

Comment Set 16 Russell D. Hoffman

San Onofre EIR Project

From: Russell D. Hoffman [rhoffman@animatedsoftware.com]
Sent: Tuesday, May 31, 2005 3:50 PM
To: sanonofre@aspenerg.com
Subject: Tension around San Onofre is high (Follow-up comments to CPUC SONGS DEIR 2004101008 (A.04-02-026))

Note:

These are additional comments to address issues raised at the CPUC public hearings on San Onofre recently.

From:

Russell Hoffman
Carlsbad, CA

Newsletter Of Shams, Hoaxes, Infiltrators, and Terrorism
Volume 2, Issue 1
Edited by Russell Hoffman
May 31st, 2005

Dear Readers,

Tensions are running high around San Onofre.

This morning the local paper published a follow-up article about one aspect of the recent CPUC (California Public Utilities Commission) hearings, namely, worries about the de-tensioning of the steel cables within the walls of the containment dome, which ring the reactor and are encased on all sides with cement.

A typical containment dome under construction looks a lot like a super-sized wicker basket. Hundreds of cables are laid down in rings around the dome, and hundreds more form polar quarter-circles out from the top, or semicircles that run near the top, and/or they follow various ellipses around the dome.

The main cables are typically 2 to 3 inches thick with some even thicker, and they are cross-braced with thousands of shorter 1-inch-thick cables. The whole thing is filled in around all the cables with concrete, forming the infamous domes that you see from the highway.

This system is called "pre-stressed" because a portion of the cable is left outside the concrete and is pulled with tremendous pressure while the concrete is hardened around the cable, and it is only after the concrete has hardened that the device doing the pulling is relaxed. Sometimes the "device" is a tightened bolt on a threaded end of the cable, which is left on afterwards.

San Onofre's containment domes, for all their apparent mass and heft when viewed from the outside, are surprisingly thin and eggshell-like when considered in proportion. Or when it is considered that the containment dome is believed by most people to be strong enough to survive the impact

16-1

Comment Set 16, cont.
Russell D. Hoffman

16-1

of a 747 or an A-380 Airbus, but it can't. It can only survive the impact of much smaller planes -- even smaller than the four 767s used by terrorists on 9-11.

Furthermore, that's not really their purpose. The real purpose of the containment dome is to hold back explosions inside the dome during a meltdown or near-meltdown of the core. These are expected to generate forces less than about 3.5 atmospheres within the dome -- otherwise, the containment dome will burst and once it does, "all hell breaks out."

Evacuate!

Ah, but 3.5 atmosphere is not really all that much. And what if the containment dome, with all its mass, were to fall apart during an earthquake?

Well, they worried a little about that and decided to make the wires a little thicker and put a few more of them in place and tension them a bit tighter and viola! Instant earthquake-proof!

Of course, it's bogus too. Maybe they made what might survive a 6.8 earthquake into something that might survive a 7.4. And maybe they overstressed something and didn't realize it and the containment dome can now only survive a 6.3. Or maybe some of the wires have rusted inside because nobody noticed a wet rag that was dropped into the cement as it was poured, or a tool, that formed a bimetallic contact point. These things most certainly DO happen, although the nuclear industry assumes they don't when they calculate the "safety factor" of their containment domes.

We're talking about a very serious disaster here, and calculations might be "off!" There are so many factors involved. Only a real "test" -- ie, an earthquake -- will tell for sure. But if some big chunk of concrete falls onto a major component of the reactor during a 7.5 or 7.6 earthquake or whatever, then guess what? As one former San Onofre employee put it to me once, "Katie, bar the door!" For 100,000 years.

No nuclear reactor like San Onofre has ever been required to somehow survive a major breakage in the coolant system, such as might be caused by a steam generator being knocked over or disconnected by a large chunk of concrete falling from the ceiling of the containment dome.

None of this is discussed in the North County Times article, however, which only wonders whether, after cracking Humpty Dumpty apart to squeeze in the new steam generators, he can be put back together again correctly.

The article tells us that engineers from San Onofre went up in Northern California to study the shuttered Rancho Seco reactors. But nobody is rebuilding Rancho Seco, and they are not attempting to shake it as if in an earthquake (which would be a Herculean task, and very expensive), so there is a limit to what the San Onofre engineers can learn. According to the article, a couple of other reactors with less earthquake protection have had similar cuts in them and were determined by the NRC to be adequately repaired. The NRC could require a retrofit to the outside of the containment dome to reinforce it, like what is done to bridges all the time around California. Thus, even this tension issue would not cause the reactors to be shut down. Only stopping the Price-Anderson act is likely to do that, since that act absolves the nuclear industry of 99.9% of the costs of a nuclear reactor accident and puts it on the people who are actually harmed by the accident to pay for it themselves.

Without Price-Anderson's protection, San Onofre's owners would never have

**Comment Set 16, cont.
Russell D. Hoffman**

opened the plant. Price-Anderson is a criminal piece of legislation which should never have been enacted. It is unAmerican to absolve someone of responsibility for their actions and yet time and again, we find that that is the only way the nuclear industry can function.

16-1

Yes, the tension around San Onofre is incredible.

Russell D. Hoffman
Concerned Citizen
Carlsbad, CA

Accompanying documents:

- (1) Follow-up letter to the CPUC from Russell D. Hoffman
- (2) Statement about nuclear power, risk, and the CPUC's job
- (3) Follow-up letter by Sharon L. Hoffman to the CPUC
- (4) LA Weekly article about CPUC hearings fails to tell the public the facts; is full of misinformation and inaccuracies
- (5) Contact information for the author of this newsletter

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(1) Follow-up letter to the CPUC from Russell D. Hoffman:
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To: CPUC
From: Russell Hoffman, Concerned Citizen
Re: Where is a concerned citizen supposed to turn?
Date: May 31st, 2005

To whom It May Concern, California Public Utilities Commission

I find it abhorrent that you would claim to this citizen that you are not responsible for nuclear safety issues at San Onofre and Diablo Canyon nuclear power plants -- that these are under the regulatory authority of the Nuclear Regulatory Commission.

16-2

You are in effect telling this citizen that the proper agency to complain to about the lack of safety of nuclear power is the Nuclear Regulatory Commission.

But this citizen has made every reasonable effort to talk to that agency and has been stonewalled in every way. That means the citizen has NOWHERE he can turn. Which means your claim is a hollow one.

Sincerely,

Russell Hoffman
Concerned Citizen
Carlsbad, CA

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(2). Statement about nuclear power, risk, and the CPUC's job:
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The nuclear industry discards as impossible anything with a likelihood less than one in one million. However, when you have thousands of different "one

Comment Set 16, cont.
Russell D. Hoffman

in one million" possibilities of failure, and when many of these so-called one-in-one million possibilities of failure are, in fact, far more likely than that, your aggregate possibility of failure surpasses not just one in one thousand or one in one hundred, but approaches certainty. If we keep the plants open, if we keep the fuel exposed (anywhere on our coast or in our earthquake zones or under a jet path or vulnerable to terrorism), then eventually something will happen. Statistically, it is a near-certainty. The CPUC needs to work from that premise because it is the logical, reasonable, safe, and prudent one."

-- Russell Hoffman, May 31st, 2005

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(3) Follow-up letter by Sharon L. Hoffman to the CPUC:
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To: sanonofre@aspeneq.com
From: "Sharon L. Hoffman" <shoffman@techreflections.com>
Subject: Comments on DEIR 2004101008 (A.04-02-026)

Andrew Barnsdale, SONGS/CPUC
c/o Aspen Environmental Group
235 Montgomery Street Suite 935
San Francisco CA 94104

Dear Mr. Barnsdale,

Please add this correspondence to the official public comments on DEIR 2004101008 (A.04-02-026), concerning steam generator replacement at San Onofre Nuclear Generating Station.

The idea that nuclear power plants and the people who build and run them are 100 percent perfect 100 percent of the time is ludicrous. We accept the probability that airplanes occasionally fall out of the sky -- even without the aid of terrorists. We accept that doctors make mistakes and people die. We accept that gas lines can leak and start fires. We do our best to protect ourselves and society from these dangers. We set standards for quality and investigate when people or parts fail to perform correctly. But we don't assume that perfection is the normal state of engineering or human beings. However, that's exactly what we're asked to believe about nuclear power facilities, because the consequences of failure are unacceptable.

No amount of money can render nuclear waste safe. If one thimbleful was dispersed, it could force the permanent evacuation of a small city. The spent fuel created in just ONE DAY by California's four nuclear plants is over 500 pounds. If a single day's spent fuel were released into the environment, it would make all of Southern California a "hot zone" forever. Instead, the nuclear industry expects us to believe that they can contain all the waste PERFECTLY for far longer than any of humankind's creations have existed.

In asking the CPUC to allow continued operation at San Onofre, which is implied in the steam generator replacement project, SCE is asking the commissioners to believe in perfection. Assuming that the nuclear industry can deliver perfection is like not wearing your seat belt because you believe that you'll never make a mistake as a driver, your car will always function perfectly, and no other driver will ever make a mistake that will involve you in an accident. Even then, the consequences of your arrogance would be limited to a small number of people, but the nuclear industry's

Comment Set 16, cont.
Russell D. Hoffman

arrogance endangers everybody.

In just the past 50 years, society has seen many instances where an activity that was supposed to be harmless, or even beneficial, was later proven to be deadly. In many of these cases, people who tried to alert government and society to the potential hazards were ignored and dismissed, just as those who oppose nuclear power are ignored and dismissed today.

16-2

The history of prenatal x-rays illustrates that what we don't know CAN hurt us. Today, it's commonly accepted that women who are pregnant, or who might even POTENTIALLY be pregnant, should avoid x-rays except in the most serious emergency. But in 1956, when Dr. Alice Stewart published the first studies showing a link between prenatal x-rays and cancer, her findings were ignored by the medical establishment. This example has strong correlations with the danger from nuclear power plants, because medical x-rays -- like the radiation from nuclear plants -- are ionizing radiation, and because even after the proof was presented, most people believed the danger of radiation exposure from prenatal x-rays was insignificant -- just as many people today believe that the danger of radiation exposure from day-to-day nuclear power plant operations is insignificant.

Here is an excerpt from a biography of Dr. Stewart (The Woman Who Knew Too Much: Alice Stewart and the Secrets of Radiation, University of Michigan Press, 1999, ISBN: 0-472-11107-8), that illustrates many aspects of the problem. (The quotes within the excerpt below, are from Dr. Stewart.)

***** beginning of excerpt *****

They published a fuller report in the British Medical Journal in July 1958. There, with an expanded database, they were able to conclude definitively that a fetus exposed to x-ray was twice as likely to develop cancer within the next ten years as a fetus that had not been exposed -- and not only leukemia, but all types of cancer. "We succeeded, within a three-year period, in tracing more than 80 percent of all childhood cancer deaths that had occurred in England between 1953 and 1955, which was a miracle considering that we had no money.

16-3

"We reckoned that a child a week was dying from this practice, which isn't all that many -- though any death caused by a medical practice is very much the wrong side of the tally. We thought that doctors would stop x-raying on the mere suspicion that we were right, and we felt we must hurry to cover all the deaths that occurred in the next ten years, because once they stopped x-raying, there would be no further cases. We needn't have worried; they went right on x-raying, so we went right on monitoring. We went on and on and managed to include all children who died from 1953 onwards. It was a full-time job and kept me close to the data collecting. We spent the next twenty years proving we were right, and we did prove it -- that a single x-ray, a fraction of a permissible exposure, was enough to double the chance of an early cancer. We emerged after twenty years with a genuine finding -- there could be no mistake.

"But it was a very small effect that we'd picked up, and if we hadn't stumbled on it, I doubt that anyone would have."

***** end of excerpt *****

The specific cause of any PARTICULAR cancer or birth defect is difficult to prove, but the STATISTICAL data is compelling. If those in authority had listened to Dr. Stewart, many lives could have been saved. Similarly, despite protestations to the contrary by the nuclear industry, proof exists

Comment Set 16, cont.
Russell D. Hoffman

today that even "routine releases" from nuclear power plants cause cancer, birth defects, and other ailments such as heart disease. The nuclear industry likes to say that nobody has ever died from commercial nuclear power in the United States. In fact, many people have already died and many more will die because of radiation exposure they have already received from nuclear power plants.

16-3

To allow steam-generator replacement paves the way for relicensing and tacitly allows the continued release of radioactive pollutants into the environment on an ongoing basis. Allowing steam generator replacement also allows the plant operators to continue to create more nuclear waste without any prospect that it can be contained for its entire lethal deathspan, and it sets the stage for an accident -- large or small, sooner or later. We've been lucky, not smart, about nuclear power in this country. Davis-Besse, Three Mile Island, and Brown's Ferry could all have been so much worse. The prospect of an accident at San Onofre, whether from terrorism, carelessness, faulty engineering, or human error is too horrible to contemplate. But contemplate it we must, because ignoring it will not lessen the danger.

At the May 12, 2005 public hearings we were told that the DEIR does not consider the potential impacts of relicensing of San Onofre beyond its current license period. We were also told that this exclusion is because SCE has not "officially" applied for a new license to generate nuclear waste and spew it into the environment of Southern California. However, at the May 17, 2005 meeting, Commissioner Brown concurred with the assessment expressed by many citizens -- that if the CPUC approves the steam generator replacement project, SCE will apply for relicensing at San Onofre. If the CPUC allows the steam generator replacement project to proceed, the commissioners are accepting responsibility for all of the death, suffering, and economic devastation that might result from continued operations or an accident at San Onofre.

16-4

Plenty of evidence has been presented to the CPUC in the DEIR hearings to show that the current situation is dangerous, that the steam generator replacement process itself is dangerous, and that all of the electrical power California currently gets from nuclear plants can EASILY be replaced by renewable power sources. I ask the commissioners to deny SCE's application for steam generator replacement and shut down all of California's nuclear power plants immediately.

Sincerely,

Sharon L. Hoffman

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(4) LA Weekly article about CPUC hearings fails to tell the public the facts; is full of misinformation and inaccuracies:
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To the Editor,
LA Weekly

I am disgusted with the article (shown below) about the California Public Utilities Commission's recent San Onofre Steam Generator Replacement Project hearings.

16-5

Hormesis HAS BEEN DEBUNKED as I stated. That is not to say a short-term exercising of the body's immune system does not occur. What is known is

Comment Set 16, cont.
Russell D. Hoffman

16-5

that any such short-term effect is vastly outweighed by the long-term potential consequences such as cancer, leukemia, heart disease, and birth defects, as well as the short-term damage which occurs in the first place and causes the immune system reaction.

It is interesting that your reporter did not mention that when I claimed that Hormesis had been debunked, the Commissioner at the hearing (Commissioner Geoffrey Brown) AGREED WITH ME and suggested I move on to the next topic -- that he didn't believe in it either, and we did not need to discuss it!

On May 27th, 2005, I did, however, send a follow-up letter to the CPUC about the problem of low-level radiation anyway, which I have posted online and urge your readers (and your reporters) to read:
http://www.animatedsoftware.com/enviro/m/onofre/2005/CPUC_SONWGS_SGRP_DEIR20050527.htm

Dr. Helen Caldicott, outspoken critic of nuclear power and Nobel Peace Prize nominee, said of the letter linked to above: "This is a terrific letter!"

The May 27th, 2005 follow-up letter to the CPUC discusses many of the tricks the nuclear industry has used to produce "data" which is bogus, but which appears to gullible reporters as factual. It also references several studies about the health risks of living near nuclear power plants.

The LA Weekly article also leaves the impression that I believe that "low-level exposure to nuclear isotopes is the least of local residents' worries." Anybody who paid any attention to what I said -- or wrote -- would not have claimed I said any such thing. It's true that I believe a meltdown is a greater concern, but I have also repeatedly expressed concern about daily emissions of poison gas from nuclear power plants.

There are numerous other dangers from nuclear power -- proven dangers -- and information about them was presented and backed up with reference material your reporter could have looked at. San Onofre is an accident waiting to happen and it is your reporter's duty to understand ALL aspects of the dangers.

Sincerely,

Russell D. Hoffman
Concerned Citizen
Carlsbad, CA

The writer has studied nuclear power for more than 35 years.

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From: Molly Johnson <mollypj@yahoo.com>
Subject: Split Over Atoms
To: HopeDance <hd-l@slonet.org>

Article from LA Weekly mentions Rochelle and Russell Hoffman. Good article, reporter tries real hard to be objective. Molly

Split Over Atoms
http://news.yahoo.com/news?tmpl=story&u=/laweekly/20050531/lo_laweekly/64413
By JUDITH LEWIS LA Weekly Writer
Tue May 31, 1:53 PM ET

Comment Set 16, cont.
Russell D. Hoffman

16-5

Living near a nuclear reactor, Al Tschaeché wants you to know, is not as scary as it seems. A resident of Encinitas, 30 miles south of the aging nuclear-power plant at San Onofre, Tschaeché suspects he may be subject to a persistent dose of low-level ionizing radiation. This, however, he considers a good thing. I have never seen any good human data that demonstrates low doses are harmful, he told a small audience gathered at the Oceanside Civic Center to discuss the continued operation of the 2,150-megawatt San Onofre Nuclear Generating Station, also known as SONGS. But I have seen demonstrations that show that its beneficial. A little bit of radiation is called hormesis, the chipper retired nuclear physicist explained, and it mobilizes your body to withstand higher doses. He hopes all of his 17 great-grandchildren will enjoy a nuclear-powered world, not just because he considers nuclear power clean, but because low doses are good for you.

A few speakers later came Russell D. Hoffman, a Carlsbad resident who brought with him a small library devoted to nuclear issues including, for texture, the souvenir edition of Atoms for Peace, the document of former President Dwight D. Eisenhower's plan to channel atomic energy for the good of humanity. Hormesis has been thoroughly debunked, Hoffman declared. And anyway, low-level exposure to nuclear isotopes is the least of local residents' worries. If the plant were to melt down, there would be 68,000 casualties, said Hoffman. And that is a government figure.

That didn't scare Tschaeché. Frankly, I'm more concerned about being hit by a tanker full of gas than I am by San Onofre failing, he concluded.

And so went the two town-hall forums the California Public Utilities Commission held in Oceanside and San Clemente on May 17 to determine whether San Diego Gas and Electric (SDG&E) should be released from its ownership interest in SONGS, whose two 20-something steam generators need to be replaced in the next five years to the tune of \$680 million. Southern California Edison (SCE) owns most of the plant, but SDG&E's 20 percent share means it would have to pony up roughly \$135 million to keep the plant running. But even if the CPUC grants the San Diego utilities request, it doesn't mean the reactor shuts down instead, Edison will likely foot the whole bill, pass the cost on to ratepayers, and SDG&E could then simply buy the 430 megawatts of nuclear-generated electricity nearly a half-million homes worth outright from Edison.

The particulars didn't matter much at the meetings, however, which quickly devolved into community brawls over the continued operation of SONGS and atomic energy in general.

At the Oceanside meeting, held midafternoon in a library community room, one speaker insisted that SDG&E take its money and invest it in solar panels, because 100 square miles of solar panels can power all of North America. At the San Clemente meeting, where the California Highway Patrol, tipped off by a nervous local, had come to police the activists mostly neatly dressed, gray-haired retirees a pro-nuclear advocate claimed that nuclear waste wasn't such a big deal. All the spent fuel in the world could fit on a basketball court two stories high, he said. (Close: The Department of Energy's waste-storage metaphor, for power-plant-generated waste only, is a football field 10 feet high.)

Hardly anyone seemed to realize that SDG&E, while bound by state law to draw 20 percent of its energy from renewables by 2010, has no explicit plan to redirect its nuclear investment into wind and solar. (SCE already gets 16 percent of its power from renewables more, said spokesman Ray Golden, than any other public utility in the country.)

Comment Set 16, cont.
Russell D. Hoffman

16-5

I was a little bit frustrated, to tell you the truth, admitted CPUC Commissioner Geoffrey Brown, who presided over the meetings. A lot of people were under the assumption that SDG&E is going green if it pulls out of San Onofre, or that San Onofre is going to shut down if SDG&E pulls out. But that doesn't necessarily follow. For one thing, SDG&E's parent company, Sempra, bases a good portion of its portfolio on the importation of liquefied natural gas from Long Beach or Baja California. And the future of liquefied natural gas storage is by no means certain.

The misinformation on both sides is terribly frustrating, said Rochelle Becker, executive director of the Alliance for Nuclear Responsibility, who has 30 years of experience fighting nuclear power. We've always been so careful to make sure that what we're presenting is both on point and accurate, because all we have is credibility. When a person after a person stands up and means very well but doesn't address the issue before the agency we're speaking to, we're not doing anybody any good.

To be fair, Brown didn't get everything right either. When one speaker brought up Amory Lovins Boulder, Colorado-based Rocky Mountain Institute and its proposed cost-benefit experiment with public utilities and renewable energy, Brown confused the group with the conservative Mountain States Legal Foundation.

As I understand it, the Rocky Mountain Institute is going to promote clean coal, he said. Isn't that Gale Norton's group?

Amid a rumble of protests, Brown's legal counsel, Peter Hanson, piped in, No, that's Lovins, right?

Lovins, by the way, once likened nuclear power to trying to cut butter with a chain saw.

The May 17 forums mirrored many a nuclear-energy debate, alternately long on fear and on can-do optimism, with few agreed-upon scientific facts to bolster either side. With environmentalists such as James Lovelock, the man behind the Gaia hypothesis, coming out in support of nuclear energy as the only solution to global warming, and Bush's energy secretary, Samuel Bodman, promising to streamline the regulatory process, the nuclear industry is enjoying a public-relations heyday the likes of which it hasn't seen since the meltdown at Three Mile Island scared the U.S. public off the technology for decades. But arguments for and against still spill over with fantastical claims and suspect data.

Part of the problem is that much useful information just isn't available even though the health effects of living near a nuclear reactor have yet to be adequately studied. When they built the Diablo Canyon reactor [near San Luis Obispo], we begged and begged the Nuclear Regulatory Commission (NRC) to do a baseline study of cancer risks in the area, Becker said at the Oceanside meeting. But they refused. Without those baseline studies, it's hard to prove that a childhood cancer rate in the vicinity of Three Mile Island 7 percent higher than the national average has anything to do with the reactor there. (Had the cancer rate been lower than average before the plant was built, however, that statistic might be alarming near other reactors, the cancer rate has soared to as much as 45 percent above average.)

Without a baseline, we don't have any credibility on that issue, Becker told me later over the phone. So we stay away from it.

Comment Set 16, cont.
Russell D. Hoffman

16-5

which is unfortunate, because Brown asked repeatedly during the meetings about the health risks, and that data would have meant something to him the possibility still exists for the CPUC to deny SCEs request and shut the plant down before its NRC license expires in 2022. If there were severe cancer rates around San Luis Obispo or Three Mile Island, I sure would be concerned, he said. That would be startling evidence.

But you dont have to wade into the murky depths of health risks to object to rehabbing San Onofre, said Becker. All you have to do is look at whats been happening with Unit 1, which started up in 1968, shut down permanently in 1992 and was slated to be shipped to South Carolina after decommissioning. The still-radioactive reactor debris, encased in concrete, at 700 tons proved too heavy to ship by highway or by barge through the Panama Canal, and the Burlington-Northern & Santa Fe railroad would only transport the unit if it could be absolved of all liability in the event of an accident. And if you cant get rid of the Unit 1 generator, says Becker, how are you going to replace the other two? Already the transport of the two 620-ton generators, ordered from Mitsubishi in Japan, has presented a new point of conflict. Southern California Edison wants to truck them along one of three overland routes, but an environmental study on the project recommends a journey by sea to avoid disturbing the recreating public at the state beach.

People have until May 31 to forward written comments to the CPUC on the initial draft of SCEs proposed steam-generator replacement project, which is available online at www.cpuc.ca.gov/environment/info/aspen/sanonofre/sanonofre.htm. But first, recommends Brown, study the issues and hone your pitch. If youre going to make an assertion, back it up.

Hormesis, incidentally, has not been debunked. The theory that small doses of toxic substances, including radiation, may mobilize the bodys defenses has been demonstrated in perfectly respectable research by University of MassachusettsAmherst professor Edward Calabrese. For the purpose of determining SONGS immediate future, however, thats probably not important. This is an economic proposal based on whether the replacement of the steam generators is cost-effective, Brown said. I doubt were going to solve the issue of low-level radiation this year.

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"See in my line of work you got to keep repeating things over and over and over again for the truth to sink in, to kind of catapult the propaganda."
George Bush

"Should any political party attempt to abolish social security, unemployment insurance, and eliminate labor laws and farm programs, you would not hear of that party again in our political history. There is a tiny splinter group, of course, that believes that you can do these things. Among them are a few Texas oil millionaires, and an occasional politician or businessman from other areas. Their number is negligible and they are stupid." President Dwight D. Eisenhower, 1954

Molly P Johnson
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Comment Set 16, cont.
Russell D. Hoffman

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