

PUBLIC SUBMISSION

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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

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Comment on FR Doc # 2015-15441

Submitter Information

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General Comment

Woods Hole Oceanographic Institution (WHOI):

Issue 1.) WHOI previously addressed Radiation Health Risks: How can we assess impacts of exposures?

By David Pacchioli :: Originally published online May 8, 2013

<https://www.who.edu/oceanus/viewArticle.do?id=167749>

Regarding "Radiation and Human Health: Exposure" clarification was provided as follows:

"Alpha Particles are relatively large and slow. They can't penetrate skin, but if inhaled or ingested, their size and energy can cause more damage than other forms of radiation."

"Beta Particles have 1/2000th the mass of alpha particles. They can penetrate skin, but their smaller size reduces their potential to cause damage."

"Gamma Rays have high energy, but no mass or charge. They can pass through tiny spaces between cells without causing disruption, but can cause damage if they hit cellular structures."

CONCLUSION 1.) All forms of radiation can cause damage.

Issue 2.a.) WHOI provided a News Release entitled "Trace Amounts of Fukushima Radioactivity Detected Along Shoreline of British Columbia FOR IMMEDIATE RELEASE"

April 6, 2015

<https://www.who.edu/page.do?pid=83397&tid=3622&cid=213669&c=2>

Following are highlights from the news release:

"Scientists at the Woods Hole Oceanographic Institution (WHOI) have for the first time detected the presence of small amounts of radioactivity from the 2011 Fukushima Dai-ichi Nuclear Power Plant accident in a seawater sample from the shoreline of North America. The sample, which was collected on February 19 in Ucluelet, British Columbia...."

"Radioactivity can be dangerous..." said Ken Buesseler, a marine chemist at WHOI who has been measuring levels of radioactivity in seawater samples from across the Pacific since 2011.

CONCLUSION 2.a.) Small amounts of radioactivity can be dangerous and a seawater sample taken off the North American Pacific Coast, British Columbia, (Canada) proved presence.

Issue 2.b.)

The Headlines pertaining to the North American Pacific Coast in British Columbia (Canada) are:

"World in 'biomass crisis,' new report finds" by Our Vancouver, CBC News Posted: Jun 28, 2015

"British Columbia (Canada) has already begun to see the effects of the mass die off."

<http://www.cbc.ca/news/canada/british-columbia/world-in-biomass-crisis-new-report-finds-1.3131113>

Furthermore...

A query of Google with the key words "mass die-offs in British Columbia" yields the following of about 1,590,000 results - indeed a vast amount:

https://www.google.com/?gws_rd=ssl#q=mass+die-offs+in+British+Columbia

Sea star wasting syndrome sees mass 'die-off' of starfish ...

Apr 17, 2015 - Experts studying the mysterious dying-off of sea stars on North ... Sea star wasting syndrome sees mass 'die-off' of starfish along B.C. coast ...

Cassin auklets found washed up near Tofino - British ... - CBC

Jan 6, 2015 - Mass die-offs of Cassin's auklets, small, white-bellied grey birds, have been reported from British Columbia to San Luis Obispo, Calif.

Mass Death of Seabirds in Western U.S. Is 'Unprecedented'

Jan 24, 2015 - ... Charlotte Islands) off central British Columbia. Since then the deaths haven't stopped. Researchers are wondering if the die-off might spread ...

In hot water: Columbia's sockeye salmon face mass die-off

Jul 27, 2015 - In hot water: Columbia's sockeye salmon face mass die-off for Salmon run threatened by 'unprecedented' British Columbia mining spill ...

Additionally...

A query of ENENews with the key words "mass die-offs in British Columbia" yields:

<http://enenews.com/?s=mass+die-offs+in+British+Columbia>

August 13th, 2015

Giant whales found dead up & down Pacific NW coast, scientists 'baffled' over surge 25+ carcasses reported in past month Gov't: "Troubling... Definitely a pulse of deaths" Experts:

"Alarming spike... Exceptionally rare to see a dead humpback" Concerns about unidentified pathogen (PHOTOS)

February 8th, 2015

TV: Shellfish disappearing along west coast, nobody knows why Has become systemic crisis Finding Pacific shellfish 'next to impossible' Manager: "Recently there's no local scallops at all, supply gone" Chef: Began a few months ago, oyster farms flourishing for years all of a sudden had to shut down (VIDEOS)

February 28th, 2014

Massive die-off of oysters and scallops in Pacific Northwest: "Millions of shellfish dying" Never seen anything like it "By July mortality hit 95 to 100 per cent" "Deformed shells, smaller in size" "Cause is unknown, but ocean acidification is main suspect" (AUDIO)

CONCLUSION 2.b.) What changed? Small amounts of radioactivity (radiation) [per WHOI] is inducing mass die-offs [per results published in the news].

FINAL CONCLUSION

The proof (dead sea creatures) clearly indicates small amounts of radioactivity (radiation) is dangerous and can induce mass die-offs; therefore, the concept of HORMESIS MUST - logically - BE A FALLACY and the EXISTING Linear No-Threshold (LNT) Model MUST EITHER NOT BE CHANGED OR REVISED MORE STRINGENT.