

<b>As of:</b> 7/24/15 12:09 PM <b>Received:</b> July 24, 2015 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1jz-8k5p-pvw4 <b>Comments Due:</b> September 08, 2015 <b>Submission Type:</b> Web
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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0057

Linear No-Threshold Model and Standards for Protection Against Radiation

**Comment On:** NRC-2015-0057-0010

Linear No-Threshold Model and Standards for Protection Against Radiation; Notice of Docketing and Request for Comment

**Document:** NRC-2015-0057-DRAFT-0062

Comment on FR Doc # 2015-15441

## Submitter Information

**Name:** Anonymous Anonymous

## General Comment

Dear Sirs and Madams:

Take into consideration these studies showing LOW LEVEL radiation can be harmful >

>> @ 7.3 to 21.3 mSv = heart disease increase in arterial hypertension risk  
<http://www.ncbi.nlm.nih.gov/pubmed/22647907>

>> @ 8.6 mSv for men and 1.2 mSv for women = The study has demonstrated a strong positive association between radiation dose and the risk of Cardiovascular Disease mortality.  
<http://www.ncbi.nlm.nih.gov/pubmed/19329385>

>> @ 10 mSv = The excess relative risk for both sexes, estimated to be 3.0% per 10 mSv :for all cancers combined  
<http://www.ncbi.nlm.nih.gov/pubmed/9753011>

>> @ 10 mSv = All cancer mortality was estimated to increase 4.98% per 10-mSv cumulative dose received after age 45 under a 10-year lag, and 7.31% per 10-mSv cumulative dose received after age 45 under a 20-year lag  
<http://www.ncbi.nlm.nih.gov/pubmed/10417363>

>> @ 19 mSv = The most comprehensive study of nuclear workers by the IARC, involving 600,000 workers exposed



{4} National Academy of Sciences Abstract: <http://www.pnas.org/content/100/24/13761.long>

- \* Studies show increases in leukemia in children under 5 years of age who got 1.5 mSv to bone marrow.
- \* A dose of 10 mSv to the embryo and fetus causes "a significant and quantifiable increase in the risk of childhood cancer."
- \* A Canadian study found a "statistically significant excess cancer incidence and mortality risks for solid cancers at an average dose of 6.5 mSv
- \* An average dose of 34 mSv shows a significant "increase in solid-cancer-related mortality."
- \* a significant excess risk for acute leukemia was seen in individuals who died at younger than 20 years of age and who received bone-marrow doses from 6 to 30 mGy
- \* At 40 to 70 mSv, a statistically significant increase in thyroid cancer risk was found

{5} Dr. Ernest Sternglass explains how LOW dose radiation is more dangerous than realized:

Quoting Dr. Ernest Sternglass:

"And the nature of this curve is such that if you decrease it by 10, the risk per millirad goes up tenfold. If you go down another 10, the risk keeps going up, and therefore we have a strange situation that the weaker the radiation intensity is, the more deadly it is, and nobody anticipated this and present radiation standards do not believe in this and have not accepted this because it goes against the existing regulations, which govern all uses of radiation everywhere, and nobody wants to touch this, although the BEIR Committee of the National Academy called attention to it years ago in the earlier report, BEIR III, and, so, we now find that we have a situation where we have far greater health effects than we ever thought."

<http://nsarchive.gwu.edu/radiation/dir/mstreet/commeet/meet12/trnsc12a.txt>