

## RulemakingComments Resource

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**From:** Donald Mosier <dmosier@scripps.edu>  
**Sent:** Thursday, September 03, 2015 3:16 PM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] NRC-2015-0057  
**Attachments:** 090315 LETTER TO THE NRC.pdf

Secretary, NRC, Rulemaking and Adjudications Staff,

Please enter my attached letter regarding Docket ID NRC-2015-0057 into the public record.

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September 3, 2015

Re: NRC-2015-0057

Three radiation biologists, including Dr. Carol S. Marcus affiliated with the UCLA David Geffen School of Medicine, have submitted a dangerous petition to the NRC that would change the way radiation exposure is regulated. The current rules begin with the premise that any radiation exposure is potentially harmful, and that exposure should be limited to doses as low as reasonably possible. The petition submitted by Dr. Marcus and others argues a contrarian view that low radiation doses may be beneficial and that higher thresholds for exposure should be set. There is no scientific consensus that this theory applies to humans, and certainly more research is needed to settle the issue. The hypothesis that low dose irradiation induces a DNA repair response that protects against later exposure is refuted by evidence in mice<sup>1</sup>, a surrogate model for human exposure. It should be noted that many of the publications supporting the beneficial effects of irradiation appear in the online journal "Dose Response" published by the International Hormesis Society, an advocacy group promoting this viewpoint.

Moreover, the policy implications of setting higher exposure thresholds are even more troubling given that anyone living within 50 miles of the San Onofre Nuclear Generating Station will be subject to potential exposure from the 4000 tons of highly radioactive spent fuel rods to be stored there for the foreseeable future. Is it really wise to relax exposure standards based on an unproven theory when there are potential health risks for 8 million individuals?

<sup>1</sup>Blimke, MS et al., *Radiat Res* 181:548-59, 2014.

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