

PRM-51-11
(71FR67072)

14

SECY - public comment in support of petition for rulemaking, Docket No. PRM-51-11:

From: <roger@smvoelker.com>
To: <SECY@nrc.gov>
Date: 01/15/2007 3:06 PM
Subject: public comment in support of petition for rulemaking, Docket No. PRM-51-11:

I am resending the following comment because I failed to include my address in the original. Thank you, Roger H. Voelker, 6740 E. Nelson Dr., Tucson, AZ 85730.

DOCKETED
USNRC

January 16, 2007 (3:17pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

----- Original Message -----

From: <roger@smvoelker.com>
To: SECY@nrc.gov
Sent: Mon Jan 15 11:52
Subject: Fwd: public comment in support of petition for rulemaking, Docket No. PRM-51-11:

Dear Sir or Madam:

Please consider following to be my public comment in support of the petition for rulemaking which was filed with the Commission by Sally Shaw and published in the Federal Register on November 20, 2006 as Docket No. PRM-51-11:

We need a new rulemaking process which will reflect the latest findings of the *National Academy of Sciences Health Risks From Exposure to Low Levels of Ionizing Radiation: Biological Effects of Ionizing Radiation (BEIR) VII Phase 2*, for the following reasons:

- 1) Current radiation standards are based on the assumed radiation tolerance of a "standard" healthy adult white male. However, according the BEIR VII findings, women, children and, especially, growing fetuses, are much more vulnerable to the harmful effects of low-level radiation. Radiation standards must be updated to protect all of our citizens, including our most vulnerable.
- 2) There is no safe radiation level. According to BEIR VII, the percentage of those suffering negative health-effects from radiation exposure increases in direct proportion to the amount of radiation received, beginning from zero (*"it is unlikely that a threshold exists for the induction of cancers..."*). In other words, **any** increase in radiation above background levels, no matter how small, will increase the number of cancers and birth defects in exposed populations. Also, assertions that low-level exposure is safe were originally extrapolated from studies involving short-term, high-level exposures (specifically, surviving Hiroshima victims), while ignoring studies that show the ill-health effects of long-term, low-level exposure.

Template = SECY-067

SECY-02

3) Current NRC standards do not consider the effects of internal radiation from ingested or inhaled alpha and beta emitters. Alpha particles do not penetrate the skin, so external exposure is harmless. However, internal exposure from ingestion or inhalation can be deadly. The amount of polonium-210 that recently killed a former Russian intelligence officer was considered by the IAEA and NRC to be of the lowest possible risk because they failed to account for internal radiation damage.

Roger H. Voelker
6740 E. Nelson Dr.
Tucson, AZ 85730

Mail Envelope Properties (45ABDED7.DB3 : 8 : 3507)

Subject: public comment in support of petition for rulemaking, Docket No. PRM-51-11:
Creation Date Mon, Jan 15, 2007 3:06 PM
From: <roger@smvoelker.com>
Created By: roger@smvoelker.com

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