

Rulemaking1CEm Resource

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Subject: FW: DOCKET ID NRC-2015-0057

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SECY DOCKET DATE: 11/18/15

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

COMMENT#: 534

From: Robert Howarth [mailto:robhhow@gmail.com]
Sent: Wednesday, November 18, 2015 8:46 PM
To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>
Subject: [External_Sender] DOCKET ID NRC-2015-0057

Nov.18, 2015

To Secretary

U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

ATTN: Rulemaking and Adjudications Staff

SUBJECT: Docket ID NRC-2015-0057

These comments are in response to three petitions sent to the NRC in February 2015, NRC Docket number NRC-2015-0057. The petitions are closely related and ask the NRC to amend regulation 10 CFR 20, which limits how much ionizing radiation the general public can get, on top of background radiation (not including medical exposures) and to workers at NRC regulated facilities.

The petitions for rulemaking were filed by D. Carol Marcus (PRM-28), Mr. Mark Miller (PRM-29), and Dr. Mohan Doss (PRM-30). On the Web at <http://www.regulations.gov/#!documentDetail;D=NRC-2015-0057-0010>

From my readings and study I believe there is no empirical evidence for a “safe” dose of radiation and there is growing evidence to support the finding that any exposure to ionizing radiation carries risk of harm. To propose that NRC allow change from the Linear No-Threshold (LNT) model as a basis for regulating exposure to ionizing radiation seems risky and without merit. The BEIR VII study results support a simple proportionate relationship at low doses between radiation dose and cancer risk, i.e. a LNT relationship. Other scientific confirmation of LNT has been cited by the EPA in their Oct.7, 2015 letter to NRC. I strongly urge you to digest them and deny the petitions.

There is no level of radiation exposure that produces direct health benefit with sufficient evidence to end any debate and declare it a fact: radiation exposure never directly improves health. Claims of Hormesis are false.

Petitioners appear to be declaring a war on the unborn, children, women and elders. These, especially the very young, suffer greater harm from even low level ionizing radiation than adult males. It is reasonable and safer that Federal agencies continue to regulate on the basis of no safe dose – I want my and other citizens’ children and grandchildren to grow and live in good health without the fear of an increasing, cumulative low level ionizing radiation menace.

For all of these reasons I strongly urge NRC to deny these petitions.

Thank you for inviting these and other comments.

Robert F. Howarth

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