

As of: 8/20/15 3:01 PM
Received: August 20, 2015
Status: Pending_Post
Tracking No. 1jz-8kng-2ju1
Comments Due: September 08, 2015
Submission Type: Web

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-0148

Comment on FR Doc # 2015-15441

Submitter Information

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General Comment

I, personally, never knew about the LNT hypothesis or ALARA. I've become somewhat radiophobic due to the devastation of the Pacific, deaths and illnesses of loved ones, friends and acquaintances (without doubt caused by the on-going fallout from Fukushima Daiichi***, WIPP and other nuclear processes, events, incidents and accident) silence, lies, propoganda or otherwise craftiness with the data and message, the on-going increase in background radiation levels and concerns with air, water, and food quality***, lack of conscience/good judgment/great design, delays with (Hanford comes to mind) commitments, and the hubris of the Medical and Radiological Sciences communities [knowing full well a negative reinforcing loop is at work (simply stated: radiation-induced stressors overburdening and diminishing the immune system*** {yielding pH, flora, homeostatic and/or other imbalances} causing disease*** treated with radiation/restart!) and making lots of money on those unaware] then petitioning for revision to rules/laws/codes; it's just astounding.

That said, it is simply not practical to completely remove ALARA from the regulations due to all the many documents (and, no doubt, more than noted here) used by:

The NRC - which has about 40,700 results for the acronym "ALARA"

<http://www.nrc.gov/site-help/search.html?q=As+Low+as+Reasonably+Achievable+%28ALARA%29&site=allSites#gsc.tab=0&gsc.q=ALARA&gsc.sort=>

The EPA - which has 402 hits for the acronym "ALARA"

[http://nlquery.epa.gov/epasearch/epasearch?](http://nlquery.epa.gov/epasearch/epasearch?querytext=ALARA&x=9&y=8&fld=&areaname=&typeofsearch=epa&areacontacts=http%3A%2F%2Fwww.epa.gov%2Fepahome%2Fcomments.htm&areasearchurl=)

[querytext=ALARA&x=9&y=8&fld=&areaname=&typeofsearch=epa&areacontacts=http%3A%2F%2Fwww.epa.gov%2Fepahome%2Fcomments.htm&areasearchurl=](http://nlquery.epa.gov/epasearch/epasearch?querytext=ALARA&x=9&y=8&fld=&areaname=&typeofsearch=epa&areacontacts=http%3A%2F%2Fwww.epa.gov%2Fepahome%2Fcomments.htm&areasearchurl=)

The FDA - with about 58 hits for "As Low as Reasonably Achievable (ALARA)"

[http://google2.fda.gov/search?](http://google2.fda.gov/search?q=As%20Low%20as%20Reasonably%20Achievable%20%28ALARA%29&client=FDAGov&proxystylesheet=FDAGov&output=xml_no_dtd&site=FDAGov&requirearchive:Yes&sort=date:D:L:d1&filter=)

[q=As%20Low%20as%20Reasonably%20Achievable%20%28ALARA%29&client=FDAGov&proxystylesheet=FDAGov&output=xml_no_dtd&site=FDAGov&requirearchive:Yes&sort=date:D:L:d1&filter=1](http://google2.fda.gov/search?q=As%20Low%20as%20Reasonably%20Achievable%20%28ALARA%29&client=FDAGov&proxystylesheet=FDAGov&output=xml_no_dtd&site=FDAGov&requirearchive:Yes&sort=date:D:L:d1&filter=)

*** Furthermore, the following excerpt (primarily sea and fresh water foods) involving US Food and Drug Administration Alerts is antiquated but it serves the purpose for PROVING we have a major problem with the food chain. The list is used by the FDA for detention of products and, at review, appears to primarily impact firms from around the Pacific Rim.

http://www.accessdata.fda.gov/cms_ia/iapublishdate.html

Alert (Re)Published Import Alert Name

99-33 7/28/2015 Products from...[you'll have to review it and I HIGHLY RECOMMEND YOU DO!]

16-74 7/24/2015 Uneviscerated Fish Or Partially Eviscerated Fish that are Either Salt-Cured, Dried, Smoked, Pickled, Fermented or Brined *** (i.e., excluding LACF and Acidified Products Filed Under 21 CFR 108/113 or 114)***

16-04 7/21/2015 Misbranded Seafood

16-119 7/21/2015 Fish And Fishery Products For Importer And Foreign Processor (Manuf) Combinations

16-105 7/17/2015 Seafood and Seafood Products from Specific Manufacturers/Shippers Due to Decomposition and/or Histamines

16-05 7/14/2015 Mahimahi Because of Histamine and Decomposition

16-125 7/8/2015 Refrigerated (Not Frozen) Raw Fish and Fishery Products that are Vacuum Packaged or Modified Atmosphere Packaged or Packaged in a Material that is not Oxygen-Permeable Due to the Potential for Clostridium Botulinum Toxin Production

16-39 7/2/2015 Processed Seafood and Analogue Seafood (Surimi) Products for Listeria Monocytogenes

16-129 6/25/2015 Seafood Products Due to Nitrofurans

16-18 6/5/2015 Shrimp

16-50 12/19/2013 Molluscan ShellFish

16-25 1/19/2012 Canned Crabmeat from Thailand

16-47 10/7/2011 Red Snapper from Thailand

16-09 10/6/2011 Frozen KingFish From Tri-Tee Seafood Company

16-13 10/6/2011 Anchovy or Bagoong Products from the Philippines

16-118 3/18/2011 Salted JellyFish And Dried Squid From Hang Loong Marine Products, Hong Kong

16-17 3/18/2011 Salmonella in Frozen Whole Fish from Thailand

16-95 3/18/2011 Canned Tuna Due to Decomposition

And many more!

As well, A CITIZEN PETITION was proposed to the FDA in 2013 entitled "Request to Promulgate a Series of Regulations to Protect U.S. Consumers From...Contamination" stating:

"Various products in the U.S. food supply have...contamination: these include pistachios, oranges..., grapefruits..., prunes..., and almonds..."

It also notes "...samples of topsoil, water, milk, vegetables and berries..."

For more specifics you'll have to review the documentation:

<http://www.regulations.gov#!docketDetail;D=FDA-2013-P-0291>

Again, we can not remove ALARA from the regulations; however, YES we can and should reduce costs by employing Oxidation Therapies - "oxygen" is referred to in the petition:
<http://radiationeffects.org/2015/03/11/petition-for-rulemaking-regarding-10-cfr-part-20-standards-for-protection-against-radiation-based-on-new-science-and-evidence-that-contradicts-the-linear-no-threshold-lnt-hypothesis/>