

PRM-51-11  
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SECY - PRM-51-11

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From: "Dolph Honicker" <djhonicker@msn.com>  
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Subject: PRM-51-11

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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Secretary, U. S. Nuclear Regulatory Commission  
Attn: Rulemaking and Adjudications staff.  
Re: PRM-51-11

Comments regarding the Biological Effects of Ionizing Radiation on the Determination of Relicensing:

The Nuclear Regulatory Commission should revise its calculation methods for determining radiation doses to people. Guideline 1:109, which replaced guideline 1:42, reduced the calculated dose at TVA's Hartsville Nuclear Power Plant site, from 335 mrems, which a one year old child would have been expected to receive from drinking milk from a cow that would have grazed near that plant, using guideline 1/42, down to 1.1 mrems, using guideline 1:109. Guideline 1:109 is still in use today. It should be replaced with a guideline that calculates the damage to fetuses as the most susceptible group to radiation, rather than a "standard man."

Internal doses, from ingestion and inhalation, must be considered. Scientific studies have consistently shown them to be significantly more hazardous than external doses. To ignore them is reckless, and has changed the perception of the NRC to the public that you are charged with protecting from "Watch Dog," to "Lap Dog."

I reference the comment sent in today by Joseph J. Mangano, and include his statement as my concerns as well.

I also reference the latest National Academy of Sciences Report, Bier VII, which acknowledged that there is no threshold for low level radiation.

Respectfully submitted,

Jeannine Honicker, Concerned Citizen  
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SECY-02

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