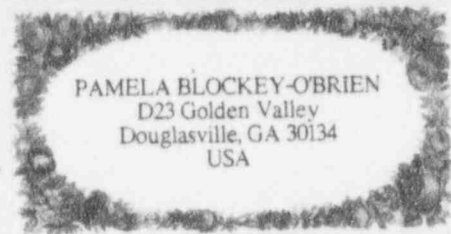


2 pages

REF: EDO 10598
Action: Russell, NRR
Cy: OGC



The Executive Director

U.S. Nuclear Regulatory Commission,
Washington, D.C. 20555

NRR RCD: 1/17/96
NRR ACTION: DRPM

cys to: Russell, Miraglia, Thadani
Zimmerman, Jan. 10th, 1996 Bohrer

Dear Director,

50-160

This letter is in regard to my "2.206 Petition under 10 CFR" and all the letters I have written NRC and The Atomic Safety and Li Licensing Board Judges in connection with the Petition and the Georgia Tech Neely Nuclear Research Reactor, and the radioactive contamination there, and violations, and the ALARA issue.

The NRC and myself and anyone with any detailed knowledge of the global nuclear mess we are in, knows that under NRC Rules, Part 20, "Standards for Protection against Radiation" that all phases of the nuclear cycle from transportation of radioactive materials to nuclear reactors, including the Tech dump of a reactor, operate under ALARA, which allows releases of radioactivity to air, soil and water on a continuous basis. "Planned deaths" in doc Doctor Gofman's words. We know there is no "safe level" of ionizing radiation. There is vast documentation to that effect. We know the so-called "acceptable levels" and "standards" were set to help the industry - a political decision, public health be damned. Mr. Mendonça summed it up best, when I was so upset I got into that huge argument with him/NRC when the Justices were last in Atlanta (and I here I want to say I am sorry I yelled at him and I think part of the problem is that women and men DO communicate and interpret things differently and that is a fact that has basis in science and psychology and is not a casual or anti-feminist comment) and and what Mr. Mendonça said at some point, in response to my outrage, was: "It's legal". And there you have it. Many of the terrible problems, are either legal, or not NRC jurisdiction, or not the States problem and on and on. The consequence is that no one will ACT. No one will stand up and say "this is a potentially catastrophic situation and we have to act to stop it."

However, a lot people should be ashamed at what has gone on and still goes on with regard to the Tech reactor situation, whether it is legal or not. Consider these FACTS:

NRC Inspection Reports, State of Georgia documents, and Nuclear Safety Committee Minutes show that beyond a shadow of a doubt the radioactive contamination, lack of monitoring, failures to perform radiation level and contamination surveys, leaks of radioactive materials, negligence, radioactive waste leaks, and a litany of appalling problems not just in the past year, but for years on end.

Specifically, I ask NRC to READ all inspection reports and notices of violation from 1987 up until this present date concerning this awful place. and to make note of the fact that in Inspection Report Number 50-160/95-01 dated June 21st, 1995, for example, when all those tests

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were run for the City of Atlanta at the sewage treatment plant, tests for tritium and cobalt-60 were not run -two prime contaminants in the tanks released to the sewers - despite the fact that tritium was found in the tanks at the reactor site. Furthermore, it is no wonder that NRC and Tech do not seem to want to do the tests of the lines and groundwater and ground etc. under the reactor area, as the basement is having a little problem, the basement floor is contaminated due to (or partly due to) the bismuth shield leaking since ages (see inspection report 50-160/93-02, Nov. 1, 1993) Nuclear Safety Committee minutes say it's giving off 5 Rem an hour. Oh joy! Oh bliss! Why "Oh Joy! Oh bliss!" ? Because that is the fuzzy state of mind going on there if the report I got that when it first started years back , is correct, namely that they used airplane glue to fix it.

I gave GANE quite a few of the inspection reports so GANE too could see what an awful state of affairs exists. I hope they use them in the GANE action against the liscense. I'm not going to go into more detail here as I am asking you all at NRC to read them yourselves and take action to grant my 2.206 petition in it's entirety as I have asked before.

By the way, with regard to the tests NRC had run concerning the City of Atlanta in the aforementioned inspection report, NRC states that (on p. 20 of the report) "The minute quantities of Sr-90 detected in sludge samples should be expected since its presence is most likely due to atmospheric fallout.". Give me a break. The State of Georgias Environmental Radiation SURveillance Report of Summer-1979 to Summer 1980 , on page 245 goes into all the contaminants found in the samples dumped to the sewers noting they are primarily "low-level corrosion and activation products including Co and Cs, with small quantities of sole beta emitters such as Sr-90, and other undetermined sole-beta emitters (probably-C-14) and higher levels of H-3" As the half-life of the Sr-90 is nearly 30 years , it came from Tech reactors operations, and likewise for the Cs-137 in the feed cake, due to its half-life.

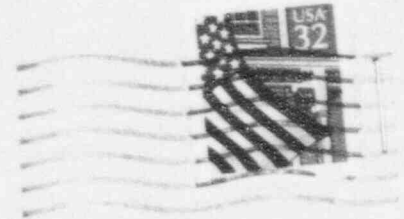
NRC's partial response to me (p.5) says the radium-226 and radium 228 were not from the Tech reactor, but of course the inventory (in documents signed by the Assistant Attorney General for the State of Georgia) show that there is Ra-226 and RA-228 there, and NRC knows what the inventory is, and what was found outside must have also come from inside. as well as from the decay of the u-238 which they also have inside at the reactor listed as DU-DEPL, which is Depleted Uranium, ~~which is~~ which is 99.75% u-238. DU, (Depleted uranium) has a half-life of 4.6 Billion years. The thousands of tons of it left in the Gulf War theatre - it is used in armour piercing bullets and tank shielding - by all sides, as all sides use it, is estimated to kill hundreds of thousands of civilians over time due to the radioactivity it emits. It is another reason for Gulf War Syndrome in the Veterans. NRC is wrong. The place is contaminated, outside is contaminated. My 2.206 Petition should be granted and all the documents I have prove it.

Pamela Blockey-O'Brien.

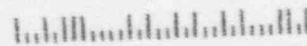
Pamela Blockey - O'Brien
 P.S. Please enter my letter to the ASH B Judges in my 2.206 Record. Thank you. copy enclosed

PAMELA BLOCKEY-OBRIEN
D23 Golden Valley
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USA

NORTH METRO GA 30134
PM
21 JUN
1998



The Executive Director
U.S. N.R.C.
Washington, D.C. 20555



Atomic Safety and Licensing Board,
Hon. Justice Bechhoefer, Chairman,
Hon. Dr. Kline,
Hon. Dr. Lam,
U S Nuclear Regulatory Commission,
Washington, DC 20555

Please enter in to
my 2.206
Petition Record.

Sept. 30th, 1995

Regarding Justice Bechhoefer's Memorandum and Order of Sept. 26th 1995 in the matter of Docket 50-160 Georgia Tech Research Reactor and GANE Contention 9 (and my concerns under my 2.206) and whether the organizational change has any effect upon Contention 9 and whether it may moot some or all of the contention.

Dear Justice Bechhoefer, Justice Kline and Justice Lam,

Thank you for the opportunity to respond. I do not believe that this change renders anything moot. One of the problems had been that contrary to NRC policy, according to newspaper reports, (and the former radiological safety officer) all of a sudden, the staff re-organization in the late 1980's took away a direct line of communication on safety issues with high officials at Tech as you are aware and the Radiological Safety Office was put under the Director (Dr. Karam). After all these years of acting contrary to NRC policy (allowed by Tech and the NRC) which I would consider to be a serious management deficiency by Georgia Tech itself as well as the Director and a violation by NRC of its own policy, Georgia Tech (with a little help from NRC perhaps?) seems to be doing a quick smoke and mirrors job of re-shuffling the deck back again now the pressure is on, in the hope of avoiding criticism. All this proves, is that there are management problems, this being only one of the problems, which would not have been addressed if there wasn't a huge fuss being created by myself and GANE. Had the various Committees and Offices at Tech meant to be involved with the reactor and staff and oversight done a good job all these years, there would not be, or have been all the problems noted in the files.

For example, on July 30th, 1993, I called to ask what type of research was being done at the reactor. I was put through to a Dr. Larson, who I was told was Assistant Director (I believe of Nuclear Engineering but I am not 100% sure, that can be checked) He informed me quote: that he was "not up to date with what they do there" and told me to "talk to Dr. Karam". I remember being very surprised that he did not know what went on there. The Tech license documents submitted under the Re-licensing 6.2 Nuclear Safeguards Committee, shows there is nothing on health that they look at. Furthermore, March 9th, 1987, Inspection Report of Inspection conducted Feb. 17-23 showed MAJOR violations on releases to the sewers and a lot more besides which was absolutely appalling, and problems continued one way or the other over the years. Inspection conducted July 31- Aug 3 1989 and Aug. 9 -10 1989 and Aug 29 - Sept 9 and Nov 1-10 1988 show continuous problems even though NRC had obviously gotten on the Nuclear Safeguards Committee to get its act together and the Safeguards Committee had been trying. However, as problems re-appear subsequently, or do not seem to have been addressed properly, it looks as if there is not sufficient oversight and monitoring of the facility unless half the known world is breathing down Tech's neck. That in itself shows a problem at all levels. The June 21st 1995 Inspection Report showed there was no calibration or operating procedure approved by the Nuclear Safeguards Committee for the Tennelec Proportional Counter and there were still, in my opinion, serious questions regarding recirculation time with the tanks which discharge to the sewers, as well as the problems with no analysis of the particulate filter.

I am also concerned that with this persistent pattern of problems which show a certain negligence to say the least, that NOTHING to my knowledge has been removed from the facility yet prior to the Olympics and that Tech even has the gall to want to keep the cobalt-60 and bring in the LEU, keep the red-waste and the sealed source etc. In my 2.206 I had asked that the materials be taken to a secure

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government facility to be kept safe. Dr. Karam told me he had put the cesium-137 up for bids. I presume that means what it usually does, namely that whoever bids lowest gets to haul it off. However, I believe it would be very dangerous for that to go to a non-government site, or heaven forbid wind up on the open market. Barnwell is not only NOT a government site, for example, but according to the report: "Waste Management Inc. An Encyclopaedia of Environmental Crimes and Other Misdeeds" (1991) In 1982 a U.S. Geological Survey report found that radioactive waste was leaking from the Barnwell dump (tritium) and that there was also contaminated water beneath the buried waste (tritium and cobalt-60) and that in 1986 Chem-Nuclear Transportation was identified as a potentially responsible party at the Maxey Flats Kentucky Superfund site. Further, that Chem-Nuclear Transportation paid a \$12,000 fine to settle charges that truck drivers were permitted to make improper entries on their record-of-duty status. Chem-Nuclear Services and Chem Nuclear Transportation are subsidiaries of the infamous Waste Management Inc. (aka W&K Technologies) according to the report, the company and its subsidiaries have paid at least \$ 28 million in penalties and settlements in anti-trust cases (p.128) and has been fined millions also for environmental crimes. For some obscure reason, the federal government still gives these awful companies - and their allies in some cases, such as EFCO contracts. (I suppose it helps that Howard Baker, Reagans former Chief of Staff & with Waste Management Inc., and that William Ruckelshaus went and joined BFI (former EPA and FBI) and former high ranking Dept of Energy officials like Earl Gjelde and Michael Lawrence went and joined Chem Waste Management also part of the Waste Management Inc. happy family. I do not feel any of these companies (and some not listed with fines against them) should be allowed to move this stuff, nor should it go to a private dump.

Again, with regard to the question of mootness, with which I disagree: with all the concerns regarding HEALTH, as well as safety, I do not feel that the Dean/office of the College of Engineering can address any of the health/safety issues. Those should be addressed by biologists and medical staff who specialize in the terrible health effects of radiation. I would draw your attention to the recent report (over 600 pages) by Nobel Peace Prize Winning Physicians for Social Responsibility entitled "Nuclear Wasteland. A Global Guide to Nuclear Weapons Production and its Health and Environmental Effects." in which they charge that on a global scale the health effects from radiation exposure as a result of decades of nuclear weapons production have been widely underestimated and workers often given false assurances that they were not over-exposed to radiation based on incomplete and sometimes fabricated records. The Tech reactor was/is part of the global weapons cycle and has received military monies. The inspection reports show concerns with measurements of radiation. In my opinion, health of workers and of the public should have been uppermost and it seems it was not. Even though under "6.2 Nuclear Safeguards Committee" it says they are responsible for maintaining health and safety standards the entire section, 1 through 12 NEVER addresses health. The Inspection Report of July 11th, 1990, done June 12-14, shows an individual was not performing proper personal surveys prior to leaving a controlled area, shows the individual had only received some training back in 1976 and that the licensee had no formal retraining program How many times have workers at Tech failed to monitor themselves for contamination or the instruments they work with (as in this case) the difference being that there was no inspector who happened to be around to notice? We know that it happened when the fellow got on the bus and went home in the late 80's, it is anyone's guess what has REALLY been going on there. This is but another small example of lack of oversight/management deficiencies.

As noted in the Inspection Report of June 1995, for ~~1988, 1989, 1989~~ with respect to gross radioactivity, there was no average concentration listed for the total amount released and no total amount listed in curies for those years, plus, there was no maximum concentration of gross radioactivity released to the unrestricted area or sanitary sewer listed for the years 1988 through 1993 Not only was this a violation, but again showed a lack of oversight and/or management on all levels (and negligence.)

Tech has had ample time to operate correctly, instead it has been a litany of problems and a lack of management and oversight. Right up until now.

With this sort of record, there are no guarantees at all that anything will change in the future, and just doing a bit of re-shuffling now that the heat is on is far too little much too late. That dump should be shutdown.

I would also like to take this opportunity to raise something on the safety/terrorism issue with the Olympics coming and absent the Olympics. I strongly suggest that all parties read the reports from 1972 published in the German news magazine "Der Spiegel" about the Munich disaster at the Munich Olympics, and the advance warnings a police psychologist gave which went virtually unheeded, as I sometimes get the impression, whether or not it is a true impression, that perhaps Tech wants to keep stalling and then maintain that there is not enough time to get everything out - (despite their assurances to the contrary) - and then say that they will be able to safeguard anything and everything and not to worry. If this is the case, it would be disgraceful. While some in the community of people who are meant to supply all the security for the Olympics may feel that playing Mr. Macho will take care of everything, I would remind everyone that we are talking an influx of approx. one million people into a city that can't even repair its sewers on time about to be sued for the pollution it causes by people at West Point lake further down the Chattahoochee River. We are also talking nuclear materials. Macho just won't be enough. Absent the Olympics, the same security issues remain. At the Munich Olympics a special, unarmed, police force of two thousand one hundred police men and women patrolled inside the Olympic Village alone, but no one could foresee or prevent the young man who climbed the fence and started the chain of tragedy. by the time he observed going over the fence it was too late. He didn't look like a stereotypical terrorist either, in his white hat, safari suit and sunglasses - until one saw the grenade he carried.....My point is, that everything at the reactor MUST go, and it should be allowed to wind up on the open market for sale either, and that includes the cobalt-60. given absent the Olympics, the place is a sitting duck for terrorists.

We are running out of time. I believe that Tech and the NRC should stop with the delaying tactics. I consider the management change issues just that. I believe they should face up to the fact that everything must go, that the place always was and is likely to remain a badly managed and operated unsafe dump of a facility and that it poses a real threat to the health, safety and well being of the city and state, and of course that it must be shut down and cleaned up too.

We are just getting (it's now Oct. 3rd) the first effects from Hurricane Opal. Peachtree Creek has risen 10 feet since last night and will go over flood stage. Flood warnings are out for Northwest Georgia and Fulton County where the reactor sits. I hope that basement doesn't flood again.

Thank you for your patience. Sincerely,

Pamela Blockey O'Brien

Pamela Blockey-O'Brien.