

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Tuesday, November 10, 2015 3:37 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: [External\_Sender] Comments on PRM-20-20, 19, & 18. Alara and no lower limit to damage.

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FRN#: 80FR35870

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SECY DOCKET DATE: 11/10/15

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

COMMENT#: 459

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

From: Marv Lewis [mailto:marvlewis@juno.com]

Sent: Tuesday, November 10, 2015 1:43 PM

To: CHAIRMAN Resource <CHAIRMAN.Resource@nrc.gov>; dianed@nirs.org; maryo@nirs.org; kevin@beyondnuclear.org; Gallagher, Carol <Carol.Gallagher@nrc.gov>; RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>; RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>; marvlewis@juno.com; kitbob@erols.com; janetmike@comcast.net  
Subject: [External\_Sender] Comments on PRM-20-20, 19, & 18. Alara and no lower limit to damage.

GDear ACMUI members and Chair man,

I refer to three books by J. W. Gofman, M. D.

1. Xrays:Health Effects of Common Exams
2. Radiation & Human Health
3. Radiation induced cancer from low dose exposure.

On page 301 of reference 1, Alice Stewart's discovery that children of mothers who had abdominal xray were almost 2 x's as likely to have cancer as children of mothers who did not have abdominal xray during pregnancy All these books have hundreds of examples of very low level dose doing damage.

I request that ALARA and no threshold to damage be retained and hormesis exposed as plain wrong.

Respectfully submitted,

Marv Lewis

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**Subject:** FW: [External\_Sender] Comments on PRM-20-20, 19, & 18. Alara and no lower limit to damage.  
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