

## RulemakingForm3CEm Resource

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**From:** Connie Kline <klineisfine@aol.com>  
**Sent:** Friday, August 21, 2015 6:11 AM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

Dear Secretary,

The NRC should completely reject the three petitions for rulemaking cited in the subject line. The Commission never should have accepted them for public comment because they lack any scientific basis.

These three petitions seek to drastically weaken radiation protection standards and change the NRC's regulations from the Linear No-Threshold (LNT) model endorsed by the National Academies of Sciences (NAS) to a "hormesis" model accepted by only a few pro-nuclear power fanatics with a vested interest and agenda. Indeed, the hormesis model makes a mockery of well documented scientific evidence that any dose of radiation exposure may be harmful and should be avoided if possible. Without any valid, reliable evidence, hormesis incredibly and irresponsibly argues that low doses of radiation exposure may actually be beneficial.

As 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 conduct in order to update radiation risk information. NRC should not be considering radical, baseless proposals that contradict its own update.

Further, the US Environmental Protection Agency (EPA) is charged with setting public radiation protection overall, and EPA's 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. Adoption by the NRC of the "hormesis" model would put the Commission in direct and unnecessary conflict with the EPA on this critical issue of public health and safety regulation.

As the chief of EPA's radiation section said in 2009, "Although recent radiobiological findings indicate novel damage and repair processes at low doses, LNT is supported by data from both epidemiology and radiobiology. 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".

If anything, the NRC should strengthen radiation standards. Significant research indicates that long-term exposure to low levels of radiation may carry a greater risk of harm than the LNT model presents. It is also well established that radiation causes health damage in addition to cancer, but the regulations and risk studies ignore these, and are therefore inadequate.

The petitioners have done the nation a disservice by attempting to weaken these standards using a scientifically unsupported model which diverts attention from the need to strengthen radiation protection standards given the reality that radiation is more harmful to children, especially girls, and more damaging to women than to men. The "standard man" approach used by the NRC allows greater exposure levels to the most vulnerable segments of the population.

Any changes to radiation regulations contemplated by the NRC should be in the direction of strengthening, not weakening them.

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