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Linear No-Threshold Model and Standards for Protection Against Radiation

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

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Comment on FR Doc # 2015-20722

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General Comment

The U.S. Nuclear Regulatory Commission proposal to replace the "Linear No-Threshold" (LNT) basis of radiation protection that the U.S. has used for decades and replace it with the "radiation hormesis" theory represents a gross negligence of scientific knowledge, an unexcusable socialization of nuclear power-plant operators' errors and an appalling dereliction of regulatory duty.

Although such a change may simply legalize what the government is already not doing failing to protect the public and promoting nuclear radiation, such a betrayal of public policy will not be hidden from the public.

LNT embodies the vast body of scientific studies showing that radioactivity causes health damage in particular cancer directly proportional to dose, and that there is no "threshold." Moreover, because the effects of radiation are cumulative, the sum of several small exposures are considered to have the same effect as one larger exposure, something called "response linearity." LNT has been repeatedly endorsed by scientific advisory bodies, including the U.S. National Academy of Sciences, the International Commission on Radiological Protection, the United Nations Scientific Committee on the Effects of Ionizing Radiation, and the National Council on Radiation Protection and Measurements, with additional input from its own independent review.

There is no convincing evidence that LNT greatly overestimates risk at the low doses of interest as determined by the National Academies of Sciences' BEIR VII committee. BEIR VII found that "the balance of evidence from epidemiologic, animal and mechanistic studies tend to favor a simple proportionate relationship at low doses between radiation dose and cancer risk."

As chair of the BEIR VII committee, Dr. Richard Monson, associate dean of the Harvard School of Public

Health, said in 2005 on issuance of its report: "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."

The NRC must maintain the current U.S. requirement that nuclear plant operators reduce exposures to the public to "as low as reasonably achievable." Emergency planning zones must be maintained and the NRC must force the industry to spend money to limit radiation releases.