DOCKET NUMBER
PROPOSED RULE PR 20
(68 FR 09595)

45

DOCKETED
USNRC

May 15, 2003 (11:40AM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

May 8, 2003

Secretary, US Nuclear Regulatory Commission
Washington, DC 20555

Attn: Rulemaking and Adjudication Staff

Subject: Recycling radioactive waste into the public domain

Dear Secretary:

I served as an officer in the U.S. Navy for 21 years, five of which were at the New London Submarine Base in Groton, CT. This tour of duty introduced me to men serving aboard nuclear powered submarines and made me painfully aware that these servicemen and their families were suffering the outcomes (cancer, birth defects) most likely induced by exposure to radiation.

The dispersal of any radioactive material into the general public is an act of total disregard of the health and well being of all of us, and it is also contrary to the NRC's statutory charge in the Atomic Energy Act to protect the health and safety of the public. For the NRC to permit such dispersal would be a flagrant violation of the expectations the public has for the NRC as an agency constituted to protect and serve the interests of the general public. No child or adult should be involuntarily exposed to radioactive materials.

To back up my position on this subject, I cite the 2003 Recommendations of the European Committee on Radiation Risk (ECRR) edited by Chris Busby with Rosalie Bertell, Inge Schmitze-Fueurhake, Molly Scott Cato and Alexei Yablakov. This report addresses the health effects of ionizing radiation exposure at low doses for radiation protection purposes. I have attached a copy of page 33 of the ECRR 2003, which documents criticisms of the ICRP low dose models made at the European Parliament meeting in February 1988 and failures of Hiroshima study to explain or predict consequences of exposure. The "failure mechanisms" and "notes" confirm the prudent course of action that would bar the distribution of all radioactive materials into the public domain.

I implore you to take this citation into consideration and protect all of us by not permitting the dispersal of any radioactive materials into the general stream of products and fill material.

Thank you very much.

Karl J. Novak

Karl J. Novak
826 Burritt Road
Hinesburg, VT 05461

Template=SECY-067

SECY-02

Table 5.1 Criticisms of the ICRP low dose models made at the European Parliament meeting in February 1988.

Criticism	Author/Presenter
1. Hiroshima basis of risk model flawed because the study and control groups were not representative of a normal population.	Prof. Alice Stewart
2. ICRP basis of risk assessment is undemocratic and biased by the membership and historic provenance of the committee	Dr Rosalie Bertell
3. Hiroshima and all other bases of risk model unable to inform on risk from internal exposure due to averaging and other errors implicit in the units of exposure.	Dr Chris Busby
4. Hiroshima base of risk model did not include contribution from internal exposure from fallout or residual contamination	Several
5. Units of exposure themselves (Sieverts) contain inappropriate value judgments and are not physical units.	Dr David Sumner

Table 5.2 Failures of Hiroshima study to explain or predict consequences of exposure

Failure mechanism	Notes
Inappropriate controls	Both study group and controls exposed to internal irradiation from fallout
Extrapolation from high dose to low dose	Cells killed at high dose, mutated at low dose
Extrapolation from acute to chronic	Variation in cell sensitivity following earlier exposure
Extrapolation from external to internal	External gives homogenous doses (single tracks) whereas internal can give high doses (multiple or sequential tracks) to cells local to the source.
Assumption of linear no threshold	Patently not true
Extrapolation from Japanese to world populations	Different susceptibility of different populations is well established
Extrapolation from war survivors	War survivors selected for resistance
Begun too late and missed early deaths	Total yield not accurate
Excluded illness apart from cancer	Total health detriment ignored for later exposures
Genetic damage modelled on gross abnormality	Missed subtle effects, ignored sex ratio effects on birth rates