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From: "FIELS, CRAIG O." <cofiels@ci.santa-fe.nm.us>
To: <SECY@nrc.gov>
Date: Tue, Jan 16, 2007 2:58 PM
Subject: APPROVE A PETITION FOR RULEMAKING THAT WOULD IMPROVE RADIATION PROTECTION STANDARDS AT OLDER REACTORS.

January 16, 2006

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USNRC

January 16, 2007 (3:17pm)

Secretary, U.S. Nuclear Regulatory Commission

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Secretary:

Please approve a petition for rulemaking that would improve radiation protection standards at older reactors. See the following details.

1) Protect the most vulnerable: The NRC needs to 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.

2) Recognize "allowable" levels are not safe: Currently the NRC's "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: The NRC needs to 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."

In closing, I believe that the NRC should 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

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products, noble gases, etc. and that measurement and monitoring should include all forms and pathways, not just gamma at the fence line. It's also important to note that radiation limits should include accidental releases as well as planned emissions.

Sincerely,

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