

Doris Mendiola - Pilgrim Watch- Draft NUREG-1437, Supplement 29 -Add itional Comment

From: "Mary Lampert" <mary.lampert@comcast.net>  
To: <PilgrimEIS@nrc.gov>  
Date: 02/14/2007 5:14 PM  
Subject: Pilgrim Watch- Draft NUREG-1437, Supplement 29 -Add itional Comment

Pilgrim Watch requests that the attached additional comment is added to comments we submitted on the Draft Supplemental Environmental Review (SEIS), February 5, 2007.

Please acknowledge receipt by return email.

Thank-you,

Mary

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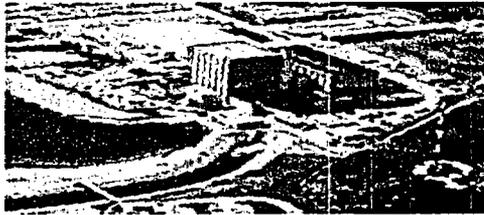
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## **Pilgrim Watch**



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February 14, 2007

### **DRAFT SUPPLEMENTAL ENVIRONMENTAL REVIEW (SEIS) – Draft NUREG-1437, Supplement 29 –Additional Comment**

Pilgrim Watch requests that the following additional comment is added to comments we submitted on the Draft Supplemental Environmental Review (SEIS), February 5, 2007.

#### **I. RADIOLOGICAL IMPACTS ON HUMAN HEALTH [4.2.2]**

The Draft SEIS states the following:

##### **4.2.2 Electromagnetic Fields-Chronic Effects**

In the GEIS, the chronic effects of 60 hertz electromagnetic fields from power lines were not designated as Category 1 or 2, and will not be until a scientific consensus is reached on the health implications of these fields.

The potential for chronic effects from these fields continues to be studied and is not known at this time. The National Institute of Environmental Health Sciences (NIEHS) directs related research through the U.S. Department of Energy (DOE). The 1999 report of the NIEHS and DOE Working Group (Portler and Wolfe 1999) contains the following conclusion:

The NIEHS concludes that ELF-EMF (extremely low frequency-electromagnetic field) exposure cannot be recognized as entirely safe because of weak scientific evidence that exposure may pose a leukemia hazard. In our opinion, this finding is insufficient to warrant aggressive regulatory concern. However, because virtually everyone in the United States uses electricity and therefore is routinely exposed to ELF-EMF, passive regulatory action is warranted such as a continued emphasis on educating both the public and the regulated community on means aimed at reducing exposures. The NIEHS does not believe that other cancers or non-cancer health outcomes provide sufficient evidence of a risk to currently warrant concern.

This statement is not sufficient to cause the staff to change its position with respect to the chronic effects of electromagnetic fields. The staff considers the GEIS finding of "not applicable" still appropriate and continues to follow developments on this issue.

Pilgrim Watch disagrees with the staff's conclusion. The Draft SEIS states that, "The NIEHS concludes that ELF-EMF (electromagnetic fields from power lines) exposure cannot be recognized as entirely safe because of weak scientific evidence that exposure may pose a leukemia hazard." Pilgrim Watch argues that the evidence is not weak at all. In fact, the epidemiologic evidence is quite strong- virtually all studies, and there have been many, of this issue have found evidence that living within some distance of power lines increases the risk of childhood leukemia. It is very notable that not one but two pooled analyses, in which the results of multiple studies are statistically combined, have found evidence of a significant risk.<sup>1</sup> The fact that we don't know why this happens mechanistically is irrelevant in light of such strong statistical evidence.

Therefore the chronic effects of electromagnetic fields should be considered; and especially as it adds to the cumulative health impact and burden on the population exposed to Pilgrim's releases of ionizing radiation.

Submitted by,

Mary

Mary Lampert

Pilgrim Watch, Director

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<sup>1</sup> Greenland S, Sheppard AR, Kaune WT, Poole C, Kelsh MA, *A pooled analysis of magnetic fields, wire codes, and childhood leukemia*, Childhood Leukemia-EMF Study Group Epidemiology. 2000 Nov; 11(6):624-34. Review; and Ahlbom A, Day N, Feychting M, Roman E, Skinner J, Dockerty J, Linet M, McBride M, Michaelis J, Olsen JH, Tynes T, Verkasalo PK., *A pooled analysis of magnetic fields and childhood leukaemia*, Br J Cancer. 2000 Sep; 83(5):692-8.