

Rulemaking1CEm Resource

From: RulemakingComments Resource
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To: Rulemaking1CEm Resource
Subject: FW: Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

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

COMMENT#: 444

-----Original Message-----

From: Patricia Lewis [mailto:patricia.lewis@radonmine.com]

Sent: Saturday, August 22, 2015 2:42 PM

To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>

Subject: [External_Sender] Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

Dear Secretary,

The NRC should NOT reject the three petitions for rulemaking cited in the subject line out of hand. The petitions are based on sound, proven science.

These three petitions seek to strengthen protection and protect the public from over regulation. It will change the NRC's regulations from the Linear No-Threshold (LNT) model to a "hormesis" model accepted by knowledgeable professionals around the world. Indeed, the hormesis model, recognizes the protective effects of low doses of radiation exposure thus saving the public from spending unnecessary funds on over-regulation.

Though 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." facts actually contradict this finding.

Even though the EPA likes the NRC's current standards, those standards continue to be based on the LNT model - a model not substantiated by the science.

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 today's science (not 2006, 2009), the consensus positions of key scientific and governmental bodies, the EPA must modify its approach in the future.

The NRC should NOT move in the opposite direction, as significant research indicates that long-term exposure to low levels of radiation do not carry a greater risk of harm than the LNT model presents. Studies do NOT ignore the risks at high levels of radiation exposure.

The petitioners have NOT done the nation a disservice by attempting to weaken these standards and are not using scientifically suspect models. Attention is directed towards understanding at what level low levels of radiation exposure are of no concern and to what degree they are beneficial. Fear mongering is more harmful to human health especially if higher standards are set.

Any changes to radiation regulations contemplated by the NRC should be in the direction of understanding the science of radiation exposure at low levels.

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