

PRM-51-11
(71FR67072)

From: Megan Hawthorne <meghawthorne@yahoo.com>
To: <SECY@nrc.gov>
Date: Fri, Jan 26, 2007 3:17 PM
Subject: Docket No. PRM-51-11

1/25/07

Dear NRC

DOCKETED
USNRC

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January 29, 2007 (3:22pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Exercise Precaution:

1) Protect the most vulnerable: Exercise precaution by accounting for more vulnerable populations in your 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.

"In BEIR VII, the cancer mortality risks for females are 37.5 percent higher. The risks for all solid tumors, like lung, breast, and kidney, liver, and other solid tumors added together are almost 50 percent greater for women than men, though there are a few specific cancers, including leukemia, for which the risk estimates for men are higher." (Summary estimates are in Table ES-1 on page 28 of the BEIR VII report prepublication copy, on the Web at <http://books.nap.edu/books/030909156X/html/28.html>.)

The BEIR VII report estimates that the differential risk for children is even greater. For instance, the same radiation in the first year of life for boys produces three to four times the cancer risk as exposure between the ages of 20 and 50. Female infants have almost double the risk as male infants. (Table 12 D-1 and D-2, on pages 550-551 of the prepublication copy of the report, on the Web starting at <http://books.nap.edu/books/030909156X/html/550.html>)." (excerpted from <http://www.ieer.org/comments/beir/beir7pressrel.html>)

2) Recognize "allowable" levels are not safe: Your "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: You do not consider, and you should, 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 you to be of the lowest possible risk because you failed to account for internal radiation damage.

4) You must 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

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would be immune to this sort of harm."

You 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. Your measurement and monitoring should include all forms and pathways, not just gamma at the fence line. Your radiation limits should include accidental releases as well as planned emissions.

Sincerely yours, Megan Hawthorne, 850 Meadowbrook Road, Brattleboro, VT 05301

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