

PUBLIC SUBMISSION

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Docket: NRC-2009-0279
Potential Changes to Radiation Protection Regulations

Comment On: NRC-2009-0279-0086
Radiation Protection; Advance Notice of Proposed Rulemaking; Extension of Comment Period

Document: NRC-2009-0279-DRAFT-0109
Comment on FR Doc # 2014-27519

Submitter Information

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General Comment

Thank you for taking comments on NRC-2009-0279-0086.

This is an unhelpful proposition. Tightening radiation regulations will only serve to strangle not only the nuclear industry, but any other group which is occasionally exposed to radiation: medical, mining, security, etc.

This proposed rule is not based on actual safety concerns, but merely an administrative/political move to "achieve greater alignment between the NRC's radiation protection regulations and the 2007 recommendations of the International Commission on Radiological Protection (ICRP)". This is completely unnecessary as the NRC is already the gold standard of safety around the world. These changes will do nothing to actually increase safety, but will only add costs. By this fiscal metric, one could consider this proposed regulatory ratcheting to be anti-nuclear in basis.

Instead, I would prefer the NRC to loosen it's radiological standards. Instead of As Low As Reasonably Achievable (ALARA) lets substitute As High As Relatively Safe (AHARS)!
http://www.radiationandreason.com/uploads//enc_ChaplinSubmission.pdf

Daily/weekly limits could be doubled, with weekly/monthly limits tripled. I would completely eliminate any annual or lifetime limits. Many of the reasons can be best explained by Scientists for Accurate Radiation Information (SARI). <http://radiationeffects.org/2014/08/21/hormesis-by-low-dose-radiation-effects-low-dose-cancer-risk-modeling-must-recognize-up-regulation-of-protection/>

If child car restraint systems had a similar level of safety, all cars transporting kids would be required to have NASCAR style roll bars and child seats welded into the center of the vehicle - with special air-bag curtains and a 911 transponder also installed. Safety is a good thing, but at some point it not only becomes ridiculous but

prohibitive. Becoming prohibitive of the already safe nuclear industry could be construed as tacitly promoting fossil fuels or renewables. I don't believe the NRC is supposed to be advocating any energy industry, even indirectly.

Let's follow sensible solutions based on science, not political or administrative expediency. Being among the safest is safe enough. Let Europe and Asia strive to meet our safety standards by loosening their radiation protection guidelines instead.