

RulemakingForm3CEm Resource

From: Jean Lindgren [lindgren.b8@gmail.com]
Sent: Thursday, August 20, 2015 12:43 AM
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.

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.

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.

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".

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.

Any changes to radiation regulations contemplated by the NRC should be in the direction of strengthening, not weakening them.

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