

## RulemakingForm3CEm Resource

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**From:** Ned Flaherty [ned\_flaherty@msn.com]  
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Dear Secretary,

The NRC should reject these 3 rulemaking petitions.

They are frivolous, un-scientific, and violate public policy.

They would 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 only a few pro-nuclear power fanatics.

The hormesis model ignores the harm of radiation, and argues that low doses are beneficial. There is zero evidence for this.

NRC's own update proved that there is no safe or beneficial exposure threshold, so NRC should not consider any radical proposals that contradict its own update.

EPA sets public radiation protection, 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. The "hormesis" model would put NRC in direct and unnecessary conflict with EPA on public health and safety.

EPA's radiation section chief said, "Although recent radiobiological findings indicate novel damage and repair processes at low doses," LNT is supported by data from both epidemiology and radiobiology, and EPA is unlikely to modify it in the near future.

NRC should move in the opposite direction, because significant research shows that long-term exposure to low levels of radiation may carry a greater risk of harm than the LNT model presents. Radiation also causes other kinds of health damage, which the regulations and risk studies ignore.

The petitioners hope to weaken these standards using a scientifically suspect model, and so are ignoring the real need to: (1) strengthen those standards, (2) recognize that radiation is more harmful to children (especially girls) and to women than it is to men, and (3) recognize that NRC's "standard man" approach allows for even greater exposure levels to those who are more vulnerable.

Any changes to NRC radiation regulations should strengthen, not weaken.

Ned Flaherty  
75 Clarendon Street, #508  
Boston, MA 02116  
US

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