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Mr Secretary,

I do not believe, with TIME magazine (Oct 15, 1989), that the current Republican Jimmy Carter Government is a "bloated inefficient, helpless giant". Some of the current bureaucracy is much worse, useful when restrained, it has now become a loose cannon.

Now a consultant to the Nuclear Medicine group at St Mary's hospital in Tucson AZ, I have practiced Nuclear Medicine since 1948 and knew many of your predecessors in the AEC. I witnessed the deterioration of regulatory government after the great Cranberry Crisis of 1959. [I enclose a copy of my description of the 1959 event because, after reading Walkers's article in the JAMA last week, it is obvious that your flacks read history from Bible stories.] During the early years of AEC we needed regulators because so few physicians knew how to handle radioactivity and many thought low levels were dangerous.

Nuclear Medicine is now one of the most highly trained specialties, working in the most thoroughly researched science in history: low dose radiobiology. We now know that low dose radiation (e.g. nuclides in the diagnostic range) is hormetic, actually beneficial. An NRC (in the medical field) is no longer necessary. We no longer use health physicists to protect us, and our patients from radiation; we now hire "Radiation Regulatory Compliance Physicists" to protect us from NRC harassment.

Think back (≈1953) to the attempts your ilk made to enforce the use of shielded syringes for the IV injection of gamma emitters. I remember using the first specially made leaded-glass syringe on about 100 injections of Ga-72, I-131, & Au-198. Some of the first ring & wrist film badges proved that the dose to the "red bone marrow" of my hands was higher with the shield, than on a control series with a simple glass syringe. (Scatter and the time factor were involved, and it took extra effort to teach the instigators, Edith Quimby and KZ Morgan, that there is no red bone marrow in the hands.)

Think back (1965) to your banning the use of ^{99m}Tc for cisternography because it had caused a death. When the death proved to be based on a false newspaper headline you did not reverse the ban, you just forgot it. Or think back to 1968 when you were caught publishing a deliberate lie on the hazards of Hg-203 [M. Blau, J Nuc Med 1968]. Do you protest that this was before you hatched? Untrue! President Ford merely changed your name in 1975. He gave the same prolific clutch their own budget, and keys to the executive washroom.

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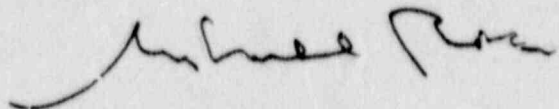
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Without the guiding hand of AEC your first opportunity to display incompetence came in 1979. You managed to turn a minor mechanical glitch at Three Mile Island into a major news farce. Seventeen curies of I-131 discharged into the atmosphere was enough for you to break out the KI, but the Mt St Helen unloading of 40 megacuries of radium daughters, about 10,000 times more radio-activity, over about 15 states was not even recognized.

I am now retired from the active practice of Nuclear Medicine, but I became aware of your revision of 10 CFR 35 when an editorial last year in the Health Physics Newsletter declared the revision uninterpretable gibberish that would lead to whimsical rule making. Editor John Tolan was prescient. I now learn from the Am College of Nuclear Physicians that your clerks have resumed the long distance practice of medicine by restricting nuclide use to NRC approved manufacturers instructions. Nothing new has ever come out of manufacturer's instructions, and you hereby declare science a finished study.

Your contention that you know all science became understandable when ScienceNewsletter revealed that the NRC \$100 million/year research budget has resulted in exactly 0 publications. In spite of this dedication to progress, you at least said that NRC policy was not to interfere with the practice of medicine. Your interference with nuclear power at Three Mile Island destroyed the nuclear power industry in the United States. Your current interference, dictating that no new procedure shall ever occur in nuclear medicine, takes the NRC beyond benign bureaucratic stupidity. The NRC is now a malevolent and ever present danger to American society.

The NRC could be called incompetent if it served any function in government; but it has no legitimate function. It is an arrogant collection of simpletons, useless to the people, inept in performance of its unnecessary functions, and a needless drain on the budget. I do not follow the wimpy leadership of the American College of Nuclear Physicians or the Society of Nuclear Medicine, in pleading for you to modify your imbecility. Rather, with a copy of this letter to my Senator and Congressman, I am pleading that the malignancy of the NRC be removed from the national government, and its spawn in state governments be expunged.



Marshall Bruce MD

enc; The Great Cranberry Crisis.
copies to Sen D.DeConcini & Rep J Kolbe,
with request to decommission the NRC.

THE GREAT CRANBERRY CRISIS

(Bureaucrats Learn How to Tap Fort Knox)

A great event in political science occurred just before the Thanksgiving holiday of 1959. The Food and Drug Administration (FDA) deliberately manufactured a major hysteria for political gain. It required a sustained confusion, and the unwitting collaboration of the news media, but FDA created the Great Cranberry Crisis of 1959 out of nothing to relieve its budgetary desires. Cranberries were taken off grocery store shelves because they contained a trace of aminotriazole, a weed-killer later shown to be a natural constituent of cranberry plants. It was a lesson to all bureaucrats: your budget can be doubled by manufacturing a "crisis".

A Real Crisis Requires Preparation.

In 1958 Congressman J. Delaney (D, NY) modified the Pure Food and Drug Act, and published his revision in the FEDERAL REGISTER (FR): IF CANCER DEVELOPS IN ANY ANIMAL FED ANY FOOD OR DRUG, IN ANY DOSE, FOR ANY TIME, THE SUBSTANCE MUST BE BANNED AND ITS MANUFACTURER DRAWN AND QUARTERED. Scientists in the bowels of the FDA, many with academic degrees in basket weaving, were stuffing the bellies of mice to test for Delaney carcinogens.

Any successful chemical was a candidate for testing. A highly successful weedkiller, aminotriazole, was known to have anti-thyroid activity in rats. The effect was easily tested. A massive dose of pure aminotriazole was rammed down a few rats' throats daily and, as expected, they all became hypothyroid.

The rats died weeks later of boredom, with little lumps in their thyroids. But in June 1959 one mouse developed a small thyroid cancer. The scientist informed his boss, who immediately notified his superior, who immediately called a committee to send a memo to the Deputy Assistant Secretary of the FDA. An ad-hoc committee was hastily organized to vitalize the Standing Committee on Research-in-Depth who went to the library. They found a book that said the offending weed-killer was used in the cranberry bogs of Massachusetts -- No, that state has powerful senators, better make it the bogs of Oregon.

How to Manufacture a Crisis

Thanksgiving was only 19 days off. To prevent a carnage of mass poisoning immediate action

was necessary. Thousands of FDA inspectors were alerted by emergency TWX. Then Secretary Fleming of the Dept of Health, Education, and Welfare was alerted. The Secretary briefed President Eisenhower on the third tee of Burning Tree. With Presidential approval he called a press conference and sounded the national tocsin: *We are in CRISIS!*

Monday, 9 November 1959: *"This is a warning not to buy either fresh or canned cranberries until further notice."*

[Chattanooga Daily Times]

Tuesday, 10 Nov 1959: *"...it is risky for humans to eat tainted berries...mice developed cancer of the thyroid."* Secretary Fleming revealed that one shipment of canned cranberries had been seized, but another had been distributed.

[Knoxville News-Sentinel]

Wednesday, 11 Nov: The Secretary advises *"...housewives be on the safe side by not buying cranberries...."* Women's pages of Chattanooga and Knoxville papers recommend stuffed peaches and curried apple halves for Thanksgiving. An AP dispatch from Albany, Oregon reported a million pounds of cranberries buried.

Thursday, 12 Nov: *"The scientist from the world's foremost agricultural experimental station said that he could see no reason why people should not eat cranberries."*

[Knoxville News-Sentinel]

Friday, 13 Nov: AP distributed pictures of Vice President Nixon helping himself to his fourth serving of cranberries. Presidential candidate Rockefeller had turkey a la Marco Polo with baked Alaska, but no cranberries. Senator J.F. Kennedy drank a toast with Massachusetts cranberry juice. Another load of Oregon cranberries was seized by the Welfare Department of California.

[AP, UPI]

Saturday, 14 Nov: AP reports another 39,000 lbs of Wisconsin berries seized, and Chicago banned the sale of all cranberries. [Chicago Daily News]

Monday, 16 Nov: President Eisenhower is asked to declare Oregon, Washington, Wisconsin, New Jersey, and Massachusetts economic disaster areas. The FDA announced that cranberries in warehouses of New Mexico, Colorado, Texas, and Utah were safe from the cancer causing weed-killer.

[Washington Post]

Tuesday, 17 Nov: HEW Secretary said most berries were not contaminated, and seized 25 cases of Wisconsin berries. [Washington Star]

Wednesday, 18 Nov: "Those who have eaten cranberries with less than 5 ppm aminotriazole should not be apprehensive", said a Tennessee State Chemist, but wanted all that stuff off the market. FDA, Denver, approved 150,492 lbs of canned cranberries. [AP, Rocky Mt News]

Thursday, 19 Nov: "The first batch of tainted cranberries from the 1958 crop turned up a few hours after the industry insisted that all berries from 1958 were safe." [Albuquerque Journal]
AP learned of HEW plan for abundant cranberries for Thanksgiving. All the house-wife has to do is look for safety label.

Friday, 20 Nov: "Labels for cranberries certified safe have been ordered", HEW Secretary tells UPI reporter.

Saturday, 21 Nov: HEW advises housewives in an AP release: Buy laboratory-approved Cranberries soon because they may run out.

Sunday, 22 Nov: HEW Secretary said if he were a housewife he would be "on the safe side and wouldn't buy any." [New York Times]

Wednesday, 25 Nov: On the three days before Thanksgiving, full-page advts feature turkeys, bananas, applesauce, beer, but no cranberries. The A&P 100th birthday special features everything except cranberries. But on this last day the A&P openly advertised the very brand that had been found tainted 9 Nov 1959.

THANKSGIVING DAY: UPI telephotos show Secretary Flemming eating a salad made from U.S. inspected cranberries. President Eisenhower is said to have substituted applesauce.

The Aftermath

A Week after Thanksgiving, SCIENCE, the weekly voice of the AM ASSOC FOR ADVANCE OF SCIENCE, editorialized under the title "Cranberry Smash": aminotriazole had been properly registered with the Dept of Agriculture for years as an economic poison. When used in cranberry ' ' too late in the growing season, small amounts were incorporated in the berries.

Tests showed that some rats fed a lifetime diet containing 100 ppm (parts per million) of aminotriazole developed thyroid adenocarcinomas; at 50 ppm, a few developed adenomas but no carcinomas. A lifetime diet of 1 ppm caused nothing.

In 1957 the FDA had 3½ million lbs of cranberries withdrawn from the market. Industry asked for a tolerance of 1 ppm -- denied. In 1958 the industry again petitioned for a 1 ppm tolerance. Again the FDA denied it, claiming misuse, but made no seizures. The SCIENCE editorial pointed out that it was hard to discuss the matter because the FDA had declared the test results "CONFIDENTIAL OFFICIAL SECRET, VITAL TO NATIONAL SECURITY".

Payment For the Crisis

According to a news item spiked by most newspapers, the FDA asked Congress for an increased budget the day after Thanksgiving. [AMA News, 30 Nov 1959] It was granted and a round of promotions for the staff celebrated the deception. Before 1958 the FDA had to prove a product harmful before seizure. After the Cranberry Crisis every chemical was guilty until proved safe. Secretary Flemming pointed out that his scientists could not prove any "safe" tolerance, therefore he wanted congressional authority to specify "safe" levels. [If this does not make sense, you're out of touch with bureaucracy.]

What makes the Great Cranberry Crisis a true landmark in history is that every branch of government learned that a cancer in a mouse means money in the budget. The mouse population in Washington DC doubled in one year. The FDA had already started an investigation of death and illness from coal tar colors used in lipstick. [AP, 20 Nov 1959] Charcoal was listed among the deadly food additives and charcoal-broiled steak faced bureau controls; even burnt toast was suspect. [AP, 29 Nov 1959] In March 1960 the US paid \$10 million in damages to cranberry growers. To mollify hurt feelings, cranberries became a big item in the free school-lunch program. The Army was instructed to buy more cranberries.

The Great Cranberry Crisis was officially over when the Governor of Massachusetts declared cranberry juice the Official State Drink. Then, Surgeon General Terry doubled his budget with a smoking mouse.