The Executive Director, USS. NRC,
'Washington D.C. 20555-0001.

Dear Director,


PAMELA BLOCKEY-O'BRIEN D23 Golden Valley. Douglasville, GA 30134


March 28th, 1995

Fe: My 2.206 Petition to the NRC Concerning the Georgia Tech Nuclear Research Reactor etc.
I have just found att that same information I sent you in my letter of Feb. 21st, 1995 is wrong. on page two, there is a section on the R.M. Clayton Sewer Plant and cancer rates. I got those rates from a press release on the subject issued by Oamissioner Darnell (Fth District). From what I have been told by another scientist, those figures were put together from hospital records. In the meanwhile, I found out ( by accident actually) that they are wrong. You see, the State uses a whole combination of sources, and until fairly recently, if sanerne HAD cancer, but died of pneumonia due to their weakened immune system, the pneumonia would appear as cause of death. This has all been changed.

According to the Health Assessment Services Init./Statistios of the Division of Public Health of the State of Georgia, Susan S. Denver, the figures should be as follows:
For 1990 to 1993 (inclusive, ie. four years)
Total Cancer Deaths (all body sites) 4,77
Total Lung Cancer Deaths 1,255
Total Breast Cancer Deaths 449
Total Leukemia Deaths 193
This is deviously far higher than the figures I had. The problem is this: the State /I myself do not have it now broken down into Commission District. This can be dane, but in order to do that, it will cost up to $\$ 50$ for computer time etc. I dan't have that money at present. If I can get it, I will get that done. Of Come the NRC could request it and pay for it perhaps. The further problem is this: while it is possible that the cancer deaths increase accordingly with these higher numbers, in District 5, it is also passible that it may not be the case. It could remain the same, could show another area higher, or this area plus another wind path area higher. I just dan't know without the data needed. Camussionar Damells' office did the right thing with the information they were working to it seems, however it is not the complete stacy. In any event, it is a lot of campers.

With regard to the EE-7 (radioactive Beryllium) contamination, I would draw your attention to the fact that EPA classifies NON-radicactive beryllium dust as a hazardous waste, plus there are laws regarding its discharge to waters and sewage treatment facilities. The fact that what we have is radioactive only makes the problem worse. The Dept. of Health and Hum en Servioas and the Intemational Agency for Research on Cancer and the EPA have determined that (non-radioactive) beryllium and beryllium compounds are are probably carcinogen enic, besides causing a hast of other problems. Radioactive beryllium would obviously have even worse effects. Beryllium is extremely toxic to wamwater rich in soft water. According to the Toxicological Profile on Beryllium (i.e. not radioactive and from the reactor clviously) application of sewage sludge containing higher than badground concentrations of beryllium on land can be a beryllium source in soil. From there you get the uptake to plants of course. The radioactive beryllium rust have come from the reactor, there is no other way to explain its presence in soil and vegetation near the reactor, that I am aware of. If it is in the soil and vegetation, how do we know it was not also released to the sewers ? I would like that answered. If it was, how much/what canoentrations/when? The soil must also be cleaned un, and extreme care tee taken not to raise dust in doing so. Such dust/soil should not be incinerated either according to the tadiological profiles on beryllium, that would apply even more as this is radioactive.

With regard to the contamination of sludges fran NRC allowing sewer duping (even if local ordinances prohibit it, ar use drinking water guidelines, what NRC fails perhaps to understand, is that one rust look not just at the effect on humans when this crud winds up in water, but at all aquatic species, micro-arganisms and such, as well as animals and birds who will drink from open bodies of water. NRC, as well as other agencies does not seem to understand the inter-relatechess of all life. This is the most important thing to understand. On that fact depends the survival of the planet. Period. Visualize all life forms as a suspension bridge, then remove a tiny rivet in the middle of the bridge. Over time, the effects an different parts of the structure will wind up with the whole thing (mllapsing into the gorge.

## 2.

If nuclear facilities were the only facilities dumping to sewers and releasing to air etc. it would be bad enough, but this is not the case. For example, in Fulton County, Georgia alone, of those companies required to report their toxic releases (and hundreds are not required to do so) a total of 140,956 pounds of toxic chemicals were dumped to the sewage treatment plants, 98,586 pounds dumped to surface waters, and $3,189,780$ pounds emitted to the air. This assumes that the reporting companies are being honest. All this is legal one way or the other. (Which may be why there is a saying "the law is an ass" in certain circumstances.) Every state and county in the nation is doing similar. Those figures are for '93. Wat each agency does, does not exist by itself. Hence the outrage (in part) over NRC wanting to declare vast amounts of the rations radioactive waste "Below Regulatory Cancer" so it could have been duped to sewers, landfills and such, and public health and the ewircment be darned. - A reminder here -dan' 5 regurgitate that in any form as I have heard NRC might. I can't stress that enough.

The fact that NRC allows discharges to sewers (which it should not) does not make it right that Georgia Tech (or any lab etc.) dumps radioactive waste to the sewers when local ordinances are violated. I would like to remind the NPC, that if there were a major accident causing massive discharges into the sewer system - possibly even of boiling, radioactive water - to say that Tech violated Ciy ordinames would be the understatement of the century. This sumario is possible.
NRC should grant my petition. Thank you.


Pamela Blockey-O'Brien.



