

## **Rulemaking1CEm Resource**

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**Sent:** Monday, October 19, 2015 10:34 AM  
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**Subject:** Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30  
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**TITLE:** Linear No-Threshold Model and Standards for Protection Against Radiation

**COMMENT#:** 416

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# PUBLIC SUBMISSION

**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-0423

Comment on FR Doc # 2015-20722

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## General Comment

The role of the regulator is to protect the public health and safety. The role of the scientific community is to debate and test various models of physical reality.

The endorsement by the NRC of a scientific model which predicts results so small they can not be verified with any statistical significance has caused a great deal of confusion. This simplification of the regulator's task by adopting and tacitly endorsing an unverifiable model is counterbalanced by several detriments to society.

Detriments include

- Misallocation of societal resources to address doses that do not pose a verified risk.
- Detriment to the public health by mandating incurrence of real verifiable risks to avoid unverifiable risks that may not even exist.
- The creation of a terrorist weapon of area denial, by convincing people that tiny amounts of radioactive material justify extreme overreactions and concerns.
- Distortion of actual costs of nuclear technologies like power production, medical isotope production, food irradiation facilities, etc., to the detriment of the public health and welfare.

NRC regulators should focus on protecting the public health, and should consult the scientific community and the best currently available scientific evidence in the course of that task. Regulators should not attempt to codify scientific truth, and they should not impose costs and harms on society to avoid imagined risks that are unsupported by evidence.

The NRC should discontinue advocating the LNT, and drop the ALARA concept that has become forever tainted by this confusion.

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