

BIOMEDICAL METATECHNOLOGY, INC.

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DOCKET NUMBER

PROPOSED RULE

PR-19,24,30 et al.
(50 FR 51992) (16)

DOCKETED
USNRC

86 FEB 26 PM 2:46

February 24, 1986

OFFICE OF
DOCKETING & SERVICE
BRANCH

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington DC 20555
Attention: Docketing and Service Branch

Sir:

The following comments on 10 CFR Parts 19 et al are submitted well in advance of the May 12, 1986 deadline to enable NRC to request documentation or clarification prior to that deadline. These comments are in the nature of a notification to you (and all other NRC staff involved in the promulgation of 10 CFR Parts 19 et al and its implementation):

All such persons may be held personally liable in civil and/or criminal actions involving disability or death that may result from exposures to the levels of ionizing radiation permitted in the standards cited above.

In brief, you are hereby notified of the following facts concerning the levels of exposure permitted in the above standards:

(1) The levels permitted are dangerous to human health and safety.

(2) Often they are at least 10 times higher than the dosage levels where excess morbidity has been detected.

(3) Definitive factual evidence establishing marked excess mortality at officially reported doses above 0.5 rem was released on June 4, 1986 (DOE/EV/01577).

(4) A comprehensive statistical analysis in my Congressional testimony on July 16, 1985 to a House subcommittee shows that about 500 excess deaths from exposure to fallout occurred in 3625 disease deaths of servicemen at atmospheric nuclear weapons tests.

(5) Since the 1950's, government-supported science ("Official Science") has participated with government agencies (e.g., AEC, DNA, DOE, NRC, etc.) in a conspiracy to cover-up the health hazards from exposures to low levels of ionizing radiation (e.g. fallout).

(6) When DOE/EV/01577 is correctly analysed it provides a corpus delicti for charges of criminally negligent homicide against the U.S. government officials responsible for the 500 deaths of U.S. servicemen. Hence the long-standing cover-up of low-level radiation hazards has now become a criminal conspiracy to conceal evidence of murder and other crimes by U.S. officials.

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(7) Since NRC actively participated in this cover-up, NRC is fully aware that the levels of exposure permitted in 10 CFR Parts 19 et al are hazardous to human health. Since 1978, numerous scientists (including several in Official Science) have testified to Congress that the 5 rem per year standard is a dangerous level. Indeed, from my private conversations with NRC staff it is clear some are aware of the danger and agree that there should be a drastic reduction in the permissible levels.

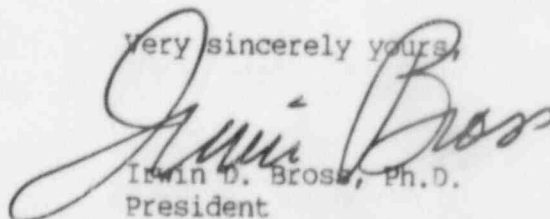
(8) NRC has the mission of protecting the public health and safety and in the revision of 10 CFR it had an opportunity to do so. Failure to do so therefore constitutes knowing and deliberate endangerment of the public health by NRC. This, in turn, represents a betrayal of the public trust by government officials.

(9) Consequently in the future, any individual involved in the promulgation of radiation standards which permit exposures to ionizing radiation known to be hazardous may be held personally accountable for any adverse health effects resulting from such permissible exposures. Any such person may be charged with criminally negligent homicide or be held personally liable for damages in civil suits for malicious malpractice.

(10) In addition, the continued participation of NRC staff in the cover up of the hazards of low-level ionizing radiation is shown by the false Official Science claims made in the January 9, 1986 Federal Register. This exposes them to the criminal charge of concealing evidence of murder and other wrongdoing by U.S. officials. I have recently asked for Attorney General Meese to appoint an Independent Counsel to investigate similar charges against the Secretary of Energy and the DOE staff. Perhaps this investigation could be extended to NRC.

Please note that NRC can purge itself of these charges by (1) immediately withdrawing the proposal for 10 CFR Parts 19 et al. and (2) by substituting a proposal that would make meaningful changes from a public health standpoint (e.g., drastic reductions, by a factor of 10 or more, in the permissible levels). Such changes must be made before there could be adequate radiation protection and before NRC would meet its statutory obligations to the public and the public health.

Very sincerely yours,



Irwin D. Bros, Ph.D.

President

Biomedical Metatechnology Inc.