

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

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**From:** "Louise Gorenflo" <lgorenflo@gmail.com>  
**To:** <SECY@nrc.gov>  
**Date:** Fri, Feb 2, 2007 10:52 AM  
**Subject:** Docket No. PRM-51-11.

DOCKETED  
USNRC

TO: NRC  
RE: Docket No. PRM-51-11. Published in the Federal Register on November 20, 2006  
From: Louise Gorenflo  
185 Hood Drive  
Crossville, TN 38555

February 5, 2007 (10:40am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

The NRC has published for public comment a notice of receipt of a petition for rulemaking which was filed with the Commission by Sally Shaw. The petitioner requests that the NRC prepare a rulemaking that will require that the NRC reconcile its generic environmental impact statement for nuclear power plant operating license renewal applications with current scientific understanding of the health risks of low-level radiation, including but not limited to those discussed in the National Academy of Sciences Health Risks From Exposure to Low Levels of Ionizing Radiation: Biological Effects of Ionizing Radiation (BEIR) VII Phase 2 Report.

I urge the NRC to approve the petition for rulemaking that would improve radiation protection standards at older reactors.

- 1) The NRC needs to protect the most most vulnerable populations: women of child bearing age and children.
- 2) The current NRC "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) The NRC needs to 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.
- 4) NRC needs to 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 would be immune to this sort of harm."

The NRC needs to 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. Argue that their radiation limits should include accidental releases as well as planned emissions.

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SECY-02

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