

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

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**To:** <SECY@nrc.gov>  
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**Subject:** PRM-51-11

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January 16, 2007 (3:17pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Please consider these comments in revising your radiation standards:

- > \*1) Protect the most vulnerable: \*Please exercise \*precaution\* by  
 > accounting for more vulnerable populations in their standards. Since no  
 > level of radiation dose is safe (see BEIR VII quote below), the best  
 > precaution would be no exposure. However recognizing and regulating for  
 > vulnerable populations is a start. \*\*
- >
- > "In BEIR VII, the cancer mortality risks for females are 37.5 percent  
 > higher. The risks for all solid tumors, like lung, breast, and kidney,  
 > liver, and other solid tumors added together are almost 50 percent greater  
 > for women than men, though there are a few specific cancers, including  
 > leukemia, for which the risk estimates for men are higher." (Summary  
 > estimates are in Table ES-1 on page 28 of the BEIR VII report prepublication  
 > copy, on the Web at <http://books.nap.edu/books/030909156X/html/28.html> .)
- >
- > The BEIR VII report estimates that the differential risk for children is  
 > even greater. For instance, the same radiation in the first year of life for  
 > boys produces three to four times the cancer risk as exposure between the  
 > ages of 20 and 50. Female infants have almost double the risk as male  
 > infants. (Table 12 D-1 and D-2, on pages 550-551 of the prepublication copy  
 > of the report, on the Web starting at <http://books.nap.edu/books/030909156X/html/550.html>)  
 > <<http://books.nap.edu/books/030909156X/html/550.html>>." (excerpted from  
 > <http://www.ieer.org/comments/beir/beir7pressrel.html>)
- >
- > \*2) Recognize "allowable" levels are not safe: \* Your "allowable" levels of  
 > radionuclides are NOT conservative or protective enough. 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 standard man to the harmful effects of ionizing  
 > radiation.
- >
- > \*3) Consider radiation damage from inhaling or ingesting radionuclides: \*Your criteria do not consider the  
 effects of internal radiation from  
 > ingested or inhaled alpha and beta emitters. The amount of polonium-210 that  
 > recently killed a former Russian intelligence officer was considered by IAEA  
 > and NRC to be of the lowest possible risk because they failed to account for  
 > internal radiation damage.
- >
- > \*4) Recognize there is no safe dose: \* Further, regarding low dose  
 > radiation, the BEIR VII panel has concluded, "it is unlikely that a  
 > threshold exists for the induction of cancers... Further, there are  
 > extensive data on radiation-induced transmissible mutations in mice and  
 > other organisms. There is therefore no reason to believe that humans would  
 > be immune to this sort of harm."
- >
- > Please 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. and that  
 > measurement and monitoring should include all forms and pathways, not just

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Template = SECY-067

SECY-02

> gamma at the fence line. Your radiation limits should include accidental  
> releases as well as planned emissions.  
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**From:** "Chelsea Collonge" <[chelseavc@gmail.com](mailto:chelseavc@gmail.com)>

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