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Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D.C. 20555

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10CFR2.206 Appeal of Doug Gillman's Five Contentions
and Addendum

Attn: Atomic Safety and Licensing Appeal Board

With respect to the John H. Frye, III, Chairman,
Administrative Judge letter to me dated April 14, 1983,
good cause for delay involves many issues. The
state of knowledge about engineering problems involved
in the Zimmer Power Station - Unit 1 (ZPS-1) has
only developed significantly since October 24, 1976.
Looking through the Biological Effects of Ionizing
Radiation published by the United Nations, the
variety of usage of terms describing radiation effects
varies from paper to paper. One paper deals strictly
with rad, another strictly with rem, another
strictly with Roentgen, another strictly with kerma.
To date there is no uniformity of radiation standards
in measurement. From one manufacturer's measuring
instrument to the next, the measurement is only as
good as the existence of that measuring machine.
Any variation renders an entirely different measurement,
and there is no metallurgical quality control in
such instruments. The notion of 104 years being
the jurisdictional period of oversight over any
nuclear reactor installation raises the problem of
homesteading on sites containing radioactive debris.
To claim any problem in "time is of the essence"
in raising issues about some nuclear reactor becomes
absurd in terms of the longevity of radioactive emissions
over geological time which it is the intent of the
applicant and USNRC to ignore. This is a serious
contradiction. The state of biological knowledge
is truly a shambles. The concept of genetic
interdependency only being stated recently by
Waddington, Stern and Roche. The summary disposition
of major time effects of materials on biological
forms is also purely a threat to national security
because the common sense of the people will be assaulted
by dictatorial-like disposition of radiation-time
issues in bureaucratic-legalese short shrift to beat
the clock out of the office. This sort of petty
proceduralism, while attuned to the realities of

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administrative work, nevertheless exposes unwittingly the reality of serious vacuums in the scientific community in which the prestige and self-interest of academic strongholds over discoveries of work generating industrial outlays for glory, power and control have destroyed the actual realities of truth, validity and knowledge. All of these events occurring in a society governed by communications mobbing events, in which the daily procession of life is governed by hysteria generation by topologically unexamined information flow structures, and the self-interest of consumers, government, and business. In this climate of actual and sustained primitivism decisions are being dictated by fear-reactions to the inability to understand the longevity of hysteria generation. And so ironically, while there is great technological capability, it is being deployed, or more accurately, is resonating with the hysteria generation. There are still vast institutions claiming people without their understanding the difference between institutional identity and individual identity. The marketability of protoplasm has increased in such a society to the point where today there hardly exists any frighteningly absurd science fiction scenario which is not being implemented. The actual measure of this chaos is pictured by stockpiling protoplasm liquidation schemes by governments which will not exist after any such actuation. Thus time is of the essence in gaining a measure of perspective that to implement any biosphere poisoning scheme at any time becomes the vision or leadership that the next generation will accept.

The development of a sound record has serious epistemological problems if the issue under inspection is radiation. Radiation is known to be an aversive conditioning phenomenon in the laboratory. When radiation of the environment is selected for or deployed, this is the same as saying that it is desired to obliterate the continuity of human knowledge. The development of a sound record can only occur by maintaining that environment of natural background radiation. Any increase in the radiation will be speeding the protoplasmic transition to a new form, not necessarily any more free from hysteria, emotionalism, or institutional chattel schemes, than our present form. Furthermore, what is the sound record that the USNRC

is maintaining shall exist after 104 years? After 104 years will our children see sanctimonious, church, temple and mosque attending, sperm bank owners, pillars of their communities, buying radioactive sites to build schools to teach mosaic cloning of human cell lines? And won't they be speculating protoplasm up and down on margin as well? What is the sound record the USNRC claims will exist after 104 years?

The question of delaying the proceeding is simple. End the proceeding.

The five contentions as stated are clearly worded. In particular, however, Contention 5 may be restated as follows:

Contention 5

The ion exchange resin reactor coolant polishing system is a SAFETY-RELATED SYSTEM per inspection of the Three Mile Island -Unit 2 failure; the operations and the instrument, control and power cables relating to the ion exchange system at the Zimmer Power Station - Unit 1 are all SAFETY-RELATED SYSTEMS. (This contention recognizes that the ion exchange systems in a pressurized water reactor and a boiling water reactor are functionally the same.)

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