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General Comment

1. A concept that to my surprise is often confused when discussing the LNT model regards the physical vs the biological threshold of radiation effects. What I believe is at issue are the health consequences of radiation induced DNA breaks at low dose (<1Gy); that is, whether they can be repaired and whether they will actually result in cancer (in contrast to the relationship between number of ionizing radiations striking a cell and the resulting DNA breaks which is likely linear). Consider clarifying this point during the hearings.

2. The LTN and "radiation limits" debate needs to be resolved with some urgency: One trend that needs to be brought up is the ever increasing number of publications that appeal to LNT-based logic as the primary justification to replacing CT and Nuclear Medicine studies with more costly, and not necessarily more adequate, imaging modalities. MRI, in particular, is not risk free. The effects of Gd contrast media have been amply documented.

I am an engineer and work in PET and CT imaging and the above comments reflect my opinion and not necessarily those of my employer.