

**PRM-51-11  
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**From:** Dinda Evans <dindamcp4@yahoo.com>  
**To:** <SECY@nrc.gov>  
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**Subject:** radiation non standards

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
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25

This gets to exactly what I have been screaming about since the Hartsville Nuclear Plant Intervention hearings, where TVA opposed putting filters on the ventilation systems of the turbine buildings and the reactor buildings, on what was supposed to have been the world's largest nuclear power plant.

Instead of calculating the dose to a one year old child drinking milk from a cow that would have grazed near that plant, using the then in force guideline 1.42, that calculated a dose of 335 mrems per year, when the allowable dose to the thyroid was 15 mrems per year, TVA devised their own calculation model, TVA model 2, that brought the dose down to 11.1 mrems. How convenient.

Instead of TVA enforcing their regulations, they **ABOLISHED GUIDELINE 1.42 AND ESTABLISHED A NEW GUIDELINE 1.109, THAT IS STILL BEING USED TODAY.**

They brought the dose down to 1.1, another 10 fold deduction I have been begging for people to examine these guidelines to see how they did it. Sally points out two things.

(1) Instead of using a 1 year old child, they substituted a "standard man" who is far more resistant to radiation than women, children, and especially fetuses.

(2) They do not consider ingested radiation. This is criminal. Ingested or inhaled radiation is hundreds of times more dangerous than surface radiation. This is the secret to the the nuclear revival. This is how the government gets away with calling nuclear plants "emission free."

This must be stopped.

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