

## **Rulemaking1CEm Resource**

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**From:** RulemakingComments Resource  
**Sent:** Friday, September 25, 2015 2:12 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30  
**Attachments:** NRC-2015-0057-DRAFT-0265.pdf

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**SECY-067**

**PR#:** PRM-20-28, PRM-20-29, and PR-20-30

**FRN#:** 80FR35870

**NRC DOCKET#:** NRC-2015-0057

**SECY DOCKET DATE:**

**TITLE:** Linear No-Threshold Model and Standards for Protection Against Radiation

**COMMENT#:** 273

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
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**Subject:** Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30  
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# PUBLIC SUBMISSION

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**Docket:** NRC-2015-0057

Linear No-Threshold Model and Standards for Protection Against Radiation

**Comment On:** NRC-2015-0057-0086

Linear No-Threshold Model and Standards for Protection Against Radiation; Extension of Comment Period

**Document:** NRC-2015-0057-DRAFT-0265

Comment on FR Doc # 2015-20722

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## Submitter Information

**Name:** Steve Brown

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## General Comment

See attached file(s)

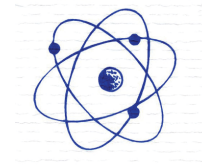
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## Attachments

Addendum LNT Petition Comments\_SHB\_5SEPT2015

***SHB INC., 7505 S. XANTHIA PLACE, CENTENNIAL, COLORADO 80112***

**Steven H Brown, Certified Health Physicist**  
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**September 5, 2015**

**Subject: Addendum to Comments Regarding Petition for Rulemaking; Linear No-Threshold Model and Standards for Protection Against Radiation; Docket ID NRC-2015-0057**

**Attention: Solomon Sahle, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission**

Mr. Sahle:

In my comments of September 4, I alluded to the different annual exposure limits for radiation workers vs. members of the public (e.g., discussion # 3 on the concept of “collective dose”), but did not address specifically the petitioners’ recommendation that public and worker exposure limits should be identical. I do not agree with this recommendation.

Historically, the justification to allow greater annual exposure limits for workers under the US Atomic Energy Act of 1954 (had been a factor of ten for many decades; i.e. 5000 mrem vs. 500 mrem) was, I believe based on:

- (1) Workers are receiving an identifiable benefit associated with the radiation exposure, i.e., employment and associated benefits (health e.g.). Regarding members of the public, the benefit is often not quite as clear, particularly regarding whether the individuals who receive the exposure are also those receiving the benefits.
- (2) Workers, to be “radiation workers” and therefore subject to occupational exposure limits, must receive varying degrees of radiation safety training, commensurate with specifics of their jobs and associated risks. At a minimum, instructions and notifications in accordance with 10 CFR 19 or Agreement State equivalents are required to be provided and documented.
- (3) Exposure of workers must be monitored per the requirements of 10 CFR 20.1501.

Accordingly, I believe it appropriate to continue to have different annual exposure limits for properly trained and monitored radiation workers vs. members of the public. However, whether current limits are or are not appropriate in the context of the LNT debate is a different question.

Thank you again – Steve Brown, CHP

Sten H. B.