

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, September 28, 2015 9:41 AM
To: Rulemaking1CEm Resource
Subject: Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30
Attachments: NRC-2015-0057-DRAFT-0302.pdf

DOCKETED BY USNRC—OFFICE OF THE SECRETARY

SECY-067

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

FRN#: 80FR35870

NRC DOCKET#: NRC-2015-0057

SECY DOCKET DATE: 9/8/15

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

COMMENT#: 309

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 1097

Mail Envelope Properties (cb41956e2c534c998c6452cfecbaeb66)

Subject: Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30
Sent Date: 9/28/2015 9:40:42 AM
Received Date: 9/28/2015 9:40:43 AM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:
"Rulemaking1CEm Resource" <Rulemaking1CEm.Resource@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS03.nrc.gov

Files	Size	Date & Time
MESSAGE	296	9/28/2015 9:40:43 AM
NRC-2015-0057-DRAFT-0302.pdf		69999

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

PUBLIC SUBMISSION

As of: 9/24/15 4:05 PM Received: September 08, 2015 Status: Pending_Post Tracking No. 1jz-810r-8kc1 Comments Due: September 08, 2015 Submission Type: Web
--

Docket: NRC-2015-0057

Linear No-Threshold Model and Standards for Protection Against Radiation

Comment On: NRC-2015-0057-0010

Linear No-Threshold Model and Standards for Protection Against Radiation; Notice of Docketing and Request for Comment

Document: NRC-2015-0057-DRAFT-0302

Comment on FR Doc # 2015-15441

Submitter Information

Name: Erica Gray

Address:

406 Glendale Dr.
Henrico, VA, 23229

Email: veggielady@yahoo.com

General Comment

Deny the petitioners request to change the LNT Model to Hormesis Model.

The hormesis concept merits empirical evaluation and refinement independently of whether it is assimilated into policy on toxic substances.

It would be premature to regulate to the hormetic zone for chemical exposures now. How hormesis figures into policy needs to be revisited as risk assessment improves.

Using hormesis for regulatory purposes would require better understanding of the positions of the toxic and hormetic zones for diverse endpoints, tissues, individuals, and species.

Biphasic dose responses raise challenging ethical questions regarding sensitive subpopulations.

Ecological effects of low doses and differences among species with respect to hormesis warrant continued investigation.

I am very disturbed to see the NRC is ceasing work on a National Academy of Sciences (NAS) pilot study (Phase 1 and

Phase 2) of cancer risks in populations near U.S. nuclear power facilities. The NRC determined that continuing the work was impractical, given the significant amount of time and resources needed and the agency's current budget constraints.

<http://www.nrc.gov/reading-rm/doc-collections/news/2015/15-055.pdf>

The NRC could demand the industry pay for these studies. If the NRC is not willing to do the studies, then there is no way they can come to scientific conclusions.

Let's remember here that the fetuses, babies, children and women are more sensitive to radiation.

We have the right not to be harmed or injured unless we freely and knowingly choose to risk such injuries.