

## RulemakingForm3CEm Resource

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**From:** Elizabeth Dailey <dailey.elizabeth@gmail.com>  
**Sent:** Monday, August 31, 2015 11:17 PM  
**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 reject the three petitions for rulemaking cited in the subject line out of hand. The agency should not even have accepted them for public comment in the first place, as they are frivolous and based on unsound science.

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 to a "hormesis" model accepted by no one but a few pro-nuclear power fanatics. Indeed, the hormesis model, rather than recognizing that any dose of radiation exposure may be harmful and should be avoided if possible, turns that scientifically-documented premise on its head and argues that low doses of radiation exposure may actually be beneficial. There is no solid evidence of any kind that that is the case.

If anything, the NRC should move in the opposite direction, as 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 other kinds of health damage in addition to cancer, but the regulations and risk studies ignore these, and thus are inadequate in that sense.

The petitioners have done the nation a disservice by attempting to weaken these standards using a scientifically suspect model, and thus directing attention away from the real need to strengthen those standards, in particular to account for the reality that radiation is more harmful to children, especially girls, and to women than it is to men, and that the "standard man" approach used by the NRC allows for even greater exposure levels to those who are more vulnerable.

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

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