

PRM-51-11
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USNRC

From: <NancyBurtonCT@aol.com>
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Subject: Sally Shaw Rulemaking Petition Comments

February 6, 2007 (11:56am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

CONNECTICUT COALITION AGAINST MILLSTONE
www.MothballMillstone.org (<http://www.MothballMillstone.org>)

(66)

February 5, 2006

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff.

Docket No. PRM-51-11

Re: Amending 10 CFR Part 51/Comments regarding the biological effects of ionizing radiation on the determination of relicensing

Dear Secretary:

The Connecticut Coalition Against Millstone supports the petition for rulemaking submitted by Sally Shaw as above referenced and as published in the Federal Register on November 20, 2006.

The petitioner requests that the NRC prepare a rulemaking that will require NRC reconcile its generic environmental impact statement for nuclear power reactors 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.

We agree that the current standards fail to protect the most vulnerable: infants, young children, the unborn, the infirm and the elderly. These populations must be accounted for. As no level of radiation dose is safe (see BEIR VII excerpt, below), the best precaution would be no exposure. However recognizing and regulating for vulnerable populations is a necessary 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_](http://books.nap.edu/books/030909156X/html/28.html) (<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

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prepublication copy of the report, on the Web starting at [_http://books.nap.edu/books/030909156X/html/550.html_](http://books.nap.edu/books/030909156X/html/550.html) (<http://books.nap.edu/books/030909156X/html/550.html>))." (excerpted from [_http://www.ieer.org/comments/beir/beir7pressrel.html_](http://www.ieer.org/comments/beir/beir7pressrel.html) (<http://www.ieer.org/comments/beir/beir7pressrel.html>))

It is imperative for the NRC to recognize "allowable" levels are not safe: they 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.

We believe it is imperative that the NRC standards consider radiation damage from inhaling or ingesting radionuclides: presently, 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.

We call upon the NRC 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." Therefore, we 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. Radiation limits should include accidental releases as well as planned releases.

We thank you for your serious consideration of these comments.

Sincerely,

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