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Chief, Rules and Directives Branch,  
Division of Administrative Services,  
Office of Administration,  
U.S. N.R.C.,  
Washington, DC 20555

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Rules and Directives Branch, 2003

Re: The Paducah Gaseous Diffusion Plant and United States Enrichment Corporation wishing to get a renewal of the certificate of compliance to continue to operate another five years.

The issuance of a certificate of compliance would be inimical to the common defense and security of the United States. A cursory look at the Docket for Paducah GDP shows that Bozo the Clown would do a better job operating this highly contaminated, dangerous facility, in all probability, - considering that United States Enrichment Corporation was hauled into a pre-decisional enforcement conference to discuss their apparent violations of NRC requirements FOR PROPER HANDLING OF CLASSIFIED INFORMATION, ten months after the Sept. 11th catastrophe; and considering that they have had buildup of uranyl oxyfluoride in one area, that exceeded safe mass by a few hundred pounds and did not verify, as required, that coolant pressure was greater than the building recirculating cooling water pressure each shift while the RCW was not drained, over a period of just under ten months, and considering that they conducted operations involving unsafe volume drums for storing seal parts, contaminated with uranium enriched to greater than 1.0 percent weight percent in uranium-235, without a documented nuclear criticality safety evaluation or approval for the drums, for nine months, as just a few examples of what goes on.

Furthermore, thousands upon thousands of cylinders of (radioactive, obviously) uranium hexafluoride are stored outside on-site, their deteriorating condition visible to the eye in aerial photos of them in National Geographic Magazine fairly recently - I suppose the DOE idea of slapping a coat of paint on them to make them look better is not working too well - and allowing this dump to continue operating will increase the amount of cylinders. The situation is a terrorists dream and the consequences of an attack, using various types of weaponry widely available to persons of that mindset, would be horrendous. Worse perhaps would be some type of air assault, by accident or design, which would not only cause cylinders to rupture etc. but cause a major fireball, leading to a conflagration impossible to extinguish due to the widespread chemical and other contamination on and off the site.

How can USEC justify putting their workers and the surrounding community - indeed people for hundreds of miles who would be affected by contaminant plumes containing Paducah Gaseous Diffusion Plants' contaminant list from hell - at such risk? There is no justification other than out of sheer greed on their part, as was the case since startup.

Speaking of greed, the money needs looking at. Under 76.35 (n) Certification of Gaseous Diffusion Plants there are meant to be funds set aside for ultimate disposal of "waste and depleted uranium, decontamination and decommissioning..." etc. WHERE IS THE MONEY? HOW MUCH IS IT? Considering that depleted uranium (i.e. uranium ~~xxxxxx~~ depleted in U-235, more precisely:

Depleted Uranium Isotopic Abundance (Atom %)	U-234	U-235	U-236	U-238
	0.0008	0.2015	0.0030	99.7947

Source Leonard A. Dietz, Former scientist at Knolls Atomic Power Lab, in "Alpha-Counting Method for Analyzing Depleted Uranium" Oct. 22, 1991, in Appendix 10 of "Uranium Battlefields Home and Abroad: Depleted Uranium Use by the U.S. Dept. of Defense", by Citizen Alert & Rural Alliance for Military Accountability". Dietz makes a notation that DU produced after 1983 might contain a different amount of U-236 or possibly none at all. As far as UF6 is concerned it still contains 40% of its original U-235.) Let me start again: Considering that Depleted uranium in

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terms of the U-238 component, has a half-life of 4.5 BILLION years and the radioactive daughter products it gives off range from radon gas to radioactive lead and more, — and considering that over the life of Paducah Gaseous Diffusion Plant the area got saturated with airborne emissions containing among other things radioactively contaminated nickel (20 million pounds smelted and cast), airborne lead emissions from smelting etc. of more than one million pounds of lead, approximately 120,000 pounds of uranium to air, vast amounts of fluorides (which cause everything from osteoporosis, severe skin damage, ulceration of mucous membranes, and it acts as a protoplasmic poison, besides causing emphysema, lesions in renal tubules, and lung edema) were also released including of course uranium hexafluoride, — considering all this, and the numerous on-site and offsite landfills full of poisons, the three mile long plume of TCE and technetium-99 spewing into the Ohio River, to be drunk at the next water intake, the plutonium-239 contamination on and off site, the deer with plutonium in them (NO, it's not from weapons testing), the contaminated ash piles contaminating creeks, considering all this, the question is, HOW MUCH MONEY HAVE THE BASTARDS THAT CREATED THIS NIGHT\* MARE PUT IN SPECIAL ACCOUNTS IN CASH, AND PERHAPS SOME IN GOLD IN CASE OF FUTURE PROBLEMS, to pay for containing and remediating the situation somewhat? The "PRBSs" meaning the Potentially Responsible Bastards, would include UNION CARBIDE, MARTIN MARIETTA, LOCKHEED MARTIN, AND UNITED STATES ENRICHMENT CORPORATION FOR ITS SHARE OF PROBLEMS AND VIOLATIONS. AND WHERE IS THE MONEY TO COMPENSATE THE SURROUNDING COMMUNITY FOR RUINING THEIR LIVES? WHERE IS THE MONEY FOR ALL THE SICK WORKERS?

What examination has there been of all underground piping and cable systems which the contaminants could have eaten away at?

Under 76.87 it appears the corporation was allowed to establish its own technical safety requirements. Since when does a polluter like USEC get to set its own standards? Why has NRC allowed this? There should be an Inspector General's investigation into how that got allowed. It is an outrage.

Are they still doing "midnight jetting/ midnight negative" releases out the vents on top of the buildings (of Uranium hexafluoride) illegally? How do we know they are not? Have these vents/jets been plugged? If not, why not?

Contamination will have affected the opposite banks of the Ohio River from where the major plumes are. where are tests for that? Is there a series of air monitors on that bank? If not, why not? There should be.

Has all the uranium etc. contaminated sediment been removed from the creeks and creek banks and river yet? If not, why not? Has the filthy, contaminated soil on site the poor workers have to trudge through while they toil at that place of death, been removed? I doubt it.

Has the C-746-A septic system— i.e. the sinks, showers, toilets, floor drains been decontaminated/removed? if not, why not?

Have the various burial grounds been contained and contaminants removed to a proper radioactive/hazardous waste containment site where possible? If not, why not?

Has the C-747-C "land farm" area and "burial yard" been cleaned up and the petroleum products, PCB's, uranium, TCE and 1,1,1,-TCA been removed to a radioactive/hazardous waste containment site? Are those who allowed the spreading of such contaminants to the soil, where anyone would realize it would all go to the water supply, been prosecuted? If not, why not?

As the airborne lead emissions will have gone onto the surrounding neighborhoods and have affected children (adults, pets, wildlife etc.) have all area children been tested for levels of lead in their blood at company expense? The maximum level in children should not be more than 10 ug/dL of blood (ten micrograms per deciliter of blood). What is the blood lead level of concern in children from the CDC, 1991, i.e. above that, the level is considered elevated. Have area adults been tested? If not, why not? (That would include past and current workers). Have area residents been tested for radioactive contamination of their persons, their homes, their gardens? Have workers been tested? If not, why not? Do workers in the area, and the public understand — or have they been told — that the so-called "allowable levels" of radioactive contamination were set historically/are set in order to enable the nuclear industrial complex to operate and have little to do with health?

Do they understand that the world has known since 1927 that ionizing radiation induces heritable mutations, due to the work of the great geneticist H.J. Muller? Are they aware that: "The proof exists, by any reasonable standard of biomedical proof, that there is no threshold-dose for radiation carcinogenesis. Thus, there is no dose-level or dose-rate for a population which is harmless." (Dr. John W. Gofman, Professor Emeritus of Molecular and Cell Biology, University of California at Berkeley. Ph.D in nuclear/physical chemistry with his dissertation on the discovery of Pa-232, U-232, Pa-233 and U-233, the proof that U-233 is fissionable by slow and fast neutrons, and discovery of the  $4n + 1$  radioactive series. Glenn Seaborg - who became Chairman of the Atomic Energy Commission 1961 -'71 - Raymond Stoughton and John Gofman share Patent # 3,123,535 on the fissionability of U-233. He also shares two patents on two processes for separating plutonium. He is also a MEDICAL doctor. He established the first Biomedical Research division at the Atomic Energy Commissions Livermore National Lab at AEC's request, for evaluating health effects of all types of nuclear activity. By 1969, he and colleague Arthur Tamplin, at Livermore, had concluded that human exposure to ionizing radiation was much more serious than previously recognized, and spoke out publicly against two AEC (now DOE/NRC) programs, one being Project Plowshare, a program to explode hundreds of nuclear bombs under the Rocky Mountains in order to liberate (radioactive) natural gas and to use nuclear explosives to excavate harbors and canals - (déjà vu - the military wants nuclear bunker busting bombs now - idiocy repeating itself) and needless to say, the AEC was not pleased.)

I raise these issues because under 76.60 to have a Certification, under "(a) The Corporation shall provide for adequate protection of the public health and safety....")

- 1) Obviously neither the Corporation nor its predecessors have done that, and
- 2) it's impossible.

Under 76.85 Assessment of Accidents - there is nothing on God's green earth that can prevent the sort of catastrophe a new major earthquake on the New Madrid Fault would cause. The last one, after all, caused the Mississippi and the Ohio Rivers to temporarily flow backwards, and was felt from Boston to New Orleans. The ground rose and fell, and in western Tennessee sank to form Reelfoot Lake. Geologic spitting distance from Paducah. Although the Paducah Gaseous Diffusion Plant disappearing into an abyss would probably mess up United States Enrichment Corporation's stock market value, about which most people would be delighted considering what they profit from - the tragedy would be effects to workers, and the surrounding community, whether or not it went into an abyss, as due to the age of the dump, and the problems on the Docket, plus the vast amounts of Uranium Hexafluoride on site, consequences would involve every disaster scenario imaginable. And nothing could be done about it as those approaching to help would die. Same applies to a terrorist attack on the site. There would be no possible help for ages.

For all these and many other reasons time and ill health does not permit me to go into, it would be sinful, wicked, to give this outfit USEC, a Certificate of Compliance for Paducah Gaseous Diffusion Plant - or its "neighbor" plant the Portsmouth Gaseous Diffusion Plant in Ohio with similar concerns -. In the event of a catastrophic accident or terrorist attack, depending on weather and wind patterns and speeds at the time, people could be affected in many states, and Kentucky would be in utter ruin across a sizeable part of it. The contamination of the river would be truly disastrous. As it is, it defies belief that it is still operating; it defies belief that people are allowed to work there, it defies belief that the Western Kentucky Wildlife Management area is not totally fenced, with no access allowed considering the vast contamination, and has not been cleaned up; and it is truly mindnumbing to find out, that there are three schools near this radioactive, fluoride saturated, and other chemical contaminated, monster of a facility.

The year 2000 Toxic Release Inventory, listed USEC had released 59,700 pounds of hydrochloric acid out the stack, and could hold up to almost 10 million pounds of dichlorotetrafluoroethane on site and released 379,000 pounds of it out to the air. Nothing like releasing crap that can cause cardiac arrest, asphyxiation and cardiac arrhythmia or pulmonary edema, eye, skin and throat burns and bone changes out over your neighborhood schools. This is certainly not protecting public health.

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What is happening is the slow murder of workers and the surrounding community via radioactive contamination /damage to their gene pool and via chemical and other contamination. Such chemical releases probably kill birds, which would mean the plant violates the Migratory Bird Treaty Act - something all DOE facilities do. Birds also ingest radioactively contaminated foods and when they die, wherever they die, they leave a radioactive outline on the ground. It is not for nothing that the true name of the DOE is the Death Of the Earth squad. It is time this facility ceased operation, compensated workers and the surrounding community, gave workers and their families health insurance for life, free, and contained the mess. A place this contaminated can never be "decommissioned" (a euphemism for "walking away from the problem") and must always have institutional controls in place, no public access in perpetuity, proper containment, cleanup and remediation done to lower dangers, and a 24 hour security system forever to guarantee people stay away. Also, the NRC must never grant a license or a Certificate to any other facility of this type in the future.

And the NRC needs to find out how long it will take to reach equilibrium after shutdown of the plant due to accident or because it must be closed. Is it two years? Finally, how much insurance do they carry? It would have to be in the billions. I doubt they can purchase it. Also, when was the last time they carried out an emergency evacuation of the plant and a ten mile radius of the site, as a drill? If it has not been done, why not? When will it be done? It should be as realistic as possible with no one able to come and help and everyone clogging the roads trying to get out. Even shutdown, the place will be dangerous for decades, so a drill is in order.

NRC will doubtless receive pressure to keep this dump open. Were this plant in the former Soviet Union, everyone would be writing huge articles about how awful it is. Because it is over here, people do not want to believe this nightmare could have been allowed to happen. Well it did, and the NRC must not allow it to continue. For the sake of all those children nearby in particular, NRC must deny the Certificate and get that radioactive monstrosity shutdown. Not to do so would be wicked and malevolent in view of all the aforementioned.

Think of those children. Seize the day. Deny the Certificate. It's the right thing to do.

Thank you.

Pamela Blockey-O'Brien.

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