## **PUBLIC SUBMISSION**

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**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**

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## **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

 $\gg$  @ 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

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

to an average cumulative dose of 19mSv, showed a cancer risk consistent with that of the A-bomb survivors. http://www.smh.com.au/federal-politics/society-and-culture/dont-be-fooled-by-the-spin-radiation-is-bad-20110407-1d63z.html#ixzz2pgYQAAh5

>> @ 22.5 mSv = A mean cumulative dose of 22.5 mSv = A significant ERR/Sv was found for myeloid leukaemia. http://www.ncbi.nlm.nih.gov/pubmed/23716722

>>@<100 mSv

Protracted exposure to low-level radiation is associated with a significant increase in the risk of leukemia, according to a long-term study published Thursday in a U.S. research journal.

78 percent to below 100 millisieverts, indicating the impact on health of low-level exposure is not negligible.

http://www.japantimes.co.jp/news/2012/11/09/news/exposure-to-low-level-radiation-can-cause-leukemia-u-s-ukraine-study-of-chernobyl-cleanup-workers-finds/#.UsuJ2Hso5yQ

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Studies proving dangers of low-level radiation:

{1} "The effects of natural variation in background radioactivity on humans, animals and other organisms" - Anders P. Mller1,\* and Timothy A. Mousseau2

which states: "Third, these negative effects of radiation on mutations, immunology and life history are inconsistent with a general role of hormetic positive effects of radiation on living organisms."

http://onlinelibrary.wiley.com/doi/10.1111/j.1469-185X.2012.00249.x/abstract;jsessionid=5BC4E92A9C9CC4CE2ED064299EA8C07B.d03t03

{2} "Cancer risk related to low-dose ionizing radiation from cardiac imaging in patients after acute myocardial infarction"

"For every 10 mSv of low-dose ionizing radiation, there was a 3% increase in the risk of age- and sexadjusted cancer

over a mean follow-up period of five years (hazard ratio 1.003 per milliSievert, 95% confidence interval 1.0021.004).

http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3050947/?tool=pubmed

{3} You must watch this entire presentation regarding research from Dr. Wertelecki, Dr. Yablokov, Dr. Wing, Dr. Fairlie,

Dr. Mangano, Dr. Abrams regarding LOW LEVEL radiation health effects:

http://www.totalwebcasting.com/view/?id=hcf

{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 mSy

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