

RulemakingForm3CEm Resource

From: Lois Sturm <sturml@sullcrom.com>
Sent: Friday, September 04, 2015 2:31 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.

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."

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".

Long-term exposure to low levels of radiation carries a greater risk of harm than shown with the LNT model, just as long-term exposure to low levels of stress has been shown to be more damaging than the stress from short-term crises.

Radiation also causes genetic damage, which plays out over many generations.

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

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