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Submitter Information

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General Comment

Docket ID NRC-2014-0044: Appendix I of part 50 of Title 10 of the Code of Federal Regulations

Due to the critically in-depth nature of this proposed rule change, addressing the impacts of the proposed rule requires legal attention to the numerous documentation pathways the proposal affects, or is affected by. Such as ICRP's Publication 103 2007. With such extensive reach into associated legal offshoots, in-depth external review, an audit, perhaps, ought ensue to determine if, in fact, all relevant laws have been addressed, such as OSHA and other employment related medical and legal interests. (GAO, POGO, et al.) Especially with regards to attaching this rule change to possible updates to ICRP's Publication 103. Considering the circular nature of radiation policy (IAEA-WHO-NRC-IAEA) and historic conflicting medical and scientific opinions, and with Fukushima in the backdrop, the timing of this proposal appears self serving. The nuclear industry is faced with mounting costs due to liability and historic record of significant failure. Changing safety standards for workers, ultimately favoring corporations, contributes further negative impacts in the workplace. Risk aversion is not approached and ought be. Changing safety standards does not address the real issue at hand - nuclear radiation is dangerous and nuclear power does not effectively maintain secure conditions 24/7.

RELATED Documents ** ALARA; 10 CFR part 20; ICRP Publication 103 (2007) update?; SECY-08-0197, ML091310193, SECY-12-0064; ML121020108, ML090920103; 74 FR 32198, July 7, 2009; 75 FR 59160, September 27, 2010; and 76 FR 53847, August 30, 2011; 79 FR 43284; Docket RM-50-2, "Concluding Statement of Position of the Regulatory Staff, Guides on Design Objectives for Light-Water-Cooled Nuclear Power Reactors" (February 20, 1974, pp. 25-30); "Processes for Revision of 10 CFR part 20 Regarding Adoption of ICRP Recommendations on Occupational Dose Limits and Dosimetric Models and Parameters," dated August 2, 2001 (ADAMS Accession No. ML011580363); SECY-08-0197; NUREG/CR-4013, "LADTAP II-

Technical Reference and Users Guide," and NUREG/CR-4653, "GASPAR II-Technical Reference and Users Guide"; RG 1.110, "Cost-Benefit Analysis for Radwaste Systems for Light-Water-Cooled Nuclear Power Reactors"; several NUREGS that support RG 1.109 and 10 CFR part 50, appendix I. For example, NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors," NUREG-1302, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Boiling Water Reactors," NUREG-0543, "Methods for Demonstrating LWR Compliance With the EPA Uranium Fuel Cycle Standard (40 CFR part 190)," and NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants: A Guidance Manual for Users of Standard Technical Specifications"; RG 4.15, "Quality Assurance for Radiological Monitoring Programs (Inception through Normal Operations to License Termination)Effluent Streams and the Environment, Rev. 2"... source: <http://www.regulations.gov/#!documentDetail;D=NRC-2014-0044-0002> ... this list may not be complete.

Sincerely,

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