

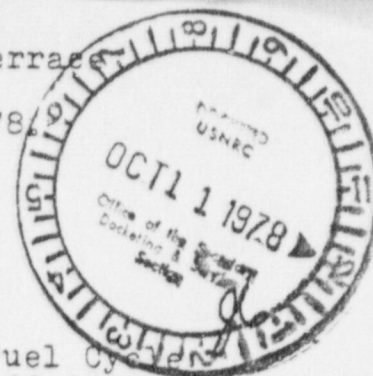
DOCKET NUMBER

APPROVED RULE

PR-51(43FR39801)

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29 September 1978

NRC PUBLIC DOCUMENT ROOM



John K. Lerahl  
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Washington, DC. 20555

Sir :

Mr William Thompson just sent me a copy of the Uranium Fuel Cycle Notice dated September 7, 1978. The notice has two cut-off dates, October 1 and 20, 1978. I am going to try to put into this letter my most pertinent comments on both areas. Omission of any particular point from this letter does not mean that I agree or disagree with the omitted subject. Omission merely denoted an unfairly short submission time.

First, I object vehemently to the entire summary on Page 39801. This summary makes the Commission notice of 14 April 1978 appear a bland and innocuous document. It was not.

Due to the efforts of Chauncey Kepford, Ph. D., Walter Jordan, Ph. D., Irwin Bross, Ph. D., Thomas Mancuso, M. D., and the participants in the Docket RM 50-3 Proceedings, the health effects due to the uranium fuel cycle were shown to be magnitudes greater than those admitted to by the nuclear utilities and the NRC. (Reference 1.) The Commission, then, put out the April 14 order which allowed the health effects to be treated separately. (2) Dr Chauncey Kepford immediately presented very damaging data on the Radon 222 problem. (2) Specifically, over 1,000,000 premature deaths of human beings would arise from the radon 222 released in the mining of uranium to fuel a 1000 megawatt reactor for one year's operation.

These numbers are not mathematical tricks or manipulations. They represent real people and real deaths. (3)

In the second paragraph of Page 38901, the Commission order of 14 April 1978 is again made to look innocuous. Again, I state the Order removed all health effects from the Table S3! This was not innocuous. It is deadly! It puts the entire area of health effects in limbo. Now that the information on health effects is finally coming out despite the disinterest of the NRC and the objections of the industry, the Commission Order of 14 April, the Perkins Hearings of June 8, 1978, and the subsequent sequestering of the June 8 Perkins Deposition, and the present rulemaking on the health effects in Table S 3 after health effects were deleted from Table S-3 by Commission Order is all a perfect example of government at its worst.

Include me as a participant in this third rate charade. Perhaps, I can only protect my life and the health of my countrymen with a typewriter. But as long as I can even do this, I shall.

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Acknowledged by card. 10/11

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Page 2, References.

1. Docket RM 50-3 Uranium Fuel Cycle . All submissions on Health Effects submitted before the Commissioner's Order cut health effects from consideration as part of this Docket.
2. Deposition of Dr. Chauncey Kepford in the consolidated Perkin's hearings on June 8, 1978 in NRC offices at Bethesda ,MD.
3. Rosalie Bertell, Ph.D., GNSH, Senior Research Scientist, Roswell Memorial Park Institute, Buffalo, NY.  
The Ethical Problems Involved in Nuclear Generation of Electricity.  
Address of May 13, 1978 , in Dublin ,Ireland.