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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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Submitter Information

Name: Lonnie Clark

Address:

P.O. Box 1495

Eugene, OR, 97440

Email: nutzforart@gmail.com

General Comment

We urge the Nuclear Regulatory Commission to refrain from changing the way we measure radiation from the Linear No-Threshold Model to adopting the Hormesis theory.

It is untrue that hormesis has not been investigated by the nuclear industry. In fact, it was extensively studied by the early scientists of the nuclear industry. The directive in the early years of the nuclear industry was to search for a means to show that radiation could somehow help humanity in some way. The nuclear proponents spent many years in the beginning of this industry twisting like a pretzel in an effort to show that nuclear was at best helpful, and at the least, not harmful to humanity, to no avail. The result caused the AEC to embrace the Linear No-Threshold Model in the first place.

To quote from an article an older article of the Bulletin of the Atomic Scientists, page 58.3 (2002) by LeRoy Moore, that discusses even more stringent rules apply to this argument as well:

"The current debate about low-dose exposure, sparked by self-interested nuclear professionals, pits advocates of a threshold against adherents of the linear no-threshold orthodoxy. But the evidence for supralinear effects seems to suggest that the debate that needs to occur is between disciples of the linear orthodoxy and advocates of the more cautious supralinear model. The guiding principle for this debate needs to be that radiation exposure standards exist to protect not the industry but the public.

Decisions should be made in the company of those who have been or will be impacted--miners, production and testing workers, nearby residents, downwinders, people with a stake in their own survival and, finally, those who understand that future generations depend for their security on the decisions made today.

Organizations like the ICRP, NCRP, and UNSCEAR should at an early date bring into their decision-making structure representatives of affected populations. These groups should work together to develop a plan on how to involve the affected publics directly in the task of proposing and adopting standards for permissible exposure. More democracy will mean less damage all across the board. "

This article was written after many of the studies proved that hormesis in regards to radiation exposure for the masses of humanity (and other living organisms) to be 100% unsupportable by scientific research.

Granted, Fukushima has driven us off "Niagara Falls in a barrel" in regards to radiation exposure.

We ought to be demanding the nuclear industry start pouring money into findings methods to mitigate the negative effects of radiation on humans and life on our planet, instead of its current commitment to manipulating facts to convince Americans that radiation poses no threat when in fact it is harmful at every level (with limited medical use).

Radiation can be used for sound medical purposes, however, to refuse to measure the radiation levels in an honest manner is inhumane.

The Nuclear Regulatory Commission must have the courage to face the responsibility of measuring the levels of radiation caused by nuclear reactors at levels that none of us ever imagined could happen.

It is the hard responsibility of the NRC to measure radiation. It also has a responsibility to demand that the nuclear industry begin to study how to mitigate the harm caused by radiation through methods as yet measured (for example, sound healing, which can move molecules). Helping Americans face this reality is also the responsibility of the NRC.

I urge the NRC to maintain measuring radiation through with the Linear No-Threshold Model, and resist the urging the nuclear technologists to change to a Hormesis basis. These "scientists" have refused to honestly apply scientific methods to the study of nuclear pollution. Dr. John Gofman called them "data diddlers" for good cause. Their claim that hormesis has "never been studied" is clearly not true. Hormesis in regards to radiation has been proven to be untrue.

Changing to the Hormesis threshold will undermine one of the basic principle of the NRC, to protect the American people. It takes courage to face the Age of Fission we are forced to live in since Fukushima.

We can learn to thrive in the Age of Fission, when we have honest scientists who look for answers instead of data diddlers who will lie to maintain profits and prevent "panic". I contend the "panic" that is so feared is caused by their lies and misinformation, not the hard truth of our reality.

Humans can thrive in the new Age of Fission, only if we face the truth and fortify our people with

information on nutritional methods to stave off the negative effects of radiation and force the nuclear industry to search for answers instead of continuing their long standing history of denying radiation causes no harm & under reporting the negative effects by 90%.

Thank you in advance for your courage to maintain the Linear No-Threshold Model.