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The Executive Director,
United States Nuclear Regulatory Commission,
Washington, DC 20555

To: Dyer, NRC
Ref. G20050462
Due 9/6/05



Aug. 2nd, 2005

Re: My 2.206 Petition under 10 CFR Chapter 20 and my requested shutdown, site cleanup etc. etc. of 23 GE Mark 1 nuclear lemon BWR's, 9 Westinghouse Ice Condenser PWR's, 15 Special Circumstance Reactors and 2 nuclear fuel facility Death Traps from Hell.

Prior to my July 28th 2005 2 p.m. recorded phone conference call with NRC, the NRC sent me a list of 24 questions they wanted me to answer during the call. Questions basically geared to finding out if I actually had sources to the Petition I had spent over nine months working on. The first question was: "Would you generally specify sources of information for the petition that do not include the NRC docket?" Not long into trying to list some of the sources, which I had basically whittled down to going through the alphabet twice, plus two, to 54 answers, NRC suddenly didn't want me to answer its own question fully, so it went backward and forward with me trying to answer question 1., and NRC not interested in the answer. Near the end of the call, NRC then said I could submit the answer in writing, and NRC would add it as a supplement to the Petition, if I agreed, so I said yes.

Here is the answer to question one, generally specified, whittled down:

NRC question to me: Would you generally specify sources of information for the petition that do not include the NRC Docket.

My (Pamela Blockey-O'Brien) answer:

- a) Final Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor. Dept. of Energy March 1999, Volume 1
- b) National Institute of Occupational Safety and Health Pocket Guide to Hazardous Chemicals.
- c) Handbook of Dangerous Materials. Irving Sax
- d) Some National Institute of Occupational Safety and Health Profiles on various chemicals
- e) Toxicological Profile for Uranium
 - " " " Plutonium
 - " " " Lead
 - " " " Mercury

These are by ATSDR (Agency for Toxic Substances and Disease Registry - US Public Health Service) Contractors, they are frequently sorely lacking in many areas.

- f) "The Sunshine Problem", Article, Harpers Magazine reprint of declassified discussion with Atomic Energy Commission people on getting dead bodies to test.
- g) Medical Management of Radiological Casualties by the Military Medical Operations Office, Armed Forces Radiobiology Research Institute, Bethesda, Maryland, 1999 plus conversations with Lt. Col. Palmer.
- h) Worldwatch Institute, 1987 State of the World Report.
- i) Global Ecology Handbook
- j) The Web of Life, Fridjof Capra PhD.
- k) "Tellers War" - the Top Secret Story Behind the Star Wars deception." William Broad (won a Pulitzer Prize)
- l) Environmental Impact Statement on the Construction and Operation of a Mixed Oxide Fuel Fabrication Facility at the Savannah River (Nuclear) Site, South Carolina, Draft Report for comment. I had commented to the DOE/NRC on this outrageous idea prior to this Draft, and had pointed out, among other things, that the location they wanted to put the MOX facility over was full of soft soil zones/sinkholes. The Draft notes they changed the building orientation somewhat so it wouldn't disappear - or so they hope.

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- m) Various "MOX" fact sheets", put out by the companies involved in this scheme Duke, Cogema, Stone & Webster, including one entitled "The Team" in which it not only lists those foul companies Cogema, Framatome and the sick grand-daddy of them all, Belgonuclaire - Société Belge pour l'Industrie Nucléaire - but NFS too, and says : "Nuclear Fuel Services Inc. (NFS) has a 40 year history in the manufacture and service of highly enriched uranium and plutonium fuels. NFS brings specific expertise in safeguards, security and decontamination and decommissioning." WHAT ? Do they mean the same NFS that left behind the huge contaminated mess at West Valley, NY ? Do they mean NFS, Erwin TN that blew contaminated air from a controlled process area into a non-controlled clean area for about a week ? Or the NFS, Erwin, TN that had the flash fire and explosion in tray dissolver 7 in the highly enriched uranium recovery facility causing equipment damage and elevated contamination ? Or is it some other NFS that only exists in imagination ? (By the way, did they ever actually pay that \$ 37,000 fine ?)
- n) Biological Effects of Ionizing Radiation , number Five (BEIR V) National Academy of Sciences.
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- o) I knew some of what BEIR VII had had proposed, and in hindsight rightly estimated it would include the fact that no level of ionizing radiation exists , no threshold of exposure exists, below which low levels of radiation are harmless, which of course it did, however I used other sources for my documentation - but that fact stands.
- p) Article "Tsunami, mangroves and the market economy", Devinder Sharma, Synthesis Spring 2005
- q) Volume, "North American Wildlife" section on mangrove swamps.
- r) "Dead or Alive" the Endangered Species Act and list of over 600 endangered species. National Geographic, March 1995
- s) "When Public Health and the nuclear industry collide" by Brian Jacobs, Greenpeace Magazine, July/Aug 1988
- t) Environmental Protection Agency's Toxic Release Inventory (TRI)
- u) "A debt long overdue" by Michael Flynn, in the Bulletin of the Atomic Scientists, July/August, 2001
- v) "The Sites" same issue of the Bulletin of Atomic Scientists, showing sites covered by the Energy Employees Occupational Illness Compensation Act of 2000, published by the DOE. The NFS Erwin site is listed as W.R. Grace, Erwin, TN, and of course the USEC Paducah Kentucky and Portsmouth Ohio sites are on it also.
- w) "Burden of Proof" by Arjun Makhijani in the same Bulletin of Atomic Scientists issue.
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- x) ~~4~~ Volume DOE Yucca Mountain Documents for a "Geologic repository for the disposal of spent fuel and high level waste at Yucca Mountain, Nye County, Nevada" which includes the Science and Engineering Report and the EIS's and arrives in a box 8 inches high, which is the height of the volumes, approx. (Tip: when reading it, schedule a break every 15 minutes, that allows the reader to go outside and scream in frustration about the system and industry that led to the report- let alone the report.)
- y) Some of the Savannah River Nuclear Site documents on contamination etc, which arrive in a box weighing about 25 pounds - includes some effects to birds and wildlife contamination. Many Savannah River Nuclear Site yearly reports, site overflights showing every blade of grass basically contaminated Savannah River Site reports are tailored to public consumption and everything (as bad as it is) is downplayed, so that the Dose Reconstruction Project (for the government) which had to be done to establish what REALLY was released, had a top author/project overseer, who told me those reports were not being used (as they were not useful, they played down contamination)
- z) "Silent Spring" Rachel Carson (Good, forty years on, for the concerns then on the synergistic effects between pesticides/toxic chemicals/radiation)

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- a 1) Nuclear Fuel Services overflights (to measure radiation)
- b 1) National Geographic, July 2002, Nuclear Waste article, spectacular photo of United States Enrichment Cops. Paducah Gaseous Diffusion Enrichment plant from the air - a double page spread - showing the thousands and thousands of ghastly cylinders of U-hex (depleted) 36,000 to be precise, multitudes in visibly terrible condition, plus theres one of TMI from the air with a ridiculous caption (the standard "release was minimal" mantra) and in the text NRC's Deligatti shrugging in connection with 1961 standards for cask temperatures being used -you sort of have to read it.
- c 1) "A Path Where No Man Thought" DCarl Sagan and Richard Turco
- d 1) "The Fate of the Earth" Jonothan Schell
- e 1) "The Chernobyl Disaster" Victor Haynes and Marco Bojcun
- f 1) "A Safety and Regulatory Assessment of Generic BWR and PWR Permanently shutdown nuclear power plants" Brookhaven National Lab (for the NRC) Aug. 1997. Appendix B is bad, contains some wrong comments in it. However, a statement in the volume says that (because no one knows what to do with it etc) spent fuel is expected to remain on site for an indefinite period of time.
That makes my point, that it is unconscionable to allow plants to keep operating and creating more to be stuck outside or in the pools.
- g 1) Committee on Interior and Insular Affairs, US House of Representatives, Washington, DC Nov. 1. 1982, Subcommittee on Oversight and Investigations, Calculation of Reactor Accident Consequences (CRAC 2) for US Nuclear Power Plants, Health Effects and Costs, Conditional on an "SSTI" Release. With 4¹/₂ pages of footnotes, which includes information like if all the resources of all the hospitals in the entire nation were mobilized, one could perhaps save 2,500 out of the tens of thousands who'd die etc.
- h 1) Wall St. Journal editorial on MOX/Pu "Playing with Plutonium", Oct. 2, 2002.
- I 1) Dec. 1st 2003 News release from Congressman Markeys office on the GAO report showing 42 nuclear plants lack sufficient funds to clean up after shutting down and NRC ineffective in monitoring decommissioning funds. Worst offenders were Exelon and the TVA. Those affected in my petition include Quad Cities, Duane Arnold, Pilgrim, Fermi, Monticello, Grand Gulf, Salem, Nine Mile Point, Brunswick, Peach Bottom, TMI, Catawba, Limerick. Please add any I omitted to from main Petition text.
- J 1) Hisham Zeriffi PhD., "Tritium : The Environmental, Health, Budgetary and Strategic effects of DOE's decision to produce Tritium". 1996, from IEER.
- K1) Three Mile Island , "The Peoples Testament" Aileen M. Smith Katagiri and Mitsuri Katagiri (Excerpts from 250 interviews with residents near TMI)
- L1) TVA Office of Inspector General Report of Administrative Inquiry on Sequoyah Employee Misconduct. The so-called "Ice-Babies" report.
- ~~M1)~~ "Public-Health-Risks-of-using-MOX-at-Duke-Nuclear-Powers-Catawba-and-McGuire-Ice-Condensers" by Edwin Lyman PhD. Nuclear Control Institute, which quotes the NRC as saying in Nureg/CR 6427 April 2000 as "Ice condenser Plants are at least 2 orders of magnitude (100 x) more vulnerable to early containment failure than other types of PWRs."
- N 1) United States Geological Survey top maps and discussion with USGS re: aquifers. Various reports on aquifers and groundwater.
- O 1) DOE paper on Strontium effects on fish , in my memory from years ago.
- P 1) My own testimony to the DOE May 31st, 1990 on the continued operation of K,L and P reactors at Savannah River Nuclear Site and on the Draft EIS. My Comments (against) are in the DOE's FEIS, Volume II (along with those of the founding father of Radiological Health Physics, Dr. Karl Z. Morgan, who I know.)
- Q 1) a CDC Document entitled "For Administrative Use, Limited Distribution, Not for Publication. Gncer risks in a Rural Community with a Nuclear Facility Unicoi County,TN" Aug. 28th, 1979. And an article "Nuclear plant leaks waste, raises fear on cancer rate". by Joseph Albright April 30th Atlanta Journal-Constitution 1978
- R 1) "Lens opacities of children in Belarus affected by the Chernobyl accident." By

A.M. Arinchin and L.A. Ospannikova, Research Clinical Institute of Radiation Medicine and Endocrinology, Ministry of Health, Belarus.

"Monitoring of Cytogenetic Damages in Peripheral Lymphocytes in Children living in Radiocontaminated areas of Belarus " and "Study in Genetic Effects in Somatic Cells of Children living on the contaminated territories of Belarus." Both studies by Ludmilla S. Mikhalevich, Institute of Genetics and Cytology, Academy of Sciences of Belarus, Minsk.

- s 1) Conversation with Eugene Odom the year before he died, on the contamination of birds, waterfowl, animals, water etc. on the Savannah River Nuclear Site, and how they (at what is now called SREL, but formerly not) had not fully known what the AEC was up to inside what he termed "the industrial facilities" and the stupidity of the AEC (now DOE/NRC) putting those facilities on top of the important recharge area. (which is what would continue with the MOX and other facilities.)
- t 1) Many SREL documents, State documents etc.
- u 1) Newspaper articles on "Project Sapphire" (and NFS), other articles about NFS etc and Watts Bar, such as: "Nuclear uproar, Watts Bar endures 23 years of miscues, nears full power." by Jeffrey Fleischman, Aug. 7, 1996 AJ & C.
- v 1) "The Woman Who Knew Too Much - Dr. Alice Stewart and the Secrets of Radiation" by Gayle Green.
- w 1) Encyclopaedia Britannica article on Tsunamis, supplied by Mr. Russell Hoffman.
- x 1) World Scientists Warning to Humanity, Nov. 18, 1992, from 1,600 scientists from 72 countries, co-ordinated by Dr. Henry Way Kendall of the Union of Concerned Scientists. (Dr. Kendall has since died.)
- y 1) ATSDR/EPA Superfund site Paducah document and assessment, which leaves more than a great deal to be desired - and which gets trounced by the State of KY and others in the last section (partly because ATSDR has never seen a Superfund site it couldn't do a watered down report on, and as one State of Georgia official once said to me, words to the effect that unless there are dead bodies on the ground and mercury is pouring off the site etc. they'll say something like the cause for all the illness etc. is indeterminate) - the document contains some useful and horrendous information.
- z 1) Straume and Carsten on tritium radiobiology, quoted for example in "Nuclear dumps by the riverside" IEER as follows "...Both tritiated water and organically bound tritium can enter the fetus through the placenta. Animal studies have found that tritiated water has a greater average concentration in fetal tissues than maternal tissues, due to the relatively higher water content of the fetus. Organically bound tritium from food ingested by the mother also can be incorporated into fetal tissues... Considering that ova are formed once per lifetime during females' fetal development, the effects of radiation on the reproductive system of female fetuses and the possible effect of such radiation on the children of females irradiated in the womb could be significant....."
- a 2) "The effects of Nuclear Weapons" Samuel Glasstone Editor, by the US Dept. of Defense and the US Atomic Energy Commission 1962 (Bombs tested, for the most part were "small" by today's standards - therefore effects are often underestimated by far when trying to compare yield.)
- b 2) "Assessment of Potential Radiation Dose to Man from an acute tritium release into a forest ecosystem" By Watts and Murphy, Health Physics, Vol 35, Aug. 1978

and so ends my response to question 1.

An extra word on Paducah GDP, KY. It is my understanding that they want to ship some sort of terrible waste offsite, to a company called "Alaron", which that company would then dispose of somehow. Also that this company is in a run-down area, next to a rusty rail extension in a little industrial park, and seems particularly unsuited to get anything dangerous. The place is in a town called Wampun, PA right near a tributary to the Ohio I believe, so all runoff would go there. It is absurd to

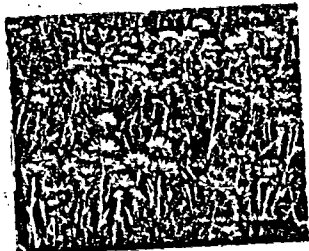
have Paducah sending their poisons to some seemingly depressed area, desperate for anything, but probably not educated to the dangers. Paducah should not be allowed to spread its mess far and wide for supposed decontamination. We have known over fifty years that there is nothing whatsoever that can be done to something radioactive, except contain it shielded from all life. If a contaminated surface is washed off, the wash water becomes radioactive and the surface still is but to a lesser extent, so now there is a contaminated surface, contaminated water, a contaminated sponge or mop, and a contaminated bucket. My point is, Some small place is going to wind up with a lot of radioactive/hazardous waste from Paducah. What will they do with it ? Chuck it in the nearest landfill ? It must not happen.

Anyway, this is the end of my response to NRC on the conference call question. NRC said it would be attached to the petition. It should be made part of all deliberations. With a broad background, the effects fall into a larger perspective on how the nation is at risk and contaminated from these facilities in my Petition in particular. My Petition should be granted. Please inform me when it will go in the Federal Register.

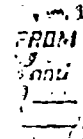
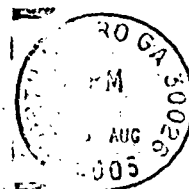
Thank you,

Pamela Blockey-O'Brien.

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