From: Sunny Miller <sunny@traprockpeace.org>
To: <rle@nrc.gov>
Date: 03/07/2007 3:22:32 AM
Subject: War and hazards at the Vernon reactor/ EIS Scoping Comments

To Mr. Richard Emch, Jr.
Senior Project Manager
Environmental Branch B
Division of License Renewal
Office of Nuclear reactor Regulation
ON THE DUE DATE FOR COMMENTS:

12/21/04
71FR 76704
(15)

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RULES AND DIRECTIVES BRANCH USNRC

Dear Mr. Emch:
Can you please submit my comments on the proper form for full consideration by the NRC's proper staff and committees?

As we work to prevent a war with Iran that could go nuclear, please provide this help.

I comment on behalf of Traprock Peace Center, 103A Keets Rd, Deerfield, MA 01342, and on behalf of any and all off-spring of all my/your/our friends and relations.

Best regards,
Sunny Miller, 413-773-7427

http://www.TraprockPeace.org

Dear Comment on E.I.S. for Vermont Yankee Nuclear Reactor License Non-Renewal.
Please extend and revise my remarks submitted at 11:59pm, Tuesday, March 6.

The density of the nrc.gov web site obscures easy ways to comment on this 20-year "license renewal process". My work to stop the impending war with Iran, and to deter US plans regarding on how to bomb Iran's nuclear reactors near Natanz and Estafan leave me little time to comment on my hopes that our local nuclear threat will not become a target for our world neighbors outraged by the willingness of US citizens to put profits before civility and moral certitude--as plans to attack Iran proceed unchecked.

1. Regarding License Renewal and Its Processes
It is clear that the title given naming these discussions as "License Renewal" is prejudicial. In all future references, let's agree to name deliberations and comments as related to Vermont Yankee Nuclear's License Renewal/Non-renewal.

Today the deadline for remarks coincides with Town Meeting in Vermont. Please submit a Freedom of Information Act request on our behalf asking for all discussions on the timing of these

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Add = R. Emch (RLE)

deliberations.

2. Regarding NRC Hearing Process
The hearing process provided poor lighting for citizens reading comments, and fine lighting for judges sitting on the stage with no other role than listening. Placing the judges with chairs, and white tablecloths, and citizens standing with no support surface or podium for documents show a literal lack of support for citizen input.

Please investigate the rate of promotion for NRC staff who object to prevailing NRC processes. Please report on the harassment previously dished out to whistle-blowers and the support currently offered to all NRC and Vermont Yankee staff whose opinion has differed regarding Environmental Impact and risk assessment in the past 40 year period, and extrapolate the likely promotion and severance rate during the future 40-year period. Please conduct follow-up interviews with any five with the courage to disagree, including Bob Pollard, bless his heart!
Please look in the mirror and see your hope and courage so needed in this global human family.

8. Regarding Threatened and Endangered Species
Humans are one of many Threatened and Endangered Species. Long ago U.S. Representative Ron Dellums of California found documentation, revealed through a Freedom of Information Act (FIOA) inquiry, that the construction of civilian nuclear power reactors was promoted by a federal government explicitly interested in reprocessing the
spent fuel for weapons production uses, contrary to public relations messages at the time promoting prosperity, in familiar phrases like, "too cheap to meter". If I'm remembering correctly, reprocessing proved to be too dirty at West Valley to continue, so this reactor will not provide weapons-grade plutonium in the immediate future.

However during a time of war, and especially as the federal government conducts illegal and aggressive warfare, we can expect retaliation. The existence of this reactor threatens our continued existence. To close nuclear reactors as their life-expectancy diminishes is appropriate. Don't put this reactor on life-support. See #11 regarding better investments of US taxpayer dollars.

Is this concern outside the appropriate scope of environmental review? Of course not. I'm concerned that the predominantly male staff of the Nuclear Regulatory Commission is handicapped regarding assessments that need to be made with a broad view. In our culture men tend toward focused work, and women tend toward relational work. Focus is wonderful but it can lead to a preference for overlooking the big picture, in favor of
specific aspects that can be quantified. How can you measure the benefits of contributing federal funding toward the production of decentralized and locally owned power sources, rather than to centralized

operation vulnerable to one accident or one attack? The comparably narrow
benefits to continuing the production of tons of radioactive wastes can be
understood in a broad way, but I doubt they can be readily quantified.

We assert this broad understanding: Nuclear waste piles are likely targets in a time of war. We need you to report this reality to all levels of government by asserting this in your findings. We need you to report that the radioactive contamination that would result from an attack on the spent fuel pool and an ensuing fire lasting from one to three months would threaten all species living down-wind in New England and beyond. If your colleagues refuse to report this finding, you must dissent publicly.

9. Regarding Surface-Water Quality, Hydrology, and Use:
The surface hydrology at teh Vernon reactor shows nine of ten storm drains with no monitors for radioactive or chemical run-off into the CT. River watershed. Massachusetts Commonwealth efforts to reestablish Salmon spawning in the watershed are likely to be damaged by operations at the Vernon reactor.

10. Regarding Human Health:
Human health standards continue to reflect the adult-male bias of the regulators. The acutely increased vulnerabilities of the young child, the adolescent, the elder and even greater vulnerabilities of the sperm and egg of all living creatures require a reevaluation.

I request each inspector and each judge, each evaluator and each NRC Commissioner to spend an eight hour period with one person suffering genetic damage, whether Downs' Syndrome, or autism, and one eight-hour period comparing the lifestyles of corporate the Entergy Nuclear managers or owners of Entergy Nuclear stock with someone suffering an immune deficiency disease or cancer in Hindsdale or Whitingham, New Hampshire; or Gill or Orange, Massachusetts.

11. Regarding Socioeconomics:
I request that April first or second be the date for these thorough, first-hand
exposures to the degradation of human creativity and productivity that may be resulting from airborne effluents. This will not be a conclusive analysis, but it will begin to show you why so many neighbors down-wind of this reactor challenge continued operations. I request that April third be the date for reflection in poetry of those contrasts, because numbers can't quantify the losses we would suffer in 40 more years of operations. Who among you is brave enough to publish poems?

Being up close and personal with neighbors will elevate our questions. You will share our questions (not conclusions) about human health, and real questioning will help you all to reexamine the inherent inequality dished out in benefits gained and losses suffered.

It is obvious that thorough assessment will consider and report on differing reviews regarding human factors relevant for environmental protection for the length of time needed for isolating wastes produced in a twenty year period, not the environmental protection needed in a twenty year period. If waste disposal for wind mills proves far less costly or if views differ substantially on this point, your conclusion must deny the request for operations past the recommended term at the Vernon reactor.

13. Regarding Uranium Fuel Cycle and Waste Management: Please assess levels of cancer, heart disease, genetic damage to off-spring among workers and family members engaged in mining, refinement, and transportation of uranium.

Please assess training and compliance at the nuclear laundry facilities in Indian Orchard, Massachusetts near Springfield. About twelve years ago workers there spoke little English and no training about the radioactive hazard was given in Portuguese, their native language. Laundry workers would eat in work areas, or even put chewing gum on the table and later chew it again, demonstrating their lack of understanding of the hazard. Wes Blixt of the Springfield Union News investigated there. Neighbors of this facility complained of a high cancer rate, though the population of this suburb is too small to find numerical significance. I remember Stacia Falkowski lived there. I hope she is still living.

Please report whether "dilution is the solution". Is that laundry facility and are other contractors involved with handling the Vernon reactor's wastes holding pollution and mixing water in, to achieve dilution that will comply with federal, state or commonwealth environmental standards?

Please assess quality of life indicators for persons living downwind of the uranium mines.

Please assess the cost effectiveness of waste storage operations at Padukah, Kentucky for the next several hundred thousand years.

As our public servants, please use freedom of information act inquiries independently conducted site visits, recorded interviews and anonymous interviews as necessary to paint clear pictures of what our future in New England will look like, if your collective findings and/or your personal recommendations are true, and if they are in error; if they prevail. or if human factors or acts of nature defy your predictions.

WE REQUIRE THAT YOU INCLUDE DIVERGENT VIEWS WITHIN YOUR AGENCY'S RESPONSE.

WE COMMEND YOUR HARD WORK AND WILLINGNESS TO LOOK BOTH CLOSELY AND BROADLY AT THESE ISSUES AND CONCERNS.

PS: Please post the following comments in the files you publish as outside the scope of your review process. i count them as socioeconomic concerns.

15. Outside the Scope of Environmental Assessment:

The vulnerability of reactors to attack

Recently a visitor from Hiroshima spoke to neighbors gathered by Traprock Peace Centerin Greenfield, MA at Cafe Koko, February 24, 2007, to honor peace walkers traversing the state on the sixth annual "Walk for a New Spring" initiated by the New England Peace Pagoda. Steve Leeper, who flew from Atlanta to speak with us, said that between Iran's two nuclear reactors (now in the cross-hairs of US and Israeli aircraft and missiles-- some approaching and some poised to strike) sits the small city of Estafan. (Perhaps that is sometimes also spelled Estefan.) Estafan would be downwind of devastated Iranian reactor sites. I hear that already Israel has permission to cross the air space of Jordan, Kuwait, etc. How ironic that Estafan has a large Jewish population. But of course, there were American prisoners of war in Hiroshima, too, when it was bombed. Mighty military industrial machineries of war see shadowy outlines in the cross-hairs. Machines don't detect the beauty of life,which we hold sacred.

Please take our concerns about the Vernon reactor's vulnerability to attack seriously. Hiroshima was attacked. Nagasaki was attacked. Nevada test sites and the Bikini atoll were attacked. The test range used by the Soviets was attacked. Massachusetts' taxpayers will fork over $480.4 million this year for nuclear weapons and war, according the National Priorities Project, http://www.nationalpriorities.org

Sooner or later we are likely to get what we pay for.

How is this most likely to come about?

Our concerns are not fears dreamt in delusion.

Rather, confidence that these concerns are irrelevant would be a delusion. I submit the following text extracted from a report on the internet to remind you how closely knit we are, globally. It quotes the only Jewish Representative in Iran's national assembly. Please help quench the fires of war that rage through our national treasury, burning, turning the fruits of our collective labors from a harvest to a torment -- turning our thirst for life into an addiction to power.

Here is one likely scenario.

The depleted uranium harming those breathing residues in Iraq, Afghanistan, the Balkans, and at our many test sites and production sites is not irrelevant to continued operations of our reactors. Continued use will provoke retaliation in kind. Young boys see the tumor growths on their friends, some years

after their play on dusty vehicles of all sorts, destroyed by US pilots and soldiers using DU. Any airplane pilot can devastate the US economy by diving into a spent fuel pool.

Proper oversight requires a surprising shift in priorities. It requires that the NRC direct the industry to cease production of further radioactive wastes and work to secure all wastes, as well as possible, until the US Department of Defense returns to their sworn duty to protect and uphold the Constitution, rather than follow orders into illegal, aggressive wars. Our human family in Iran, our bankers in New England, all but the CEO's and some short-sighted stock-holders will be served if you will see the hand in glove relationship between the addiction to profits in the civilian reactor industry and addiction to profits and status in the military and nuclear industries.

http://www.zmag.org/content/showarticle.cfm?itemid=10491

' ... Mr Motamed represents Iran's 25,000-strong Jewish community, the largest such group in the Middle East outside Israel. Since 1906 Iran's constitution has guaranteed the Jewish community one seat in the Majlis. The Armenian, Assyrian and Zoroastrian minorities together hold a further four seats.

'Although he took on Mr Ahmadinejad about the Holocaust, Mr Motamed supports the president on other issues, including the standoff with the US, Europe and Israel over the country's nuclear programme. "I am an Iranian first and a Jew second," he said.

He acknowledged there were problems with being a Jew in Iran, as there were for the country's other minorities. But he said that Iran was relatively tolerant. "There is no pressure on the synagogues, no problems of desecration. I think the problem in Europe is worse than here. There is a lot of anti-semitism in other countries.'"

Extracted from "Iran's Jewish MP, by Ewan McAskill, Simon Tisdall, Robert Tait

Thank you, neighbor, for any insights about how to put out the fires of addiction to power and profit. Your efforts may be most effective if undertaken subtly. Or you may see a need for a dramatic nervous breakdown to extract yourself from complicity. We have much to learn together about how to end the nuclear age without further disaster.

There is more to say.

I hope that further comment will be considered.
Please advise. (We are in the TV studio taping during much of the day, but I will get messages by about 3:30.

Best regards,
Sunny Miller, 413-773-7427

Traprock Peace Center,
103A Keets Rd, Deerfield, MA 01342,

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From: Sunny Miller <sunny@traprockpeace.org>

Created By: sunny@traprockpeace.org

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