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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

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General Comment

The move to replace the LNT with a hormesis model should not be considered at all. There are no phase 1 or 2 trials to demonstrate this theory. Trials are commonly used in order to assess the feasibility of a proposed drug or other device and this is not the case nor will it ever because we would need willing individuals to be exposed to low level ionizing radiation.

It is the duty of the governing bodies to protect the public from harm no matter the source. There is no "safe" level of radiation exposure. One cannot predict the incidence of leukemia or thyroid cancer based on bomb explosions or nuclear reactor events. Extrapolation using this data is by convenience and is not a proper scientific tool. One can only retrospectively observe those events and make predictions based on them. No one would choose to risk themselves based on this information and to adopt a theory that raises the allowable levels of exposure beyond what they are is just wrong. The standards should either be maintained at minimum or even decreased. At the end of the day, if a person were given a fatal diagnosis attributed to low level exposure having been told their chances of getting the disease were 1 in 100,000, they would only consider their chances of survival at that point. I am an authorized medical physicist working in an environment where treatment of cancer is the emphasis. Let's not make the mistake of minimizing the effects of ionizing radiation.