

October 27, 2022

To: Hon. E. Roy Hawkens

Docket 70-143-LA

Re: Intervention Pleading

Re: Docket ID NRC-2022-0097 and any other docket #'s or ML #'s that apply to the proposed conversion of Uranium Oxide to Uranium Metal at Nuclear Fuel Services, 1205 Banner Hill Road, Erwin, TN 37650. These are: ML21327A099 and the supplement # ML21327A099, L-2021LLA-0213, ML22014A421- ML22111A281. These are all – to my understanding so far- amendment requests to SNM -124.

Attention: Rulemakings and Adjudications Staff
Office of the Secretary
US Regulatory Commission
Washington, DC 2055-00

Office of the Secretary and General Counsel for Licensing,
Hearings, and Enforcement
Office of the General Counsel
US Nuclear Regulatory Commission
Washington DC 20555-0001

To the Secretary:

I have no lawyer on this and am submitting to the best of my ability. I am requesting as a result of NRC's decision to change processes on License SNM-124 at Nuclear Fuel Services LLC., Erwin, TN, a legendary rattle trap, and in lieu of the MLS#'s above, the Emergency- Escape Plan- for Erwin and a 50 mile radius of the plant. I submitted my first request in Feb. 2022. If

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the NRC and DOE wish to change processes at NFS- again- then the residents, the workers, and the people that have been so negatively impacted by this legendary facility, deserve the Emergency/Escape plan and one wonders why it is so difficult to acquire? In the paperwork furnished by NRC on this conversion of U Oxide to U Metal, it says there is a higher risk of accidents.

Perhaps NRC is unaware of our cancer rate, even though it has been submitted to the NRC. It was done by the then State Regional Epidemiologist. It was ignored by all of our Regulators... I keep repeating myself here.

Perhaps NRC is unaware of the radiation on my 2 properties, which I previously mentioned in my first submission; I have enclosed those tests which I personally paid for. They were quite expensive. Also, they are too expensive for the State to do because I have asked them why they won't test for radiation downstream from a legendary bad actor, NFS. They said it's too expensive.

When Senator Dick Luger put the Sapphire Project on us, (Oak Ridge was full) little did we know how much Kazakhstan preferred Beryllium in their bombs.

Beryllium in the river is through the roof. (See: TVA: Environmental Impact Statement (EIS) Oct, 2006) We asked TVA to help us do a core sample at the Greeneville Dam but they refused. No one seems interested in our plight on any meaningful level at all. No one is interested in our cancer rate

or the unmitigated number of dangerous accidents that have happened over the years at that 65 year old facility. There has been more than one person that has died on the job at that renegade facility. No one in power is interested in the past. The problem with that is these rads don't go away. The past is forever impacting us. The past is here now, it stays and it never lets go.

NFS has permanently damaged my property. It is not owned by TVA. I am mystified that I received such callous filings recently from the NRC. For years we have gone to the NRC presentations and we are just local women and we've dealt with Peter Habicorst and Kevin Ramsey for almost 2 decades and they have done nothing for us, nothing.

The NRC is intent on servicing the DOE. The DOE has been too long at our fair. How many more people have to die?

The NRC is overlooking NFS's Plutonium plume. There is a PU plume. In the groundwater. See Impact Plastics, Gerald O' Connor Lawsuit. I find this deeply telling and wildly disturbing. Why is this important? Because- its headed toward a little community known as Flag Pond. Those folks have water wells. What's troubling about this, is I have FOIA'd EPA, TDEC and have asked Brian Williams region 2, NRC, Atlanta, lovely man, and no one has the test well data from the following wells and they are as follows:

(I have requested the Test Well Data from 2010-2022 From the RCRA division of EPA and from TDEC and from NRC.)

98A
132A
138A
139A

140A
141A
142A
143A
144A
145A
146A
147A
148A
149A
150AW
151A
152A
153A
154A
155A.

Remarkably no one has it. Arcadis, a private consultant tested, but when has the ground water been tested since? This is important to the people along this river because NFS sits at the foot of the mountains and everything flows to the river like a funnel. And the karst topography makes it impossible to know which way the ground water finally flows. No one knows.

These wells I'm asking for are from the Plutonium Super Fund site at NFS. I find that in 2003 the super fund was archived, meaning "no further environmental action will be taken..." One wonders how that works? There is rain. There is global warming. There is a River that is our drinking water.

May I remind the NRC, Arjun Makhijani, President of IEER, busted the Plutonium model for the Bleu (Blended Low Enriched Uranium Process). No one at NRC or DOE cared. I

am concerned that NFS added a new process-- The BLEU—right on top of a Super Fund site and now the NRC would like to change processes again without an EIS? And an *archived* Superfund? I only find the Arcadis/Garrity private consultants document on those test wells. The EPA/TDEC/NRC closed down a Plutonium Super Fund site, Because?? Perhaps it was too much trouble? The missing paperwork sure is a mystery to me.

Joan Robinette is legendary in Kentucky as an environmentalist, she grew up in Erwin, 2 of her classmates were dead of Leukemia by graduation. This doesn't take a genius. If we are all so safe and we are all so fine, according to NRC - then where is the emergency escape plan for a 50 mile radius, of that legendary rattle trap? Why are we not allowed to see it? National Security? Then why are there so many aerial shots available of the plant?

Also note that the Nolichucky is **Impaired** with sediment which TVA addresses in 2006 and TDEC admits. All those Rads that were turned in to NRC in the Ketterer Report, the NRC is ignoring. The DOE is ignoring. The EPA is ignoring. TDEC is ignoring. Flat- out ignoring. Rads are cumulative. The most cursory inspection that someone like myself, an actress... can find says-

U-238 half -life of about 4.5 billion years. U-232, has a half- life of 72 years. Plutonium 238 has a half- life of 88 years. U-235 700 Million years. Then there's the Thorium and daughters and even though I'm just a trained actress, I can read.

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“The obtained (234)U half-life is $244\,900 \pm 670$ years ($k = 1$), which is in good agreement with the previously reported results in the literature with comparable uncertainty. The main advantages of the proposed method are that it does not require the assumption of secular equilibrium between (234)U and (238)U. Moreover, the calculation is independent from the (238)U half-life value and its uncertainty. The suggested methodology can also be applied for the remeasurement of the half-lives of several other long-lived radionuclides.”

As for the ATSDR, they tried to get away with telling us they didn't do radiation. They lied to us. Dr. Charp lied to us. They tried to tell us there was no pathway to humans. Since we drink the water and the cows drink the water and Scott's Strawberries are grown with the water, it's not too hard to see that there is a pathway to humans. The ATSDR lied flat -out to us. But the ladies got them to admit there could be a pathway to humans. That is the fact. Further, at the Santa Susana site in the Simi Valley Knolls, those folk got Senator Diane Feinstein to get them an independent look at the former Rocketdyne site. They were not as naïve as I about the ATSDR.

1. A new process is attempting to be brought into a shambles of a facility. Disaster after disaster. Enclosed is one example of many in a long line, but it happened on the first of Oct. of this year. It is enclosed for your convenience.

We have been on a journey here. A journey that has exposed remarkable bad faith, remarkable abuse, remarkable lies and it continues. We are asking for humanity here. Guy Blackwell, a former Federal Prosecutor here in Greeneville, TN, the Federal hub, tried to take on NFS. The Feds, ya'll ---shut him down so fast he didn't know what hit him. He told me this

himself. We are tired of abuse. We really deserve better. WE HAVE HAD ENOUGH. Surely you can see that and see why. We have presented you with the evidence.

This insanity must stop. If there is no evacuation plan, then we are all dispensable? That's not acceptable anymore. Stop this licensing maneuvering.

2. The DOE and NRC must do an Environmental Impact Statement, because 65 years down the road one has never been performed and we find that unacceptable. The NRC and the DOE are culpable for what is prominently seen and historically known about the NFS plant. An Environmental Assessment (EA) is another bad joke on the people of this area.

The people of Erwin and surrounding areas have been denied access to any kind of evacuation plan in case of an accident of which there have been many. I find it ludicrous that people are being used as guinea pigs without being told. They are also not being told what to do in an accident. Stop with an EA (Environmental Assessment) and at least acknowledge that you need an EIS (Environmental Impact Statement). 65 years is a bit late, but it's better than nothing –

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3. I want the NRC and DOE to know how culpable for the deaths at the renegade NFS and for the cancer rate here. See: **Internal Dosimetry Coworker Intake Exposure Model for the W.R Grace Company, Erwin, Tennessee. White Paper, National Institute for Occupational Safety and Health, March 1, 2019.**

Sincerely, Park Overall

Please don't publish address:

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