

RulemakingForm3CEm Resource

From: susan michetti [sunlightrising@gmail.com]
Sent: Wednesday, August 19, 2015 4:35 PM
To: RulemakingComments Resource
Subject: [External_Sender] Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

Dear Secretary,

The NRC should reject the three petitions for rulemaking cited in the subject line out of hand. The agency should not even have accepted them for public comment in the first place, as they are frivolous and based on unsound science.

These three petitions seek to drastically weaken radiation protection standards and change the NRC's regulations from the Linear No-Threshold (LNT) model endorsed by the National Academies of Sciences to a "hormesis" model accepted by no one but a few pro-nuclear power fanatics. Indeed, the hormesis model, rather than recognizing that any dose of radiation exposure may be harmful and should be avoided if possible, turns that scientifically-documented premise on its head and argues that low doses of radiation exposure may actually be beneficial. There is no solid evidence of any kind that that is the case.

As Harvard's Richard R. Monson, chair of the National Academies of Science (NAS)'s BEIR VII committee stated in 2006, "The scientific research base shows that there is no threshold of exposure below which low levels of ionizing radiation can be demonstrated to be harmless or beneficial." This conclusion came from the latest study that NRC and other federal agencies commissioned NAS to carry out to update radiation risk information, so NRC should not be considering radical proposals that contradict its own update.

Throughout the medical textbooks based on peer reviewed scientific studies, it is acknowledged that any exposure to ionizing radiation causes damage to the membranes of cells. While some people heal and recover from this in small doses without any repetitive dosages, many people do not heal and do not recover, particularly the elderly and sick and those with compromised immune systems. It is unacceptable to expose people to ionizing radiation unless it is medically necessary, meaning the advantages must outweigh the disadvantages on a case by case basis.

Further, it is the US Environmental Protection Agency (EPA) that is charged with setting radiation protection of the public overall and its most recent update of the Blue Book (EPA 402-R-11-001, 2011), like the NRC's current standards (which are themselves too weak), continue to be based on the LNT model. Adoption by the NRC of the "hormesis" model would put the agency in direct and unnecessary conflict with the EPA on this critical underpinning of public health and safety regulation. It is irrational for an agency that once claimed to be based on science is showing that it is anti-science, meaning that the NRC no longer has the qualifications to continue operating the atoms for peace programs, to continue regulating nuclear plants, and that they should all be shut down immediately because the regulatory agency has been captured and is in the hands of falsifiers of truth and are proclaiming anti-science stands, which are the opposite of what is expected from the NRC.

As the chief of EPA's radiation section said in 2009, "Although recent radiobiological findings indicate novel damage and repair processes at low doses, LNT is supported by data from both epidemiology and radiobiology. Given the current state of the science, the consensus positions of key scientific and governmental bodies, as well as the conservatism and calculational convenience of the LNT assumption, it is unlikely that EPA will modify this approach in the near future".

If anything, the NRC should move in the opposite direction, as significant research indicates that long-term exposure to low levels of radiation may carry a greater risk of harm than the LNT model presents. It is also well established that radiation causes other kinds of health damage in addition to cancer, but the regulations and risk studies ignore these, and thus are inadequate in that sense. The cumulative data show that persons living near low levels of radiation from nuclear power reactors suffer from increased leukemia, exactly what one might suspect from membrane damage to blood cells, as well as increased still born deaths and other adverse health effects. The LNT model needs to incorporate this data and decrease exposure and risks to the public.

The petitioners have done the nation a disservice by attempting to weaken these standards using a scientifically suspect model, and thus directing attention away from the real need to strengthen those standards, in particular to account for the reality that radiation is more harmful to children, especially girls, and to women than it is to men, and that the "standard man" approach used by the NRC allows for even greater exposure levels to those who are more vulnerable.

Any changes to radiation regulations contemplated by the NRC should be in the direction of strengthening, not weakening them. If NRC continues to show itself incompetent in terms of evaluating and applying science data, then it is not competent to continue to be the lead regulator of nuclear power plants, as obviously it has been captured to work against the majority of the interests of the people.

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