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Department of Energy Federal Court Filings Deny Controversial Nuclear Reactor Safety Issues

In January, a coalition of environmental groups and individuals, led by Jackson, Wyoming based Keep Yellowstone Nuclear Free, filed suit against the United States Department of Energy in the Federal District Court for the District of Idaho alleging that the DOE has failed to comply with the National Environmental Policy Act ("NEPA") in connection with its Advanced Test Reactor Life Extension Program (the "LEP"), and is seeking to shut the facility down until its safety can be assured. In addition to KYNF, plaintiffs in the case include Wilson, Wyoming resident Mary Woollen, Troy, Idaho based Environmental Defense Institute, former Idaho State Senator and Carey, Idaho sheep and cattle rancher John Peavey, and Aberdeen, Idaho resident Debra Stansell.

In March Idaho U.S. District Court filings, DOE, represented by the U.S. Justice Department denied categorically that the Advanced Test Reactor has any safety problems. DOE claims, "To the extent a response is deemed necessary, Federal Defendants deny any alleged violations and deny that Plaintiffs are entitled to any relief."¹

In a separate but parallel 2006 lawsuit against DOE, Keep Yellowstone Nuclear Free (KYNF), Environmental Defense Institute (EDI), and David McCoy challenge the DOE's refusal to release crucial information related to the Advanced Test Reactor. Lead plaintiff attorney Mark Sullivan states; "This is an action under the Freedom of Information Act (FOIA) in which the plaintiffs seek disclosure of documents in the possession of the defendant Department of Energy (DOE) that describe safety shortcomings and the consequences of an accident at the Advanced Test Reactor (ATR), a 40-year old nuclear test reactor located at the Idaho National Laboratory INL)."²

DOE claims that most of the ATR information is classified secret/restricted and thus can't be released under the FOIA. This arbitrary denial of crucial safety information is making the above NEPA lawsuit against DOE more difficult to argue in court. Clearly, national security is not at risk here, however, DOE's self-regulated credibility to safely operate the ATR is at risk! Wyoming District Court Judge Downes agreed to review "in-camera" the 1,400 pages of classified DOE documents to determine if DOE's secrecy claim is legitimate. As of this writing, Judge Downes has yet to issue a final summary judgment in this FOIA case.

The DOE is withholding critical information from the public in an attempt to conceal serious safety vulnerabilities at the ATR, an aging reactor with sub-standard safety systems that poses a serious threat to the communities in eastern Idaho and western Wyoming as well as to the national treasures of Yellowstone and Grand Teton National Parks. The public has the right to know that the ATR is highly vulnerable to seismic and engineering failure, and must be fully apprised of the likelihood and severe consequences of an accident at the ATR.

We requested the withheld documents from the DOE in an attempt to better understand the possible risks associated with DOE's \$300 million plan to manufacture plutonium-238 at the ATR. The plutonium would be used to make radioisotope power systems, or "space batteries," for use in deep-space probes and other applications. Under the proposal, the ATR, already well beyond its life expectancy, would continue to operate for another 35 years.

We have examined DOE's proposed plutonium production project at the ATR for nearly two years. In that time, numerous safety shortcomings have been uncovered at ATR, including, according to DOE's own engineers, the possibility that the ATR's Emergency Firewater Injection System (EFIS),

¹ Thomas E. Moss, U.S. Attorney for Federal Defendants' Answer to Plaintiffs' Complaint, March 23, 2007, CIV. No. 07-36-E-BLW.

² Mark Sullivan, lead attorney for KYNF, EDI, and McCoy Complaint, U.S. District Court, District of Wyoming, 06-CIV.205 (D).

designed to flood the reactor core in the event of a loss-of-coolant accident, would fail in the event of a moderate seismic event.

The failure of the ATR Emergency Firewater Injection System (EFIS) could lead to a total loss of coolant in the reactor, resulting in a reactor core meltdown and a massive radiation release into the atmosphere. DOE engineers have stated that the radioactive inventory of the ATR's reactor core is 175,000,000 curies. A release of that magnitude would be second in world history only to the radiation released during the Chernobyl accident of 1986.

The INL site which contains the ATR sits in an active seismic zone. The largest earthquake ever recorded in the U.S. – the Yellowstone quake of 1959 – had its epicenter just 137 miles from where the ATR now sits.

We discovered that even DOE's own people who worked closely with the ATR had serious concerns about the facility. For example, in comments made concerning "Safety of Reactor and Nuclear Facility Operations" at the National Institute of Standards and Technology, Dave Richardson of ATR Operations stated that "once you get below the surface, operations at ATR are not headed in the right direction." Richardson noted that "ATR has about 75 man-years of maintenance backlog without design basis reconstitution."

With 75 man-years of maintenance backlog at the ATR, it is totally irresponsible for DOE to propose expanding the mission of this 40-year old reactor to produce one of the deadliest substances known to man.

When we read those comments, we started digging further. Unfortunately, DOE is afraid to tell the public what the situation at the ATR really is and has refused to turn over documents related to the safety shortcomings and accident scenarios at the ATR. What are they hiding?

DOE has withheld all or part of an eleven separate documents, claiming that their release would jeopardize national security and potentially enable a terrorist attack on the ATR. While their content cannot be known, the documents include memoranda and reports that carry titles such as "Upgraded Final Safety Analysis," "Combination Fire Hazard Analysis and Fire Safety Assessment," and "Update of ATR Break Spectrum and Direct Damage Loss of Coolant Accident Frequency Analysis."

It is shameful that the DOE is hiding behind the specter of terrorism in an effort to conceal serious safety problems at this 40-year old nuclear reactor. There is no lawful justification for withholding these documents. Government secrecy is anathema to our open and democratic society. The Freedom of Information Act is one of the most important bulwarks against such unwarranted secrecy. The DOE is flouting the law in order to conceal the vulnerabilities of the ATR.³

DOE Refuses to Address Advanced Test Reactor Hazards

The National Environmental Policy Act (NEPA) requires that federal agencies prepare an environmental impact statement and conduct hearings to receive public input for all "major federal actions" that are likely to significantly affect the environment. The DOE Advanced Test Reactor Life Extension Program (LEP), according to the above described law suit, will generate massive amounts of highly radioactive waste for which there is today, no path for disposal, and will increase the likelihood of a major nuclear disaster at INL, impacts that the DOE must weigh before proceeding with the LEP.

The Advanced Test Reactor (ATR) Life Extension Program (LEP), according to DOE documents obtained by the plaintiffs, is a ten-year, \$200 million program intended to extend the life of the ATR until the year 2040.

The ATR, which is already nearly 40 years old, became the subject of public scrutiny last year when the DOE proposed to use it to produce the deadly isotope Plutonium-238. As the scrutiny has intensified, and more has been learned about the precarious operating history of the ATR, the DOE has repeatedly insisted that the facility is safe. Why does the American taxpayer have to spend \$200 million

³ Keep Yellowstone Nuclear Free Press Release August 8, 2006.

on the ATR if it is safe? It's completely backwards—they should shut it down, fix the problems they know pose imminent harm, and then put it back on-line with confidence.

According to a September, 2006 document outlining the LEP, the LEP is a “major project to extend the life of the ATR to the year 2040.” That document states that the ATR’s “routine maintenance, upgrades, and infrastructure” have suffered from years of “budget austerity.” As a result, the ATR has a massive engineering work backlog of more than 115,000 man-hours.

Even at a price tag of \$200 million, the LEP does not include any major physical upgrades of the facility. Incredibly, that sum is the amount necessary just to assess the safety basis of the facility and address the engineering backlog. In addition to addressing that backlog, it will pay for the design basis reconstitution program, a material condition assessment, a probabilistic risk assessment, and seismic qualification program, all of which are necessary to evaluate the present condition of the facility and the possibility of continued safe operation.

The lawsuit asks the Court to order the DOE to shut down the reactor until such time as the key safety-related components of the LEP are performed. DOE has admitted the need for a systematic investigation into the ATR’s many problem areas and refurbishment where necessary. But, it is clear that, in addition to the serious problems that have been publicly discussed, there are a great many unknowns at the ATR. The plaintiffs believe that the reactor should be shut down until such time as the DOE can guarantee that it is safe to continue operating.

It is ludicrous that that DOE has embarked on this program without weighing its many alternatives, and doing so in a public forum. The DOE must prepare an Environmental Impact Statement for the LEP, and that document must evaluate all of the DOE’s alternatives, including building a new test reactor, either at INL or another facility.

Some of the safety deficiencies and concerns at the ATR, all of which are identified in the DOE’s own documents, include the following:

- **Concrete Wall Lacks Reinforcement:** According to a November, 2004 report prepared by DOE’s consultant, the Ares Corporation (the “Ares Report”), a very large concrete block shielding wall (8 feet tall and 73 feet long) is inadequately braced, and would fail in the event of a major earthquake, crushing the ATR’s adjacent primary coolant system lines. The Ares Report states that “Failure of this wall could result in a loss of primary coolant” and that the wall is vulnerable to damage “at relatively low seismic input levels” and “will behave as two rigid bodies pivoting about the top and bottom supports.” The Ares Report recommended further evaluation and additional bracing for the wall.
- **Other Concrete Block Walls Unreinforced and Vulnerable:** The shielding wall noted above is by no means the only vulnerable structure in the Test Reactor Area. The Ares Report reviewed the construction drawings for a number of buildings in and around the ATR to determine whether numerous concrete block walls are reinforced. In many cases, the safety of these walls could not be determined because construction drawings were missing or inadequately detailed, or because it could not be determined if the plans had been followed. In other cases, it was concluded that the walls were not reinforced. As the November, 2004 report states, “the drawing review indicates that the concrete block structures are only lightly reinforced at best.” This includes walls for the deep well pump houses which would be relied on to supply cooling water to the ATR in the event of the disruption of commercial power, as well as numerous walls through which the critical Emergency Firewater Injection System piping passes.
- **Fire Protection Piping a “Major Concern:”** The ARES Report states that “use of the fire protection system as a safety injection system for ATR is still a major seismic concern.” According to the ARES Report, the fire protection piping is “often supported from unreinforced masonry walls” which are very vulnerable, as described above. Although a minor modification was subsequently made to the Emergency Firewater Injection System (“EFIS”) which would allow an operator to isolate the ATR section of the EFIS from other seismically weak piping, and supports seem to have been added to some piping, more recent reports, including the March, 2006 LEP Plan, continue to maintain that the Emergency Firewater Injection System must be replaced. This major facility upgrade, critically necessary to ensure safety, is not included in the \$200 million figure for the LEP plan.

- **PCS Piping Supports Suspect:** The ARES Report states that assumptions made regarding the size of the primary coolant system (PCS) supports are likely false, that those supports “appeared to be marginal for the size of the PCS piping” and that “a re-evaluation of the PCS should be conducted, including an assessment of the supports.” To date, to KYNF’s knowledge, no such assessment, or improvements, has been performed. Leaks in the PCS heat exchangers allow radiation to migrate to the Secondary Coolant System and the atmosphere via the cooling towers.
- **Off-Site Substations Vulnerable:** The three substations that provide power to the ATR are all vulnerable to seismic effects, and would likely fail in the event of a major earthquake. This is particularly troubling in light of problems identified in starting the emergency diesel generators, and problems with aging switchgear at the ATR. Without power, the ATR will be without water for reactor cooling purposes.⁴

Furthermore, the DOE’s Facility Certification Report No. 29 details a startling number of problems at the ATR that demonstrate that the ATR’s age (it is nearly 50 years old) is a significant concern. These problems stand in sharp contrast to the DOE’s repeated reassurances that the facility is “state of the art” and that its age is not a concern because its “core internals” are replaced periodically. Here are some of the troubling signs:

- **Control Rod Problems:** The Facility Certification Report identifies mechanical failures of the control rods in the reactor. There appear to be mechanical and electrical problems, and debris blocking their movement. The control rods are the primary shut-down mechanism for the reactor.
- **Radiation Monitoring System “Frequent Failures:”** The Facility Certification Report states that radiation monitors “should be replaced with an upgraded system due to the equipment age and frequent failures.” Also the High Level Radiation Monitoring System was not working. The report cites “numerous hardware and software problems that have been unable to be corrected.”
- **Spare Parts Unavailable.** The Facility Certification Report states that “spare parts for older systems are increasingly unavailable.”
- **PCS Heat Exchangers Corroded:** One primary cooling system heat exchanger developed a leak. Further investigation revealed pitting corrosion in **all** of the PCS heat exchangers. The Facility Certification Report states that “the ATR PCS/Secondary Coolant System (SCS) heat exchangers are operating beyond 200% of their 20-year design life” and it suggests that there are serious consequences of atmospheric releases from failure.
- **Seismic Deficiencies Noted:** Offering little in the way of specifics, the Facility Certification Report states that “Not all of the equipment is qualified to the current seismic design criteria.” That is certainly the case, as demonstrated by the ARES Report, and the Life Extension Program (LEP) Plan.

All of these troubling problems must be viewed in light of the fact that the ATR has no containment dome typical of commercial nuclear reactors, which would minimize radioactive releases in the event of a major accident.⁵

For more information and full text of court filings on both ATR suit and the FOIA suit; see EDI website <http://environmental-defense-institute.org>

⁴ Katherine Ellsworth, Local-council for plaintiffs, KYNF, EDI, Woollen, Peavey, and Stansell, U.S. District Court for the District of Idaho Eastern Division, Case No. 07-36.

⁵ Mark Sullivan, lead attorney for KYNF, EDI, and McCoy Complaint, U.S. District Court, District of Wyoming, 06-CIV.205 (D)

Idaho Approves DOE New INL Mixed Hazardous and Radioactive Waste Operations

The Department of Energy's (DOE) Idaho National Laboratory (INL) submitted a permit modification request to the Idaho Department of Environmental Quality (IDEQ) that includes a new high-level and transuranic radioactive and hazardous waste processing plant. This new operation is called the Integrated Waste Treatment Unit (IWTU). This is the deadliest material on the planet short of nerve-gas.

On March 27, IDEQ announced its final decision to approve the DOE permit despite public opposition and comments. As required by law, IDEQ issued a "Response to Comments" that dismisses Environmental Defense Institute and Keep Yellowstone Nuclear Free comments that challenge the regulatory violations in the permit. IDEQ states: "The [EDI/KYNF] comment does not address issues pertinent to the proposed modification request to build a steam reformer to treat waste at INL" and "This comment is beyond the scope of this permitting action."⁶

EDI and KYNF Petition EPA Inspector General to Investigate IDEQ Permitting

The Environmental Defense Institute and Keep Yellowstone Nuclear Free filed a formal Petition requesting that the U.S. Environmental Protection Agency Office of Inspector General conduct a formal investigation.⁷ This petition related to EPA Region-10 (2/26/07) final ruling on our (11/9/06) petition opposing EPA's Idaho Authorization of State Hazardous Waste Management Program Revision.⁸

We believe that EPA Region-10 ruling offered inadequate and inconclusive legal and regulatory justification to substantiate their ruling to re-authorize Idaho Department of Environmental Quality (IDEQ).

Petitioners offer our joint comments to IDEQ on their "Intent to Permit" a new mixed hazardous and radioactive treatment operation. These comments articulate significant continuing deficiencies in IDEQ's RCRA/HWMA current permitting process.⁹

EPA Region 10 relies on CFR 270.72 "Subpart G Interim Status, Changes During Interim Status" in its ruling. However, EPA fails to document how these new INL operations were under Interim Status. Moreover, IDEQ's "Intent to Permit" IWTU contains no apparent reference to Interim Status and only characterizes it as a "Partial Permit."¹⁰

The DOE Permit Request submitted to IDEQ includes a new high-level radioactive and hazardous waste processing plant. IDEQ's permit approval is back dated to September 16, 2004 for a "partial-permit (for less than entire facility)."¹¹ Because this is the deadliest material on the planet, every environmental regulatory control must be applied to the permit application. In our view, neither EPA Region-10 nor IDEQ has fulfilled its requisite oversight duty.¹²

IDEQ has allowed DOE for many years to "boot-strap" new deadly waste operations like the Integrated Waste Treatment Unit (IWTU) onto old Process Equipment Waste Evaporator (PEWE) permits

⁶ Brian Monson, Hazardous Waste Program Manager, Idaho Department of Environmental Quality, letter to Chuck Broscious and Mary Woollen, 3/27/07, with attached Response to Comments, page 15 and 17.

⁷ Eileen McMahon, Assistant Inspector General, letter to Broscious 4/13/07, stating "review process may exceed 4 weeks."

⁸ Janis Hastings, Associate Director, Office of Air, Waste, and Toxics, U.S. EPA Region 10, 1/26/07.

⁹ Preliminary Comments on U.S. Department of Energy Class 3 Modified Permit to the Volume 14 for the Idaho Nuclear Technology and Engineering Center (INTEC) at the Idaho National Laboratory, Permit Number EPA ID No. ID4890008952I. INTEC Liquid Waste Management System and the Integrated Waste Treatment Unit. IDEQ Public Notice of Intent 1/26/07 to approve Class 3 Permit Modifications of Volume 14, Docket Number 10HW-0701.

¹⁰ Robert Bullock, Hazardous Waste Permit Coordinator, Idaho Department of Environmental Quality, 1/26/07, Dear Citizen Letter, Public Notice: Intent to Approve a Permit Modification Request.

¹¹ IDEQ Toni Hardesty, Director Department of Environmental Quality, September 16, 2004.

¹² Permit Modification, Attachment 1, Section B, Facility Description, (Dec. 06). IDEQ reference (1b_facility description).

and thereby avoid the otherwise full legal Resource Conservation Recovery Act (RCRA) and Clean Air Act (MACT) permitting process.¹³ DOE's IWTU is required as a matter of law to obtain a RCRA and MACT permit as a new major source facility and not be engrafted as a modification onto the current application that is decades old.¹⁴ This is a jurisdictional issue that requires resolution before the IWTU can receive any legitimacy as a RCRA facility.¹⁵

The IDEQ, with EPA Region-10's concurrence, illegally relies on the decades old RCRA permit (on record) for the Process Equipment Waste Evaporator (PEWE) and attempts to "boot-strap" **new separate operations in separate buildings** into this new permit modification. Current EPA regulations restrict permit modification to **existing** permitted operations.¹⁶ Therefore, IDEQ approval of this new permit modification is bogus because there are no original permits for the IWTU, High-level Liquid Waste Evaporator and Liquid Effluent Treatment & Disposal. These operations needed to obtain individual RCRA permits as new facilities because they were not in existence before 1986.¹⁷ Moreover, the deadline for DOE compliance with the Clean Air Act/NESHAP/MACT standards for these operations was 6/29/98.¹⁸ Why? Because even Idaho knows that Interim Status only applies to RCRA operations operating prior to 1986.

EPA Office of Inspector General (EPA/OIG) states; "Interim status is a temporary designation, but some units have existed for as many as 25 years without formal issuance or denial of a permit, or other regulatory controls."¹⁹ Additionally, Petitioners believe the 2/5/04 EPA/OIG Evaluation Report "Review of EPA's Response to Petition Seeking Withdrawal of Authorization for Idaho's Hazardous Waste Program" recommendations have not been adequately or fully implemented by either Region 10 or IDEQ.²⁰ Due to the fact that a significant number of requested FOIA documents have yet to be released by DOE/ID, EPA Region-10 and IDEQ, Petitioners reserve the right to submit additional information to EPA/OIG if and when these reports are released.²¹

What can you do? Contact Eileen McMahn, Assistant EPA Inspector General, 1200 Pennsylvania Av. NW, Mail Code 2491T/3106, Washington, DC 20460, or hotline@epa.gov
Kathleen Trever, INL Oversight Program, 1410 N. Hilton, Boise, ID 83706, 1-800-232-4635,
Kathleen.trever@deq.idaho.gov or brian.english@deq.idaho.gov

¹³ Code of Federal Regulations (CFR), National Emission Standards for Hazardous Air Pollutants, Maximum Achievable Control Technology (MACT) Standards for Major Sources 40 CFR 63.40 through 63.44

¹⁴ IDEQ Updated Listing of INL RCRA documents 1/17/07, INTEC Permitting, page 29-30, shows the last full RCRA permit for the Process Equipment Waste Evaporator.

¹⁵ 40 CFR 270.42

¹⁶ 40 CFR 270.42(a)(i) Subpart D Changes to Permit. 6/7/05

¹⁷ Construction for the High-Level Liquid Waste Evaporator (HLLWE) at the Idaho National Laboratory was initiated in 1993 and operation of the HLLWE as a new facility began in 1996. The HLLWE has processed over 4 million gallons of high level radioactive liquid and mixed hazardous wastes without a RCRA permit. DOE is required but has failed to submit an application for a RCRA permit for the HLLWE. The HLLWE has operated at all times without a RCRA permit and without interim status. See Environmental Defense Institute, et al., Notice of Intent to Sue DOE, 7/9/02, available at; <http://environmental-defense-institute.org>

¹⁸ 40 CFR 63.42. Also see EPA Office of Inspector General 3/9/05 Evaluation Report "Substantial Changes Needed in Implementation and Oversight of Title V Permits If Program Goals Are to Be Fully Realized"

¹⁹ USEPA Office of Inspector General, 12/4/06, EPA's Management of Interim Status Permitting Needs Improvement to Ensure Continued Progress, Report No. 2007-P-00005.

²⁰ Office of Inspector General, Evaluation Report, Review of EPA's Response to Petition Seeking Withdrawal of Authorization of Authority for Idaho's Hazardous Waste Program, Report No. 2004-P-00006, 2/5/04.

²¹ Environmental Protection Agency Region 10 denied fee waiver to Environmental Defense Institute's Freedom of Information Act request for INL permit documentation "EPA has determined that the requested records do not meet the threshold test of contributing significantly to the public understanding of the operations or activities of the Federal government." Stephanie Kercheval, FOIA Officer, 2/7/07. EPA requires payment of \$750 for processing fees. Idaho Department of Environmental Quality also denied EDI fee waiver for INL permit documentation.

Give RECA Compensation to All States

The Spectrum reports 4/2/07 that "Proposed legislation by Idaho Senators Mike Crapo and Larry Craig and Montana Sen. Conrad Burns to amend the Radiation Exposure Compensation Act (RECA) to include both states failed in the last Republican controlled Congressional session but did not die. All three Senators are joining forces again to reintroduce the bill with the support of other states that would compensate those showing medical evidence they were harmed by nuclear testing fallout in the 1950's and 1960's. The federal program enacted in 1990 has reimbursed Downwinders - the term used for victims of nearly 1,000 atomic tests at the Nevada Test Site - with \$50,000 to \$150,000 stipends in 22 rural counties in Utah, Nevada and Arizona.

"The National Academy of Sciences (NAS) recommends that Congress revise RECA to base compensation on medical history of applicants and not just geographic designation. Residents of the continental United States, Alaska, Hawaii, and overseas U.S. territories who have been diagnosed with specific RECA-compensable diseases and who may have been exposed, even in-utero, to radiation from U.S. nuclear-weapons testing fallout should be compensated, the report said.

"We concur with the NAS report, but how do you do that when the money is not there? The RECA trust fund has had major shortfalls that presidential discretionary funds of \$72 million covered to make it whole through 2005. The General Accounting Office estimated that the funding levels appropriated to the RECA trust fund would be insufficient to meet the projected claims and will require a further \$107 million through fiscal year 2011. These victims are just as much national heroes to whom the country owes justice as soldiers who made sacrifices on the battlefield. Of course, we've seen how we treat our war heroes."

In a 4/4/07 *Spectrum* editorial response, Gerard Fischer, RECA Assistant Director wrote; "In 2004, Congress ensured that RECA funding would be available and all meritorious claims would be paid throughout the life of the program. Since its inception, over \$1 billion has been provided to more than 24,000 deserving Americans and their families. This fiscal year alone, we have awarded over \$89 million. We agree that those men and women who sacrificed their health and lives are owed justice for their support to our nation's defense and we will continue to operate in a manner that will ensure that their sacrifices are not forgotten."

Thwarted Warrior

Robert Koehler reports in *Tribune Media Services* 4/12/07 that "We know about the Veterans Administration (VA) scandal, the great betrayal, but what almost no one talks about are the numbers. According to Veterans Administration figures from last August, 205,000 GIs who have returned from Iraq and Afghanistan, a third of the total, have sought medical care, for such problems as malignant tumors (1,584), endocrinial and metabolic diseases (36,409), nervous system diseases (61,524), digestive system diseases (63,002), musculoskeletal diseases (87,590), and mental disorders (73,157), among many other conditions. One of the largest categories is "ill defined," a.k.a. mystery conditions (67,743). In comparison, a relatively small number (35,765) have sought VA care for injuries. The staggeringly backlogged Veterans Administration, which takes on average six months to process a claim and two years to process an appeal, cannot begin to cope with this onslaught of need and misery, but in contemplating the unconscionable lack of planning that resulted in this disaster, let's not forget to ask a more basic question: Why are all these GIs getting sick? And with even more urgent moral imperative, especially in the context of the invasion's justification, we must also ask: What about the Iraqis? Count on it, if our vets are sick, so are the Iraqis' children, their elderly, and they're making do with a shattered health-care infrastructure that makes our own look positively First World. These are the words of Doug Rokke a thwarted warrior, a betrayed warrior, driven by what he has seen and understood to turn around and stand up to the real threat: the friendly (or fratricidal) fire behind him. The best of America is serving the worst. "