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Docket: NRC-2014-0044
Reactor Effluents

Comment On: NRC-2014-0044-0003
Reactor Effluents; Extension of Comment Period

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Comment on FR Doc # 2015-21072

Submitter Information

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General Comment

This comment deadline should be extended. After the NRC has failed to come into line with the ICRP for decades, to decide that it must be updated before new ICRP dose coefficients are published is suspicious and wrong. The timing contradicts the point of the comment period. How to come into line with the ICRP when information is still outstanding? Even your staff objects and says to wait. There should be no public comment prior to the publication of new ICRP dose coefficients. And, ICRP dose coefficients must be made available for free to the American public. You should be using US government funded BEIR for cancer risk, especially since it is more protective than ICRP and available for free (at taxpayer expense).

And, why is this comment period being held while increasing the value of life is under discussion at the NRC? Increasing value of life to DOT standards of \$9.4 million is \$9,400 per person rem or \$940 per mSv (using BEIR's risk model of 100% cancers per 10,000 mSv). Furthermore, you need to clarify how this is applied. Is it multiplied by population in the 50 mile radius? Where is impact on animals and agricultural land? Value of human life determines how much radiation must be filtered from effluents. Low value of human life means little filtration. High value means more filtration. Thus it is relevant. The \$1,000 given per man (person) rem (\$100 per mSv) calculates to \$1 million per extra cancer prevented (following BEIR where there are an estimated excess 1% cancers per 100 mSv and 100% per 10,000 mSv and the model which the NRC apparently uses to calculate),

The nuclear industry must not be allowed to continue to externalize medical and other social costs upon everyone else. It is the cost of doing business. If they cannot pay the full cost, then shut them down. You've enough to keep you busy for perpetuity with the nuclear waste, if only you would do your jobs!

Failing to hold the nuclear industry accountable for cancers and other illnesses induced by radioactive

effluents externalizes the true cost upon insurance companies (resulting in higher premiums), and the taxpayer, when insurance no longer pays (and for the elderly and uninsured), and upon volunteer caregivers. The nuclear utilities keep the profits (benefits) for themselves. They externalize the financial and social costs (risks) upon others.

Concentration "limits" are NOT an acceptable measure of radiation in air and water "effluents". There needs to be a legally binding fixed amount of radioactive emissions to the environment by nuclear reactors (and other parts of the nuclear fuel chain) - preferably zero. If that is too costly then the reactors must be shut-down.

The rules must be clear, for fixed amounts, and across the board. An amount in becquerels with no description of radiation type and impacts is unacceptable. There must be no grandfathering in of old reactors. The limits must be true limits for all aspects of the nuclear fuel chain.

Where is the value for plants, animals, agricultural land?

Effluents should NOT be in mGy but in mSv (or mrem), especially for internal exposures. Biological impact must be given in mSv (or mrem). Gray-mGy is for transient external radiation, mostly x-rays. Gray describes energy on matter and not on living beings.

Fatalities can be as far away as 60 miles and impacts a thousand or more miles away. This must be taken into account.