

PRM-51-11
(71FR67072)

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Date: Wed, Jan 17, 2007 12:15 PM
Subject: Account for children and fetuses in radiation standards.

From Marvin I Lewis
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To Secretary
USNRC
Washington, D. C. 20555

DOCKETED
USNRC

January 17, 2007 (4:00pm)

Re PRM-51-11
<http://www.epa.gov/fedrgstr/EPA-IMPACT/2006/November/Day-20/i19568.htm>

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Commissioners,
Sally Shaw filed a request for an hearing which was followed by a Federal Register Notice. I am sending in my comments that a hearing is necessary and why.
I also suggest that the basis which Ms Shaw presents are not inclusive and that the hearing should allow all appropriate issues to be heard which are not sufficiently covered in the GEIS and the specific EISs for all older reactors. The White House has stated on many occasions to the media that the attack upon World Trade Center could not be predicted, and I believe that the same standard should apply to nuclear power plants. Nuclear power plants should also be 'hardened' against terrorist attack, aging in inadequately engineered ways, and many other issues which have been raised in the decades since nuclear power has issued upon the commercial scene. For example, Commissioner Jaczko stated on 3-8-06, It is twenty yrs later and we are still dealing with the same issue, now further complicated by recently discovered chemical interactions with the reactor coolant and other substances in containment,"
Com. Jaczko comments refer to nuclear power plants cooling system, but they do relate to the fact that our knowledge increases as far as nuclear effects are concerned.
Com Jaczko continues in the same speech," Instead we have had to do a lot to deal with this issue (containment) and this has taken resources away from more safety significant challenges."
The commissioner fails to specify what are the "more significant safety issues." I believe that the public should know what these 'more significant safety issues' are, and said issues be added to the contentions in this hearing. I have operating nuclear power plants near me. I have a right to know if I am safe , and if dangerous conditions are being adequately addressed in nuclear power plants near me. When a Commissioner on the NRC states that resources are being taken away from 'more significant safety issues' , I want to see how these issues are being addressed.. To clarify my position completely, I quote from an old movie, "IS IT SAFE?" (The Marathon

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SECY-02

Man.)

Exploring the present knowledge vs older knowledge issue, I suggest that the hearing explore the issues raised in several recent reports by the BIER Committee and ICRP on the issue of radiation damage and radiation protection.

The BEIR Report refers to the report of the Biological Effects of Ionizing Radiation VII. This is an extensive report in which many of the bases used in the NRC calculations for health effects are contradicted. One item is that the NRC uses a 'standard man' as its basis for calculating health effects. The so-called standard man is fully matured and healthy. BEIR VII states that risks for females and children is much larger than for a 'standard man.' That would cause the calculations for risks using the NRC's 'standard man' to be much lower than actually experienced by a population at risk unless the population at risk is composed totally of 'standard men.' The population of the US has 51% women and many children who are inaccurately considered in the risk calculations.(US Census data)

The ICRP report is a much more extensive. It also comes to the conclusions that the risk is greater than used by the NRC. I suggest that the latest addendums and updates to the ICRP report be used in the proposed hearings as there are many surprises which recent analysis have unearthed. These reports are available on the internet at ICRP.org and ICRP refers to the International Committee on Radiation Protection.

Another problem with the risk calculations is that only the particular nuclear power plant in question is considered as the total source of radiation exposure. Radiation exposure comes from many sources and the NRC and DOE have attempted and continue to attempt to add radiation exposures from many sources to the risk which the public faces. This means that a resident near an atomic power plant might be exposed to the maximum allowed from the power plant, the maximum allowed from many separate sources such as low level radioactive waste in sewage and low lever radioactive waste from lost gages, and what ever and where ever.

The NRC's calculation of radiation exposures and risks reminds me of this Administration's Iraqi war philosophy: slash and burn. Slash and burn did not make us safe in the Middle East. There is no reason to believe that the NRC's radiation risk calculations will make the general public safe.

I wish that I could say,
Respectfully submitted,
Marvin I. Lewis, R. P. E. (Retired.)
1-17-2007

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Subject: Account for children and fetuses in radiation standards.
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Files

MESSAGE
Mime.822

Size

5038
7211

Date & Time

Wednesday, January 17, 2007 12:14 PM

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled