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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-0446

Comment on FR Doc # 2015-20722

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General Comment

Docket ID NRC 2015-0057 -

First, let me say thank you for extending the public comment deadline on alarming proposed rule: Linear No-Threshold Model and Standards for Protection Against Radiation, until November 19, 2015.

It seems incredible to me, how such vitally important regulations and how such a dangerous nuclear waste exposure limit increase like this is proposed, yet opportunities like this for Public Comment usually receive so little, or no exposure in mainstream media. If proposals like this got coverage on CBS "60 Minutes", or exposure in all forms of modern mainstream social media, instead of meeting minimum notice publication in Federal Register, I expect NRC would probably receive many more public comments, many of which would be meaningful and credible.

I sometimes hear comments during telephone conference meetings from NRC staff that in most cases, when proposed rule changes like this occur, that commonly very few, or no public comments are received. Or in cases where comments from public are received, when one views the subsequent Final Rulemaking, public comments are usually routinely dismissed, or were found not to contain substantive material which would cause NRC staff to require undertaking any extended analysis, or apply new limits, or mitigation measures which were never considered, or credible alternatives to a specific proposed NRC action, as if public comments never identify credible concerns, or contain sufficient merit to indicate NRC staff's analysis may have overlooked some technical aspect, or make a contribution to better understand disputed data sets where concrete answers may be years away in the future. It's often frustrating when stakeholders observe patterns

like that, when significance thresholds are applied in disparate ways, or there are noticeable inconsistencies over time, or analysts, or over regions occur, on how standards are applied. But it's a pattern that commonly happens, which I find disturbing ; While not specifically relevant to public comment on Docket ID 2015-0057, I think it's important for NRC to receive, and filter candid honest public feedback.

My primary public comment on this rulemaking proposal is extreme opposition. This week, I observed there has been recent new media exposure, and articles published in publications such as "Mining Awareness" about existence of new scientific evidence which proves that human exposures to even low doses of radiation over prolonged period are extremely harmful. I will need to post another subsequent public comment with the specific reference source, date, author to link to this comment, because It is not available at my disposal without losing this online link. I expect the substance in this article, that there is now sufficient medical evidence to disprove NRC's "hormesis model", will soon generate more media coverage as public awareness expands, and mainstream media catches up with the scientific community.

The 'take away' from this new scientific evidence is the indisputable and the extreme contrast from conclusions drawn from NRC's "Linear No-Threshold Model and Standards for Protection Against Radiation". My public comment here is therefore not just a frivolous assertion , but is a reflection of new scientific evidence which was not available earlier when NRC staff prepared the technical analysis under NRC 2015-0057. This evidence disproves NRC hormesis theory premises, which suggest that human exposure to low doses of radiation are not harmful to human health, and in fact may even be beneficial in some cases. To the contrary, I am extremely alarmed and disturbed that the unproven premise underlying NRC's proposed rule which would increase allowable human exposure to radiation levels from 0.25 millisieverts to 1.00 millisieverts (sp?) has come so very close to becoming a Final Rule, and a new accepted standard, which is NOW known to be a significant threat to human health, especially children, pregnant women, females more than males generally, and elderly populations. There are reasons to also criticize NRC analysis, methodology, continued reliance on obsolete standards which measure impacts of radiation, only using an adult healthy male during testing. In the real world however, populations in communities where radiation exposure levels will affect those living near reactors, waste storage sites, decommissioning plants, and other nuclear facilities for prolonged periods, and varying time frames as families grow. The 'take away' is that this important new scientific evidence should cause NRC to withdraw this proposed rule promoting a disproved 'hormesis model' immediately, and if anything, should require allowable exposure limits to be made even more protective, especially to protect real populations of people living in reactor communities who are not just the NRC model of a healthy adult male.

Thank you for thoughtful consideration.