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FROM: DUE: 09/25/01 EDO CONTROL: G20010378
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FINAL REPLY:

Dade W. Moeller
New Bern, North Carolina

TO:

Chairman Meserve

FOR SIGNATURE OF : ** PRI ** CRC NO: 01-0453

Chairman

DESC: ROUTING:

Issues Related to Radionuclide Emissions and Their
Potential Health Effects (Tooth Fairy Project)

Travers
Paperiello
Kane
Norry
Craig
Burns/Cyr
Collins, NRR
Paperiello, NMSS

DATE: 09/14/01

ASSIGNED TO: CONTACT:
RES Thadani

SPECIAL INSTRUCTIONS OR REMARKS:

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Date Printed: Sep 13, 2001 17:36

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ACTION OFFICE: EDO

AUTHOR: Dr. Dade Moeller
AFFILIATION: NC
ADDRESSEE: CHRM Richard Meserve
SUBJECT: Concerns issues raised by the Radiation and Public Health Project

ACTION: Signature of Chairman
DISTRIBUTION: RF

LETTER DATE: 09/04/2001
ACKNOWLEDGED No
SPECIAL HANDLING: SECY to Ack

NOTES:
FILE LOCATION: ADAMS

DATE DUE: 09/07/2001 DATE SIGNED:

EDO --G20010378

147 River Island Road
New Bern, NC 28562-3656
September 4, 2001

The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Meserve:

This is to acknowledge and thank you for your letter of August 15, 2001, and the copy of the response of the NRC staff to the issues raised by the Radiation and Public Health Project. The review by the NRC staff of the issues raised, the information paper on strontium that they prepared, and the staff report on the various issues related to radionuclide emissions and their potential health effects, are well written, well documented, and thorough.

With all due respect, however, I believe that these items will not enable the NRC staff, the commercial nuclear utilities, and/or the affected state public health departments to cope effectively with this particular challenge. As noted by the experience in the Turkey Point hearings, the NRC staff will be forced to repeat the process of rebutting the false claims of Dr. Gould, et al., each time one of the nuclear utilities applies for a renewal of an operating license. In a similar manner, each utility, as well as the relevant State Department of Public Health, will have to prepare a detailed rebuttal to what, in essence, will be a new set of claims prepared by Dr. Gould, et al., on each such occasion. This is due to the fact that Dr. Gould, et al., represent a "moving target." In fact, they have become very skillful in distributing their false information. If they are permitted to continue this process, the net result will be a continuation of the wasting of critical resources by your staff, the utilities, and the relevant state agencies, as well as others.

At the risk of being presumptuous, I want to suggest an approach for defusing this situation. The first item that is needed is a clear and concise independent rebuttal of the claims of Dr. Gould, et al. To provide the proper credibility, such a rebuttal needs to be prepared by a representative of the scientific community that is independent of both the NRC and the nuclear utilities. Two examples that come to mind are the National Academy of Sciences, or the National Council on

Radiation Protection and Measurements. The task assigned to them would be to conduct a review of the reports prepared by Dr. Gould, et al, and prepare a detailed rebuttal to their accusations. Armed with such a report, I believe that the NRC staff, the utilities, and the relevant state agencies, would be provided the tools they need to counteract the claims of Dr. Gould, et al.

Regardless of the independent organization selected, such a review would inevitably contain one or more statements to the effect that the reports by Dr. Gould, et al., contain basic errors and are misleading. If "sound bites" from such statements were published in the local newspapers a few days prior to the hearings for each plant, the factual information presented would be an effective mechanism for defusing the false information from Dr. Gould, et al., before the hearings were held. Without such a statement and such an approach, I honestly fear that Dr. Gould, et al., will continue to "shock" the unsuspecting public with their claims. Once this occurs, the damage has been done. What I am suggesting is that you provide the utilities with the information they need to alert the public to the errors in the claims of Dr. Gould, et al., prior to their appearance at any such hearings.

Thank you, in advance, for your consideration of these suggestions.

Sincerely,

A handwritten signature in black ink that reads "Dade W. Moeller". The signature is written in a cursive, flowing style.

Dade W. Moeller, Ph.D.

cc: The Honorable Greta Joy Dicus
Dr. E. Vincent Holahan

Dade W. Moeller
147 River Island Road
New Bern, NC 28562-3656



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The Honorable Richard A. Meserve
Chairman
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