



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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JUL 23 1980

Dr. Joan K. Leavitt, Commissioner
Department of Health
State Department of Health Building
1000 Northeast 10th Street
P. O. Box 53551
Oklahoma City, Oklahoma 73152

Dear Dr. Leavitt:

We have received a letter dated May 5, 1980, from Kirke Malone of Oklahoma City. The letter, a copy of which is enclosed, makes a number of allegations concerning the competence of the Radiological Health Service of the Oklahoma State Department of Health.

This letter is relevant to the pending application by Public Service Company of Oklahoma for the Black Fox Station, Units 1 and 2, in that it deals with the emergency response planning for that facility and we have placed it in the appropriate public document rooms. A copy of our response, dated June 23, 1980, is enclosed. Please provide us with a copy of any response that you may make to the allegations.

Sincerely,

A handwritten signature in cursive script that reads "Harold R. Denton".

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
Letter from Kirke Malone
dated May 5, 1980

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1600 N.W. 16th
Oklahoma City, Oklahoma 73106
May 5, 1980

Dear Sir:

Tulsa and vicinity cannot risk a "3 Mile Island" without an adequate emergency plan for the Black Fox Nuclear Power Reactor.

In the course of a little detective work, I have learned that the Deputy Commissioner for Environmental Health and Supervisor of the Radiological Health Service of the Oklahoma State Department of Health has informed the Federal Department of Health, Education and Welfare that the Emergency Response Plan for the Black Fox Nuclear Reactor will, after 5 years work, be delayed another 7 years, that is, until 1987.

After long-term study of the Radiological Health Service, I have reached some conclusions:

1. The 12 years this governmental agency finds necessary to complete 2 years of work is due to the inadequate training and poor technical experience that the manpower of the agency possesses in matters of reactor radiation protection and management.
 - a. There is not a single
 - i) Certified Health Physicist, or
 - ii) Certified Radiological Physicist, or
 - iii) Registered Radiation Safety Consultanton the staff.
 - b. No one on the staff has professional experience with a nuclear reactor of significant size.
 - c. Management techniques such as those used in modern industrial organizations are generally unknown and totally rejected by this agency.
2. The top management of the service are incapable, lacking training and adequate experience in directing the development of an emergency response plan for the Black Fox Reactor.

While I am a pro-nuclear Okie, it is my professional opinion that the Black Fox Reactor should not be built until such time (1987?) as an adequate emergency response plan can be developed.

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I recommend that the responsibility for the emergency response plan be taken away from the Radiological Health Service and be placed with an independent, responsible, professional consulting firm. There are quite a few excellent radiation protection companies that could do a superior job. It is imperative that the work be done by Radiation Protection Specialists, not a general engineering consulting firm.

Taking this action would contribute to the safety of the citizens of the Tulsa Metro area, as well as to the safe development of nuclear power in Oklahoma.

After reading this letter to the State Commissioner of Health, she told me it was "totally inaccurate" and threatened me against making the letter public.

I can only urge you, before it is too late to:

1. Check the facts, and
2. Contact your representative.

Sincerely,

Kirke Malone

KIRKE MALONE

Registered Radiation Safety Consultant

Former Director for Emergency Planning
Plum Brook Reactor Facility
National Aeronautics and Space Administration