

PRM-51-11
(71FR67072)

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From: tanya balsley <mountainbrookcenter@yahoo.com>
To: <SECY@nrc.gov>
Date: Tue, Jan 23, 2007 11:30 PM
Subject: petition-PRM-51-11

DOCKETED
USNRC

January 24, 2007 (4:45pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

To The NRC,

I am writing to request that you approve a petition for rulemaking that would improve radiation protection standards at older reactors.

Improving these protection standards would take into account the more vulnerable members of our community, in particular children, women and those who are in less than perfect health. I do not believe that any dose of radiation is safe for anyone, however recognizing and regulating for vulnerable populations is a start. The BEIR VII report states explicitly that children and women are at significantly higher risk from exposure than men.

Your current "allowable" levels of radionuclides are not conservative or protective enough because they are based only on the "standard man" and ignore the much more vulnerable populations of fetus, growing infant and child, the aged and those in poor health and women who are, according to the BEIR VII report, 37-50% more vulnerable than the "standard man" to the harmful effects of ionizing radiation.

The NRC's current standards also ignore 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.

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."

I demand that the NRC 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 gamma at the fence line.

I further demand that radiation limits should include accidental releases as well as planned emissions.

Petitioner's Request

The petitioner requests that the NRC prepare a rulemaking that would require that the NRC reconcile its GEIS for nuclear power plant operating license renewal applications with the National Academy of Sciences (NAS) Health Risks From Exposure to Low Levels of Ionizing Radiation: BEIR VII, Phase 2 which was released in 2005. AND OTHER RECENT SCIENCE! The petitioner asserts that the GEIS relies upon an earlier NAS report, the BEIR V, with was released in 1990. According to the NAS Web site, the BEIR VII updates the information contained in the BEIR V and draws upon new data in both epidemiologic and experimental research.

The petitioner requests that NRC consider the NAS BEIR VII report as new and significant information and recalculate certain conclusions set forth in the GEIS, including early fatalities, latent fatalities and any injury projections based on this information.

Thank You,

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