

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

DOCKETED  
USNRC

January 23, 2007 (4:30pm)

**From:** Phoebe Mills <phoebemills@yahoo.com>  
**To:** <SECY@nrc.gov>  
**Date:** Tue, Jan 23, 2007 9:32 AM  
**Subject:** Docket No. PRM-51-11

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Please follow the precautionary principle in regulating radiation emitted by nuclear power plants. In other words, please exercise precaution by accounting for more vulnerable populations in your standards. Since no level of radiation dose is safe, the best precaution would be no exposure. However, that is unrealistic since radiation is part of so many aspects of our lives. Thus, exposure levels recognizing vulnerable populations is a start.

22

Please recognize the fact that the current "allowable" levels are not safe. Such "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. As a result, it ignores the more vulnerable fetus, growing infant and child, the aged, those in poor health, and women all of whom are more vulnerable than the "standard man" to the harmful effects of ionizing radiation.

Please consider radiation damage from inhaling or ingesting radionuclides. The NRC does 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.

The NRC must 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.

Than you for your consideration,  
Phoebe Mills  
POB 916  
South Londonderry, VT 05155

Template=SECY-067

SECY-02

**Mail Envelope Properties** (45B61C5C.261 : 0 : 33377)

**Subject:** Docket No. PRM-51-11  
**Creation Date** Tue, Jan 23, 2007 9:31 AM  
**From:** Phoebe Mills <phoebemills@yahoo.com>

**Created By:** phoebemills@yahoo.com

**Recipients**

nrc.gov  
TWGWPO02.HQGWDO01  
SECY (SECY)

**Post Office**

TWGWPO02.HQGWDO01

**Route**

nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1832	Tuesday, January 23, 2007 9:31 AM
TEXT.htm	2375	
Mime.822	6021	

**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