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From: RulemakingComments Resource
Sent: Tuesday, October 27, 2015 11:56 AM
To: Rulemaking1CEm Resource
Subject: Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30
Attachments: NRC-2015-0057-DRAFT-0403.pdf

DOCKETED BY USNRC—OFFICE OF THE SECRETARY

SECY-067

PR#: PRM-20-28, PRM-20-29, and PRM-20-30

FRN#: 80FR35870

NRC DOCKET#: NRC-2015-0057

SECY DOCKET DATE: 10/5/15

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

COMMENT#: 412

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 1217

Mail Envelope Properties (cf576f94c02d4106b5b78339b481d552)

Subject: Comment on NRC-2015-0057 - PRM-20-28, PRM-20-29 & PRM-20-30
Sent Date: 10/27/2015 11:56:12 AM
Received Date: 10/27/2015 11:56:13 AM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:
"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS02.nrc.gov

Files	Size	Date & Time
MESSAGE	297	10/27/2015 11:56:13 AM
NRC-2015-0057-DRAFT-0403.pdf		330524

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

PUBLIC SUBMISSION

As of: 10/9/15 2:33 PM
Received: October 05, 2015
Status: Pending_Post
Tracking No. 1jz-8lii-6y9k
Comments Due: November 19, 2015
Submission Type: Web

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-0403

Comment on FR Doc # 2015-20722

Submitter Information

Name: Nancy Beck

General Comment

Please see attached comments from the American Chemistry Council (ACC) on the NRC Consideration of Petitions to Amend its Standards for Protection Against Radiation

Attachments

ACC Comments to NRC on Petitions to Amend Radiation Standards Oct 5 2015



October 5, 2015

Annette L. Vietti-Cook
Secretary of the Commission
Nuclear Regulatory Commission
Washington DC 20555-001
Sent electronically to www.regulations.gov docket ID NRC-2015-0057

Re: ACC Comments on NRC Consideration of Petitions to Amend its Standards for Protection Against Radiation

Dear Ms. Vietti-Cook:

The American Chemistry Council (ACC)¹ appreciates the opportunity to provide comments as the Nuclear Regulatory Commission (NRC) considers three petitions for rulemaking requesting amendments to the NRC “Standards for Protection Against Radiation” regulation. As the business of chemistry today touches more than 96 percent of the products that we all use every day and accounts for thousands of new products and innovations, it is imperative that chemistry be used safely and responsibly. ACC and its member companies are committed to using sound scientific evidence to ensure the safe management of chemicals throughout their lifecycle.

Sound science and transparency must also be at the core of how the Federal Government evaluates risks. We are thus supportive of the NRC conducting a full evaluation of all the science to evaluate whether the linear no-threshold model is still the appropriate approach to low dose radiation protection. The three petitions that have been received provide significant new information, which along with other new scientific data², should be considered. Our biological, medical, and toxicological understanding of how chemicals and radiation cause cancer has greatly advanced since the NRC last significantly evaluated the scientific underpinnings of the

¹ The American Chemistry Council (ACC) represents the leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care®, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing. The business of chemistry is an \$801 billion enterprise and a key element of the nation's economy. It is the nation's largest exporter, accounting for fourteen percent of all U.S. exports. Chemistry companies are among the largest investors in research and development. Safety and security have always been primary concerns of ACC members, and they have intensified their efforts, working closely with government agencies to improve security and to defend against any threat to the nation's critical infrastructure.

² See for instance: Werner Olipitz, Dominika Wiktor-Brown, Joe Shuga, Bo Pang, Jose McFaline, Pallavi Lonkar, Aline Thomas, James T Mutamba, Joel S Greenberger, Leona D Samson, Peter C Dedon, Jacquelyn C Yanch, Bevin P Engelward, *Integrated Molecular Analysis Indicates Undetectable Change in DNA Damage in Mice after Continuous Irradiation at ~ 400-fold Natural Background Radiation*, *Environ Health Perspect.* 2012 August; 120(8): 1130–1136. Published online 2012 April 26. doi: 10.1289/ehp.1104294.



regulation. This improved understanding should be central to the reexamination of the scientific validity of the historical linear no threshold approach to radiation risk assessment.

The National Academy of Sciences (NAS) has recently published multiple reports on the conduct of transparent and objective scientific reviews. These “systematic reviews,” which focus on a specific question and use explicit, pre-specified scientific methods to identify, select, assess, and integrate the findings of similar but separate studies, have become the standard approach for evaluating clinical evidence.³ More recently, these tools have been recommended for use and are beginning to be used by the U.S. Environmental Protection Agency and the National Toxicology Program to evaluate chemical risks.⁴ We recommend that the NRC use a similar formalized systematic review approach to evaluate evidence to determine whether a linear no-threshold approach to radiation safety is still appropriate. How the NRC regulates low dose radiation risks has significant implications, not just for workers but also for the general public.

Thank you for the opportunity to provide these comments. We hope you will find them constructive and we would be happy to meet with NRC staff to discuss our recommendation. Please feel free to contact me either by phone (202-249-6417) or by email (nancy_beck@americanchemistry.com) with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Nancy Beck". The signature is written in a cursive style with a large initial "N".

Nancy B. Beck, PhD, DABT
Senior Director
Regulatory and Technical Affairs

³ Institute of Medicine (IOM): Finding what works in Health Care: Standards for Systematic Reviews. Washington, DC: The National Academies Press, 2011.

⁴ See for instance: National Research Council (NRC). Review of EPA's Integrated Risk Information System (IRIS) Process. Washington, DC: The National Academies Press, 2014; and <http://ntp.niehs.nih.gov/pubhealth/hat/noms/index-2.html>.