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General Comment

I am writing in strong support of the petition to eliminate the use of the LNT model as a basis for NRC's formulation of standards in the workplace for protection against radiation.

The published evidence against the LNT model, and conversely in favor of hormesis in the low-dose range is now overwhelming and undeniable. Therefore, enormous costs are being incurred throughout the medical field in the ongoing development of imaging technology as well as to monitor and document compliance with such regulations that are not only unnecessary and expensive but likely detrimental to patients and to our hospital staff.

There is now enormous regulatory oversight pressuring health care professionals to further reduce radiation doses received by patients for CT scans and other Nuclear Medicine procedures. For example, the preponderance of justification driving the PET-MRI imaging initiative to compete with PET-CT for staging and monitoring patients with cancer is related to the lower dose of ionizing radiation associated with the former. However, the strong consensus from the literature, as summarized in Dr. Marcus' petition, is that such doses of radiation received by patients undergoing PET-CT scans within a reasonable frequency of diagnostic assessment are NOT contributing to increased risks of downstream carcinogenesis, and in fact may further be

beneficial in reducing such risks among those patients who survive long enough. Considering that PET-MRI imaging technology costs 4-5 times as much as PET-CT, one can appreciate that there are huge economic implications driven by the LNT model fueling the justification for ongoing promotion of this expensive alternative to our existing PET-CT imaging technology.

Other aspects of over-vigilant monitoring and documentation of occupational exposures are exemplified by the existing requirement to notify in writing all workers who receive >100 mrem annually. In light of the evidence presented, what point does this serve?

The science is clear. The LNT model does NOT apply in the low dose range. It is time that we accept this large body of evidence in support of the hormetic model, and it is time for the NRC to modify its standards for protection against radiation accordingly.

Thank you for your consideration.