

## Rulemaking1CEm Resource

---

**From:** RulemakingComments Resource  
**Sent:** Thursday, November 19, 2015 10:23 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

DOCKETED BY USNRC—OFFICE OF THE SECRETARY

SECY-067

PR#: PRM-20-28, PRM-20-29, and PRM-20-30

FRN#: 80FR35870

NRC DOCKET#: NRC-2015-0057

SECY DOCKET DATE: 11/19/15

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

COMMENT#: 536

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

From: Larry Gilman [mailto:LGILMAN@myfairpoint.net]

Sent: Thursday, November 19, 2015 10:03 AM

To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>

Cc: Larry Gilman <LGILMAN@myfairpoint.net>

Subject: [External\_Sender] Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

Thank you for receiving my comment.

The hormetic hypothesis is unsupported by data in humans. Although some evidence on its behalf exists in animal studies, the great bulk of even this type of evidence is against it, and its underlying causal hypothesis is dubious. There is also a strong pull toward confirmation bias in hormetic studies, since the existence of a hormetic effect has been so ardently desired for so long by so many state and corporate research funders.

Therefore, as a matter of elementary conservatism, the hormetic hypothesis does not rise to the level of serious consideration in shaping policy. Even a weak precautionary principle should rule it out, barring a thorough transformation in the field of evidence — of which there is yet no sign.

Sincerely,

Larry Gilman

PhD Engineering Sciences, Dartmouth 1995

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
**Email Number:** 1333

**Mail Envelope Properties** (8bf2a1f624a448cdb3b26aa3c917f5cf)

**Subject:** FW: Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057  
**Sent Date:** 11/19/2015 10:22:58 AM  
**Received Date:** 11/19/2015 10:22:59 AM  
**From:** RulemakingComments Resource

**Created By:** RulemakingComments.Resource@nrc.gov

**Recipients:**  
"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQPWMSMRS02.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1454	11/19/2015 10:22:59 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**