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ADJUDICATIONS STAFF

**Docket Nos. 50-413/414-OLA**

**RAS 7929**

**From:** "E.M.T. O'Nan" <pace@mcdowell.main.nc.us>  
**To:** <hearingdocket@nrc.gov>  
**Date:** Mon, Jun 14, 2004 4:45 PM  
**Subject:** hearing to determine an amendment to the operating license for Catawba Nuclear Station

Office of the Secretary  
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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
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To Whom It May Concern,

My name is Elizabeth O'Nan. I serve as the director of Protect All Children's Environment, an all volunteer organization offering support to the chemically injured and disabled. As such we represent many individuals that have died and been disabled and injured by our governments failure to properly regulate various toxic chemicals and materials. Radiation is far from the least damaging material. It very much appears that the activities and decisions of this commission are likely to add greatly to our duties. It is in the hopes that you will employ a far more precautionary approach to regulating this industry and do your duty to protect American citizens and environment from additional damage that we encourage you to reject Duke Power's request to amend the operating license for its Catawba Nuclear Station to allow the use of four mixed oxide (MOX) lead test assemblies at the station.

As revealed in Rachel Carson's book, "Silent Spring", her primary fear was the mixture of radiation with pesticides and other chemicals. Currently one third of the American population is chronically ill or disabled. Our healthcare burden is staggering both in terms of pain and suffering and financial costs. We are now living the reality of what Rachel Carson termed, "the not quite lethal existence". This is your opportunity to prevent further degeneration of American health and environment for as the

saying goes, "If you are not part of the solution, you ARE part of the problem." In this case your decisions could contribute a large part of the problem. I wish that I could be present at the hearing to share these thoughts with you. However, my health is so deteriorated that I am no longer able to attend to these hearings as I would like. I often request speakerphone access to speak to such committees as these, but I did not know to whom to apply for these services on this occasion. I hope that in the future that disability access can be made available for those too injured by previous decisions to attend current public hearings.

We the victims of runaway, insufficiently regulated industry implore you to do your duty and protect us from the unnecessary sacrifice of what is left of our health. Please respond as soon as possible with your decision. I include for your information some information that was provided by the Blue Ridge Environmental Defense League as well as a study, "Societal Costs of Exposure to Toxic Substances".

Sincerely,  
Elizabeth O'Nan

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Earlier this year, BREDL presented safety concerns about plutonium fuel raised by French scientists in that nation's reactors. The IRSN (Institut de Radioprotection et de Surete Nucleaire) determined that plutonium fuel rods, also known as MOX, fail at far lower temperatures, 400-570 degrees-F lower, than traditional uranium fuel rods. Also, the metal sheath, or cladding, which holds the fuel rod together may form balloons which would block cooling water, leading to an uncontrolled core meltdown. BREDL previously submitted expert testimony by Dr. Edwin Lyman on the dangers of both the plutonium fuel program in general and the reactors at Catawba in particular. For more information, go to [www.BREDL.org](http://www.BREDL.org) , email [BREDL@skybest.com](mailto:BREDL@skybest.com), or call (336) 982-2691.

Excerpt from the Atomic Safety and Licensing Board's Memorandum and Order:

[T]his proceeding involves certain challenges of BREDL to Duke's request to

amend the operating license for its Catawba Nuclear Station to allow the use of four mixed oxide (MOX) lead test assemblies at the station. (MOX fuel contains a mixture of plutonium and uranium oxides, with plutonium providing the primary fissile isotopes; Duke has submitted its request as part of the ongoing U.S.-Russian Federation plutonium disposition program, a nuclear nonproliferation program to dispose of surplus plutonium from nuclear weapons by converting the material into MOX fuel and using that fuel in nuclear reactors.) On September 17, 2003, this Licensing Board was established to preside over this proceeding. 68 Fed. Reg. 55,414 (Sept. 25, 2003). By Memoranda and Orders dated March 5 and April 12, 2004 (the latter sealed as Safeguards Information; redacted version issued May 28, 2004), the Licensing Board granted BREDL's request for hearing and admitted various non-security-related and security-related contentions. LBP-04-04, 59 NRC \_\_\_ (2004); LBP-04-10, 59 NRC \_\_\_ (2004).

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Publications

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Societal Costs of Exposure to Toxic Substances: Economic and Health Costs of Four Case Studies That Are Candidates for Environmental Causation

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Full Article

Full Article in PDFAbstract

Four outcomes that evidence suggests are candidates for "environmental causation" were chosen for analysis: diabetes, Parkinson's disease (PD), neurodevelopmental effects and hypothyroidism, and deficits in intelligence quotient (IQ). These are an enormous burden in the United States, Canada, and other industrial countries. We review findings on actual social and economic costs, construct estimates of some of the costs from pertinent sources, and provide several hypothetical examples consistent with published evidence. Many detailed costs are estimated, but these are fragmented and missing in coverage and jurisdiction. Nonetheless, the cumulative costs identified are very large, totaling \$568 billion to \$793 billion per year for Canada and the United States combined. Partial Canadian costs alone are \$46 billion to \$52 billion per year. Specifics include diabetes (United States and Canada), \$128 billion per year; PD in the United States, \$13 billion to \$28.5 billion per year; neurodevelopmental deficits and hypothyroidism are endemic and, including estimates of costs of childhood disorders that evidence suggests are linked, amount to \$81.5 billion to \$167

billion per year for the United States and \$2 billion per year in Ontario; loss of 5 IQ points cost \$30 billion per year in Canada and \$275 billion to \$326 billion per year in the United States; and hypothetical dynamic economic impacts cost another \$19 billion to \$92 billion per year for the United States and Canada combined. Reasoned arguments based on the weight of evidence can support the hypothesis that at least 10%, up to 50% of these costs are environmentally induced--between \$57 billion and \$397 billion per year. Key words: diabetes, environmental disease, healthcare, hypothyroidism, IQ loss, neurodevelopmental deficits, Parkinson's disease, societal and economic costs. -- Environ Health Perspect 109(suppl 6):885-903 (2001).  
<http://ehpnet1.niehs.nih.gov/docs/2001/suppl-6/885-903muir/abstract.html>

This article is based on a presentation at the Workshop on Methodologies for Community Health Assessment in Areas of Concern held 4-5 October 2000 in Windsor, Ontario, Canada.

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We are indebted to the International Joint Commission Science Advisory Board for the workshop; D. Welland, McMaster University, for advice and manuscript review; J. Rovet, Hospital for Sick Children, Toronto, for advice and assistance in the revision of the hypothyroidism section; and two anonymous referees for critical comments.

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