

**PRM-51-11
(71FR67072)**

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USNRC

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From: ALBERT GRANT <albert_grant@sbcglobal.net>
To: <SECY@nrc.gov>
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Subject: PRM-51-11

January 10, 2007 (11:41am)

OFFICE OF SECRETARY
RULEMAKINGS AND
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I am writing regarding the petition for rulemaking which was filed with the Commission by Sally Shaw. The petition was published in the Federal Register on November 20, 2006, and has been assigned Docket No. PRM-51-11.

I support the petitioner's request that the NRC prepare a rulemaking that will require that the NRC reconcile its generic environmental impact statement for nuclear power plant operating license renewal applications with current scientific understanding of the health risks of low-level radiation, including but not limited to those discussed in the National Academy of Sciences Health Risks From Exposure to Low Levels of Ionizing Radiation: Biological Effects of Ionizing Radiation (BEIR) VII Phase 2 Report.

The "allowable" levels of radionuclides are NOT conservative. They are based only on the obsolete "standard man", a healthy, white male in the prime of life, and ignore the more vulnerable fetus, growing infant and child, the aged, those in poor health, and women who are, according to the BEIR VII report, 37-50% more vulnerable than the standard man to the harmful effects of ionizing radiation. They do not consider the effects of internal radiation from ingested or inhaled alpha and beta emitters.

It is imperative that the NRC protect all members of the public from all types of excess radiation exposure from nuclear power and its fuel cycle, gamma, alpha, beta, neutron, particulate, fission products, noble gases, etc. Measurement and monitoring should include all forms and pathways, not just gamma at the fence line. The NRC's radiation limits should include accidental releases as well as planned emissions.

It is imperative that the NRC addresses the obsolete radiation standards on which the Generic Environmental Impact Statement is based.

Sincerely,
Donna Grant
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SECY-02

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