

Rulemaking1CEm Resource

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

COMMENT#: 461

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

From: leenaree@xmission.com [mailto:leenaree@xmission.com]

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Comments to the Nuclear Regulatory Commission on
Petition for Rulemaking: Linear No--]Threshold Model and
Standards for Protection Against Radiation Docket ID
NRC--]2015--]0057 (PRM--]20--]28, PRM--] 20--]29 and
PRM--]20--]30).

Considering available science and NRC fs mandate to protect humans from radioactivity, NRC should maintain the LNT as the basis for radiation exposure regulations. There is no evidence in human health studies, that a hormetic effect is relevant; not for cancer or non--]cancer health impacts. Cancer risk still increases with increasing radiation dose, which fits the LNT model. Cancer isn ft the only impact. Clinical and subclinical non--]cancer impacts, including impaired neural development leading to poor cognitive ability, are associated with very low radiation doses.

Pregnancy and childhood are uniquely vulnerable life stages and show no protective effect from radiation exposure. Studies show that natural background doses of radiation --]--] doses we are normally, and inescapably, exposed to --]--] can give children cancer. Studies have repeatedly shown that adults are also negatively impacted by relatively small doses of radioactivity.

If NRC wants to gsimply h its radiation exposure standards, they need to fully protect for these uniquely vulnerable human life stages (something they fail to do now)

because ensuring protection for those most at risk would protect almost everyone else. The industry has long felt too much money is being spent to keep radiation doses low. The threshold dose allowed by hormesis would save the industry money at the expense of public health.

NRC should recognize that the hormesis phenomena is settled science and not applicable to risk determination or regulation setting.

Thank you,
Eileen McCabe

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