods," listed as: " Dec. 31,1999 through Jan 3,2000; Feb.28,2000 through March 1, 2000; and December 30,2000 through Jan. 1, 2001."

There is no such thing as a "safe " nuclear power plant, for a variety of reasons - the main one being, that anytime the atom is being split and there are also staggering Curie quantities of radioactive materials (radioactive spent fuel, irradiated reactor hardware, piping, cement, fresh radioactive fuel etc.) in any place, but in particular in someones backyard, coupled with the almost constant problems, failures, human and mechanical error, there is extreme danger present. According to a section of the US Senate 100 day report I just recieved, it seems that peak demand during the winter months "will only be about 55% of the electric generation" capacity and that "even if 45% of the generation capability is lost" there "would still be enough electric power available to meet the demand." Nuclear power provides (depending on who is providing the figures) between about 16% and 20% of the nations electricity. Both NRC and I - and thousands of other people - know, that even if nuclear power plants are shutdown, they still require backup diesel generators to keep many things operating inclding for example, the pumps that haul thousands and thousands of gallons a second out of nearby rivers to cool the reactor core, and circulate water in the spent fuel pool so it doesn't boil dry from the radioactive decay heat coming off the spent fuel rods, have the cladding crumble and the whole thing turn into "the radioactive blob from hell" both in the pool and of course the reactor core - MELTDOWN..... Thank goodness some of the utilities are stocking up on backup diesel fuel to have on site (probably due to a lot of people, myself included, yelling about it,) but the diesel generators can fail, and what happens if they have to keep going for months ? Could they ? WHAT ARE THE PLANS IF THEY CAN'T ? ARE THEY GOING TO HAVE A FLEET OF FIRE TRUCKS WITH INTER-CONNECTED HOSES LINED UP AND A MASSIVE HAND PUMP SET UP DOWN BY THE RIVER ? A BUCKET BRIGADE CLOTHED IN MOON-SUITS, TEN THOUSAND STRONG ? WHAT'S THE BACK-UP ? At least if you shut-down every nuclear plant by the beginning of December, the middle at the very latest, -starting with the real lemons first and all those on line prior to 1985 - the reactor core itself will not be as vulnerable to problems that could be encountered if it had to be shutdown in the middle of the night on Dec 31st - shutting them down in some sequence over a period of say a month, would be less dangerous as it would not be doing anyone a favor to have to rush the procedures. To make up for energy lost, the nation should be told to restrict the use of all unneeded appliances (microwave ovens, electric lawnmowers, hair dryers, electric toothbrushes, and such) and use things like washers and dryers no more than an hour a day total, or less; ban all outdoor commercial lighting advertisements etc. (neon signs and similar) past 8p.m., and if need be, warn the public in advance of Y2K that power to all but essential services (hospitals, law enforcement, fire departments etc.) could be cut off totally for a couple of hours at night in warmer areas of the nation in order to shunt it to colder areas, or areas where it is needed most. Tell companies to close 15 minutes earlier to save power at work, fast food outlets, restaurants, malls and convenience stores/gas stations likewise. That alone should take care of the bulk of it. Plus, tell the nation to adjust their thermostats to use less energy, and use public transport as much as possible for the same reason. Simple. The fact is, nuclear power is not needed here, and is kept going solely to keep the uranium cartels and the weapons boys in business anyway worldwide. (Mox, reprocessing, tritium for nuclear weapons, uranium and plutonium for weapons of mass destruction etc.)

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9)

All nuclear research reactors on university campuses should also be shutdown. And not just because they emit radioactive contaminants onto our young people via airborne contamination onto the campuses they are on, but because they are dangerous AND present prime terrorist targets in highly populated areas as I have told NRC until I'm blue in the face -remember what it took to get the Georgia Institute of Technology's dump of a reactor shutdown? NRC did not mention nuclear research reactors in their response to me. I said they should be shutdown. I want a response to that too.

I have no idea why the NRC is suddenly worried about plants being modified or design bases information not being maintained (p.6.) all of a sudden - it never worried NRC/AEC before. All the licensee has to do is write in, say they want to change something, NRC/AEC gives it the once over and basically usually agrees. It has been an outrage for years. Works the same with exemptions. They want an exemption, NRC gives it. NRC gave nearly every plant in the nation an exemption from criticality monitoring systems, NRC **just** hands them out a dime a dozen. All they had to do was ask, some, in asking, (e.g. Georgia Power/Southern Nuclear Operating Co/Southern Co's plant Hatch) pleaded poverty more or less. If Y2K messes everything up, you won't have to worry about criticality monitoring systems and associated emergency procedures for the purpose of detecting and responding to accidental criticality (HOW IS TOKAIMURA DOING TODAY?) because THEY DON'T EXIST. Most of the Plants have thousands and thousands of highly radioactive spent nuclear fuel onsite and all they had to say was everything was fine, nothing will happen, we don't need a criticality monitoring system, and NRC said fine. The "public interest" part of the STANDARD even got junked. Many have reracked their pools and are in earthquake zones as well and, at Hatch, they are having a little trouble getting "seismically qualified". But hey, if the earth rumbles and the whole lot slides together - no alarms going to be a lot of help I suppose, but it might save just one life. DOES NUCLEAR FUEL SERVICES IN ERWIN, TN HAVE AN EXEMPTION?

Three Mile Island got exempted, Fermi got exempted from some requirements even though Fermi HAD a criticality accident in the eighties, from San Onofre to millstone, from Paducah Gaseous Diffusion to Framatome Cogema Fuels, from the Department of Commerce National Institute of Standards to Sequoyah, from Peach Bottom to Fort Calhoun Station, from Farley to Brunswick, from Watts Bar to BWX Technologies (who are storing crud in trailers outside) From Teledyne Isotopes N.J., to Babcock and Wilcox (storing UF6 outside) and more and more - NRC gave them exemptions. This should not be allowed, and with Y2K they should not only have them, but should have battery backup to them. Since they are all too cheap to do it, even if the possibility is slim that it can occur, it shows how little they and the NRC really care about public health and safety.

As for NRC's attachment of their Preliminary Report on Y2K Readiness (what happened to "COMPLIANCE"?) the following sentence speaks for itself: "ON THE BASIS OF ITS REVIEW OF THE 103 OPERATING POWER PLANTS Y2K PROGRAMS, THE STAFF CONCLUDES THAT LICENSEES FOR 89 NUCLEAR POWER PLANTS HAVE IMPLEMENTED Y2K PROGRAMS CONSISTENT WITH INDUSTRY GUIDANCE. " **INDUSTRY GUIDANCE ?????** THE REST OF IT IS SO OUTRAGEOUS I DON'T FEEL LIKE REPRINTING IT ALL - BESIDES, I'M TIRED, AND I DON'T GET A FAT PAYCHECK LIKE NRC STAFF DO.

Last, but not least, if what NRC considers to be a "detailed Assessment" for Y2K at the plants, "detailed", I certainly couldn't bear to see the short form. I guess leaving out how many plants have cracked core shrouds (including Hatch) held together by braces that can snap due to metal fatigue, irradiation and vibration doesn't matter either. The road to Hell, Gentlemen, will be paved with radiation - and not even figuratively, since radioactive flyash from sewage sludge incineration containing radioactive sewage, due to sewer dumping of

of radioactively contaminated water, gets incorporated into cement and other building materials like bricks, and then the roads are paved with it - the road to Hell I'm speaking of, is the one that is bound to happen sooner or later, the one that results in a fully blown meltdown, and with Y2k around the corner, plus the awful way this has all been handled leading up to it, could well make Hell "sooner" rather than "later", a grim reality.

When the NRC's forerunner, the Atomic Energy Commission, hooked up with the Georgia Power Company and the Georgia Institute of Technology in the 1950's to bring the research reactor to Georgia Tech, (the one I am proud to say I helped force shut-down of) so that people could be trained on it to run reactors, so that the entire South could be nuclearized, and of course the Department of Defense and the AEC/Dept of Energy - (for those who don't know, the AEC became NRC/DOE/ERDA when it was split up by a disgusted Congress, and a few leftovers wound up at EPA, but little changed) - all did their nasty little experiments, and all that animal torture was done there, the result of it all has been the radioactive trashing of the South, which continues to this day. We have enough to contend with, thanks to NRC and formerly the AEC letting a system of pre-meditated, radioactive slow murder of the people and the natural world, due to the radioactive emissions from all this affecting everything and bioaccumulating, go on to this day. But the toadying of the NRC to the industry has reached an all time high point, by allowing industry to write its own ticket on Y2K.

I'll admit that the Death Of the Earth squad (DOE) and it's counterparts worldwide such as Minatom/Minsredmash and the Siberian Chemical Combine who gave Russia and the peoples of the former USSR, Tomsk, Chelyabinsk and Krasnoyarsk, are a billion times worse than the NRC - just as I would imagine NRC would do a better job if it did not have to depend also on getting money from its licensees, was properly funded, could employ a fleet of medical specialists and so on - but that does not excuse more or less allowing industry to run the show. The best thing NRC has done in decades is the recent action against Northeast Utilities fining them \$10 million - but the perpetrators should have gone to jail for life.

NRC has a very short time left to act concerning Y2K. Shut them ALL down because in reality the risk of not doing so is simply too great. As I understand it, the rest of the world is in even worse shape on this issue, some countries worse than others. It did not help that US bombing/~~NATO~~ bombing of Yugoslavia, in particular of the Pančevo complex - a combined petrochemical, fertilizer and polyvinyl chloride manufacturing complex - has had absolutely disastrous consequences according to reports, due to the huge amounts of ammonia, ethylene dichloride, vinyl chloride, 100 tons of mercury, 800 tons of hydrochloric acid, thousands of tons of caustic soda and 250 tons of liquid chlorine to air and water and the place is next to the Danube river, the primary source of drinking and agricultural water for millions downstream also in other countries. To try not to make the air route even worse, authorities reportedly released some of the chemicals including ethylene dichloride into a nearby channel that flows into the Danube. As of last May, the ethylene dichloride was at the bottom of the canal channel, but when it moves, Bulgarian nuclear reactors at nuclear power plants there could have the reactors cooling water intakes and pumping systems fouled - apart from which, they are those awful VVR 440-230 types, with no containments and a string of safety related problems. (See: Science for Democratic Action report Vol.7., No. 4 July 1999 on this and the mess at Tomsk etc.)

It appears that all reactors worldwide should be shutdown. Due to the stupidity of many nations relying much more on nuclear power, this could cause serious hardships, with potential for widespread fatalities as it will be deep winter in many of them - but it could be far worse if they are not shutdown - therefore, the populations in those countries should be warned, by all means available, to prepare, stock up on wood, coal, camping stoves etc. and an international advance relief effort should be done at once to ensure stockpiles of extra blankets, fuel, (for wood stoves and fireplaces) and generators and food to critical areas. Countries like France and Britain can probably do that without outside help, but many others can't. NRC must therefore not only put its own house in order, but should push that the aforementioned international actions

start immediately to try and head off catastrophe elsewhere.

NRC's own contribution, could be to send a safety checklist (a real one !) which would include basic emergency actions to every plant in the former "East bloc" and other high risk countries - get the list from the CIA or someone - as fast as possible, including tips on safe shutdown. It is not as if NRC itself does not have the technical knowledge - it's just that industry runs the show here for the most part, plus, I have been told ^{NRC} often takes industry's side over workers concerns due to NRC's close relationship with industry.

The fact is, no one knows the extent of what we face, therefore the world must act as if it faces a worst case scenario and hope that it does not happen. As I have stated before, people must be warned - and not just concerning nuclear issues - to prepare. An informed public is less likely to panic, and more likely to pull together. Even the most optimistic scenarios agree there will be some problems. It has been said that the NRC and the industry would not want to warn the public of problems, evacuation routes and preparedness within 100 miles of each facility , as that would disclose to the public how dangerous nuclear technology is and the nuclear fuel cycle/ weapons cycle in general.- There are two answers. The first is the public has a pretty good idea that they are in more danger than they've been told. The second is : Tough luck,- NRC and the industry is just going to have to grit their teeth and do it for the good of the nation and the health and welfare of the public. If it is not done, and it turns out to be a catastrophe come Dec.31st , I have a bad feeling that any survivors are not going to be kindly disposed towards NRC and the nuclear utilities etc. at all.

Nothing in this letter should be construed as being a personal attack on any individual within the NRC or the industry This is not about such things, it is about the welfare of all. It is just that NRC's track record and industry's track record on the Dockets and in inspection and other reports speak for themselves. It cannot go on in this manner. I will end with the following quotes:

- 1) "As citizens, you will also have to decide what to do about the one hundred nuclear plants that are now operating - WITHOUT BENEFIT OF THE IMPARTIAL SAFETY REVIEW REQUIRED BY LAW - around the United States."
- 2) " FOR what was the Joint Committee (Congressional Joint Committee) on Atomic Energy doing as the Atomic Energy Commission and the Nuclear Regulatory Commission hid data about potential nuclear plant hazards ? And what has the White House been doing - except looking the other way - as official bodies, such as the President's Commission on Three Mile Island Accident, warned of the gross mismanagement that has occurred in the commercial nuclear power program ?"

Both quotes are by Samuel W. Jensch, Former Chief Administrative Law Judge, United States Atomic Energy Commission, quoted in his foreword to "Meltdown - the secret papers of the Atomic Energy Commission," by Daniel Ford, former Executive Director of the Union of Concerned Scientists. Revised Touchstone Edition, 1986, published by Simon and Schuster. (ISBN 0-671-63449-6)

By the way - I resent that the authors of the Atomic Energy Act of 1954 had copied their provisions for reactor licensing almost word for word from the Federal Communications Act of 1934, which had established procedures for the federal licensing of radio stations, according to the above source/book - sort of "put the radio on the table, Mabel, and dance the radiation tango", type of attitude to the most awesome power ever invented. That's why NRC calls them industry "licensees" after all. Also it's about time the NRC told the public, and Congress, that their definition of no "credible" accident or safety problem only means that during the worst "class 8 accident", AEC analysts concluded that there would be no major environmental impact because existing safety systems could be counted on to work satisfactorily, and even though they might fail, AEC staff concluded it was so "highly unlikely" it created no "credible" safety problem. AEC/NRC is the one with the credibility

10:

problem. NRC's use of the word "generic" alone - meaning labeling a problem as "generic", - is a "convenient way of postponing decision on a difficult problem" as concluded by the presidential commission investigating Three Mile Island (see aforementioned Ford book Meltdown) - NRC still does it - as I said, NRC/AEC/etc. has a credibility problem - telling the truth might help fix it.

B. NOW WE COME TO NRC'S PROPOSED RULE TO ALLOW THE RECYCLING, REUSE, DEREGULATION, SO-CALLED "BENEFICIAL RE-USE"; CLEARANCE, ALLOWING "RESIDUAL RADIOACTIVITY", (AND A WHOLE LOT MORE EUPHEMISMS AND ORWELLIAN "DOUBLESPEAK") OF RADIOACTIVELY CONTAMINATED METALS ETC. INTO THE ENVIRONMENT AND INTO CONSUMER PRODUCTS .

I testified against this in earlier lives when it was known as "BRC", when NRC Commissioners were inventing numbers , remember - and as "ERORR" when NRC got that industry front , the Keystone Center, with all its supporters from government agencies and the movie industry/entertainment industry to try and repackage it and resell it , and set up cosy little "stakeholder" groups to shove it down the national/international throat. If NRC and the Death Of the Earth (DOE) squad think I was upset then-(when representing approx. a quarter of a million people) it doesn't hold a candle to how upset I, and millions of others, are this go round.

The Death of the Earth (DOE) squad has already been allowing it, with a little help from British Nuclear Fuels/FOOLS, according to reports. NRC is allowing radioactive materials to be shipped hither and yon under the title "steel making additive - non nuclear end use" on their Import-Export documents, or, a s radioactive Depleted Uranium. So a good chunk of the world has been contaminated. Not to be outdone, the European Euratom "Basic Standards" lot, are pushing it, and they've been allowing some of it anyway - using the notorious ICRP standards , which have included allowing "a permissible genetic dose" (to sperm and ovum) and also allowing radiation levels to provide quote " reasonable latitude for the expansion of atomic energy programs into the foreseeable future" (see ICRP Publications 2 and 9 according to Dr. Bertell in "No Immediate Danger -Prognosis for a radioactive earth") and of course often there are references made by outfits like the National Academy of Sciences in their BEIR reports, to the so-called "Life Span Study"

done on Hiroshima survivors, a crooked study if there ever was one, as it didn't start until 5 years after the bombing, when countless survivors had died and countless children had been spontaneously aborted or born dead etc., so it was not representative of the true effects of ionizing radiation anyway. All of this to try and convey it's fine, and to get people to focus on cancer endpoints only, and not on all the other things radiation causes such as chromosome aberrations etc. destruction of the immune system response and so on. The most important thing is what even The National Academy of Science's Committee on the Biological Effects of Ionizing Radiations , Number Five - BEIR V "for short- had to admit, namely : "Ionizing radiation damages the genetic material in reproductive cells and results in mutations that are transmitted from generation to generation ". (Opening sentence of Chapter 2 on Genetic effects of Radiation) It should be understood that the DOE also gives funds to the Academy and BEIR V was supported by OAK RIDGE Associated Universities, it is essentially a government document.

A little further in Chapter 2 of BEIR V, they say "DELIBERATE EXPOSURE OF HUMANS TO RADIATION WITHOUT DIAGNOSIS OR THERAPEUTIC JUSTIFICATION IS UNACCEPTABLE...." yet this is exactly what DOE, NRC, ICRP, EPA etc. have been

11.

doing, and allowing for decades, and now want to increase. Let us remember radiation is a form of energy. Let us remember what the measurement "Curie" means. A Curie is standardized to radium. ONE CURIE GIVES OFF, ON THE MACROSCOPIC LEVEL, 37 BILLION MINIATURE NUCLEAR EXPLOSIONS A SECOND, euphemistically called "transformations" or "disintegrations"

by scientists. Even if you get down to the milli-Curie or micro-Curie level of exposure, you are still talking about some considerable cell smashing going on. Let us picture a cell: it is an extremely complex tiny structure, all structures relying on every other, and all cells working with every other in so-called "intercellular communication" in the body. Cell DNA carries your entire genetic makeup going back generations upon generations, to ancestors that may have started out in another culture, another country. DNA produces RNA molecules, which contain instructions for the production of proteins, including enzymes. Certain enzymes which can repair DNA under other circumstances. To Damage DNA-, resulting from the cells exposure to "these microscopic explosions with the resultant sudden influx of random energy and ionization" (See Bertell: No Immediate Danger) causing cell death or alteration, has massive consequences. Damage to the cell, period, can leave it unable to reproduce itself, kill it, or produce different hormones or enzymes than it should - the list is almost endless. In time millions of cells can be damaged, because an "altered" cell may also still be able to reproduce other cells, but they'll generate the same different, or altered, hormones or enzymes etc. It can mess up the cells resting mechanism, resulting in a "runaway proliferation of cells in one place, which, if not destroyed, will form a tumor, either benign or malignant. The abnormal proliferation of white blood cells is characteristic of leukemia..." (Dr. Bertell, "No Immediate Danger"). In the human female and male, the eggs in the ovary a girl baby is born with, contain a certain number of chromosomes - radiation damage at a young age to these eggs, will later result in problems in her offspring when she marries and an egg is joined with her husband's sperm - that sperm, also containing a certain amount of chromosomes, may also have chromosome damage from radiation exposure, when both egg and sperm unite, what should happen under normal circumstances, is that the correct, undamaged number of chromosomes come together creating a new perfect cell - the fertilized egg. That cell then divides repeatedly and forms more cells and the baby. Even assuming that no damage has happened up until conception, if the mother is exposed to radiation in pregnancy, the consequences are well known, and include spontaneous abortion, death of the fetus, birth defects, and leukemia after the child is born. The developing nervous system is particularly sensitive to the effects of ionizing radiation. Severe mental retardation can be one result.

Radiation, in combination with toxic or hazardous chemicals to which people are exposed, such as pesticides, compound the problem. Rachel Carson foresaw years ago that Strontium-90 is a "sinister partner" interacting with such chemicals and air pollution to "accelerate the process of human carcinogenesis". (See THE ENEMY WITHIN - BY Dr. Gould, former member of the US EPA's Science Advisory board; Dr. Sternglass Professor Emeritus of Radiological Physics University of Pittsburgh School of Medicine, and others). Of course radiation also can cause sterility in men and women, menstrual problems in women, every type of cancer and as stated before, is a powerful suppressor of the immune system response.

There is no threshold below which there is no damage from radiation. As I have said in the past, NRC even admitted back in the seventies there was no "safe" level. The sheer volume of contaminated metals, cement etc. from NRC licensees and DOE sites is staggering; millions and millions of tons. To give one tiny example, the radioactively contaminated lead from the small Georgia Tech Neely Nuclear Research Reactor, NRC is allowing (and

and the State of Georgia's Radiation Unit) to be junked, as "Mixed

waste" - one of those items that falls through the regulatory cracks to help the nuclear industry - comes to 133,000 pounds - just the lead, contaminated through and through, comes to that, from one little (in size) reactor - it'll probably wind up going through a smelter, and the plutoniums will come out the stack as well in the process to kill for up to the next 240,000 years (the full, radioactive life, not the half-life people get snowed on) and some will remain in the newly smelted product.

Professor Wolfgang Köhnlein of the Institute for Radiation Biology of the University of Münster, Germany, has stated that depending on the type of radiation emitted by a given contaminant - e.g. alpha, beta, gamma, neutron, - very low levels of ionizing radiation are forty, sixty or even one hundred times more dangerous and damaging than previously believed. He is not the only one who knows this in the medical/biological community worldwide. He is also one of many scientists who have described how "the industry regulates itself" and how the International Commission on Radiological Protection elects itself and is not under the watchful eye of, nor has to report to any parliamentary body. NRC itself has, I believe, just one doctor on staff. It does not even do its own testing at, say nuclear power plants, but relies on industry to do its own testing or contract it out. The entire system is a sham, and it's the same catastrophe multiplied by thousands at Death of the Earth squad (DOE) sites .

The end result of NRC's allowing (or any other body or government anywhere) vast amounts of radioactively contaminated materials and metals to be recycled/released/cleared, or whatever name it is given, onto the market, no matter what "levels" or "doses", is a disgrace. Not only will any "level" or "dose" add to the already existing exposure people and animals, birds, wildlife and plants must endure from other sources of ionizing radiation (e.g. the Cesium-137 and Strontium-90 as decay products in noble gases coming from nuclear power plants regularly) and from so-called "Technologically Enhanced" natural background radiation (double speak at work again here) and doses coming off DOE sites, processing/reprocessing facilities and things like the 1,500 Kilos of radioactive Depleted Uranium in Boeing 747's, and DU in Yachting keels, oil well sinker bars and the like, (not to mention the airborne radiation coming off wasteponds etc.) but, the ultimate result, the final result of an Atomic Cult run amok will be GENOCIDE. In fact, the DOE, NRC, ICRP and the International Atomic Energy Agency (whose sole purpose according to their charter is basically to nuclearize the globe, which they are in the process of doing by all means necessary - including inserting tracers in Third World babies supposedly to measure breast milk intake...) are already committing genocide, as is the nuclear industry, by purposefully allowing the release of ionizing radiation, even calculating the amount of deaths by cancer it will or can cause, which shows INTENT to kill or destroy, and knows the damage to DNA etc. will also ultimately cause the dying out of entire gene lines/families, groups and/or their sterility, caused by radiation, resulting in the same.

The GENOCIDE CONVENTION APPLIES. IN PARTICULAR ARTICLES A), B), C), AND D), which reads: Article 2. "IN THE PRESENT CONVENTION, GENOCIDE MEANS ANY OF THE FOLLOWING ACTS COMMITTED WITH INTENT TO DESTROY, IN WHOLE OR IN PART, A NATIONAL, ETHNICAL, RACIAL, OR RELIGIOUS GROUP, AS SUCH: (a) KILLING MEMBERS OF THE GROUP (b) CAUSING SERIOUS BODILY OR MENTAL HARM TO MEMBERS OF THE GROUP: (c) DELIBERATELY INFLECTING ON THE GROUP CONDITIONS OF LIFE CALCULATED TO BRING ABOUT ITS PHYSICAL DESTRUCTION IN WHOLE OR IN PART: (d) IMPOSING MEASURES INTENDED TO PREVENT BIRTHS WITHIN THE GROUP."

The US (finally) ratified the Genocide Convention. If DOE does not stop its

current case by case releases, and proposed releases; and if NRC does not stop the importation of radioactive metal from elsewhere for "clearance" into, and recycling in, the US marketplace; and if it does not stop allowing nuclear reactor parts to be processed and "released" as part of decommissioning and repair of reactors; and if the NRC does not stop the Tennessee Department of Environment and Conservation from licensing radioactive metal companies to process and release radioactive metals into the marketplace and revoke its Agreement State status, and do the same to any other state that does likewise; and if NRC does not stop the export of radioactively contaminated materials of all types for recycling, or as "additives"; and if the NRC goes ahead and legalizes, and passes, "clearance" of radioactively contaminated materials of all types and under all names and euphemisms, into the environment and marketplace and fails to stop radioactive sites contaminated with ANY level of radioactivity from being released for unrestricted use; and if NRC does not stop licensees from doing it; and if EPA and NRC and DOE do not shutdown the incinerators at Oak Ridge and Savannah River Nuclear Site, which release radioactivity to air, as well as fails to stop commercial incinerators from burning "low level" trash, and if the NRC does not stop nuclear power plants and research reactors from releasing radioactive so-called "noble gases" to air - some of which decay to Cs-137 and Sr-90 - and prohibit dumping of radioactive effluent to waters of the United States, by licensees, including those that hold Special Nuclear Materials licenses - if this is not done, how does A CHARGE OF GENOCIDE FILED AT THE WORLD COURT LOOK TO ALL CONCERNED ? And you can be sure we'll include what has been done to the Native American Indians concerning radioactive contamination and genocide, and what NRC intends to allow in connection with HRI's proposals for uranium mining, and a processing facility, on Navajo land in the Crownpoint area, which will purposefully contaminate an aquifer that is the drinking water for 10,000 people. Don't do it. STOP AND REVERSE this environmental and human disaster. That is what I have to say at present. Just remember, by sentencing innocent people to death by cancer, without Due Process, violates the U.S. Constitution too, and the estimated number of people who will get cancer and die if "Clearance" goes through, according to NRC's own calculations, sort of makes everyone involved mass murderers.

Whatever happened to "Thou shalt not kill ?"

Pamela Blockey-O'Brien.

Pamela Blockey-O'Brien (Member, International Fellowship of Reconciliation - and currently not feeling particularly reconciliatory- Ecologist and Human Rights Advocate. Former Non-Governmental Organization Delegate to the U.N. Second Special Session on Disarmament, 1982, which was a massive failure thanks to the global nuclear weapons interests.)