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From: Chris OMeara Dietrich <chris.omearadietrich@yahoo.com>
Sent: Thursday, August 20, 2015 8:56 PM
To: RulemakingComments Resource
Subject: [External_Sender] Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

Dear Secretary,

I feel strongly that the NRC should reject the three petitions for rulemaking cited in the subject.

Harvard's Richard R. Monson, chair of the National Academies of Science (NAS)'s BEIR VII committee stated in 2006, "The scientific research base shows that there is no threshold of exposure below which low levels of ionizing radiation can be demonstrated to be harmless or beneficial." This conclusion came from the latest study that NRC and other federal agencies commissioned NAS to carry out to update radiation risk information.

The hormesis model, which these proposals are based upon, rather than recognizing that any dose of radiation exposure may be harmful and should be avoided if possible as the latest NAS study concluded, denies that scientifically-documented premise and argues that low doses of radiation exposure may actually be beneficial. The only benefit I see here is to profits, people would be harmed.

The US Environmental Protection Agency (EPA) is charged with setting radiation protection of the public overall and its most recent update of the Blue Book (EPA 402-R-11-001, 2011), like the NRC's current standards (which are themselves too weak), continue to be based on the LNT model

Given the current state of the science, the consensus positions of key scientific and governmental bodies, as well as the conservatism and calculational convenience of the LNT assumption, it is unlikely that EPA will modify this approach in the near future". . . Adoption by the NRC of the "hormesis" model would put the NRC in direct and unnecessary conflict with the EPA on this critical underpinning of public health and safety regulation.

The petitioners have done the nation a disservice directing attention away from the real need to strengthen those standards, in particular to replace the "standard man" approach used by the NRC that allows for even greater exposure levels to those who are more vulnerable, with new standards for children, especially girls, and for women and for men instead of the generic "standard man. "

Any changes to radiation regulations contemplated by the NRC should be in the direction of strengthening, not weakening them and of bringing them up to date with current science.

Chris OMeara Dietrich
3358 Valley Forge Way
San Jose, CA 95117
US

Federal Register Notice: 80FR35870,NRC-2015-0057
Comment Number: 1694

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Subject: [External_Sender] Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30,
NRC-2015-0057
Sent Date: 8/20/2015 8:55:42 PM
Received Date: 8/20/2015 8:55:45 PM
From: Chris OMeara Dietrich

Created By: chris.omearadietrich@yahoo.com

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

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Files	Size	Date & Time
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