

## **Rulemaking1CEm Resource**

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**Sent:** Monday, October 19, 2015 10:31 AM  
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**Subject:** Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30  
**Attachments:** NRC-2015-0057-DRAFT-0405.pdf

### **DOCKETED BY USNRC—OFFICE OF THE SECRETARY**

**SECY-067**

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**FRN#:** 80FR35870

**NRC DOCKET#:** NRC-2015-0057

**SECY DOCKET DATE:** 10/6/15

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

**COMMENT#:** 413

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
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**Docket:** NRC-2015-0057

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

**Document:** NRC-2015-0057-DRAFT-0405

Comment on FR Doc # 2015-20722

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## Submitter Information

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## General Comment

The use of the hormesis model for radiation protection is irresponsible. The basic premise of safety/risk management is that we reduce risk when we are able. We should assume that the deleterious effects of radiation follow a liner model unless it is proven to be wrong. The liner no threshold model has not been proven to be wrong at this time.