

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Thursday, November 19, 2015 10:25 AM
To: Rulemaking1CEm Resource
Subject: FW: Docket ID NRC-2015-0057 - Deregulating Radiation Exposure
Attachments: 11-18-15 Deregulation of Radiation Exposure - ACE Comments to NRC.docx

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NRC DOCKET#: NRC-2015-0057

SECY DOCKET DATE: 11/19/15

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

COMMENT#: 537

From: aceactivists@comcast.net [mailto:aceactivists@comcast.net]
Sent: Thursday, November 19, 2015 10:10 AM
To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>; Burns, Stephen <Stephen.Burns@nrc.gov>
Subject: [External_Sender] Docket ID NRC-2015-0057 - Deregulating Radiation Exposure

11-18-15

To: **U.S. Nuclear Regulatory Commission Secretary**
Washington, D.C. 20555-0001

From: **The Alliance For A Clean Environment (ACE)**
Dr. Lewis Cuthbert
1189 Foxview Road
Pottstown, PA 19465
aceactivists@comcast.net

ATTN: **Rulemaking and Adjudications Staff**

SUBJECT: **Docket ID NRC-2015-0057**
Deregulating Radiation Exposure

ACE strenuously objects to this irrational, industry-biased proposal to deregulate radiation exposure. Radiation standards should be strengthened, NOT eliminated.

- Even current radiation regulations fail to sufficiently protect both the public and workers. Shocking cancer statistics, especially in children, in communities continuously exposed to Limerick Nuclear Plant's radioactive releases into our air and water prove we are

not sufficiently protected. Clearly, continued low-dose cumulative radiation is just as harmful as one large dose.

- There is growing evidence that any exposure to ionizing radiation carries risk of harm. To protect public health across our nation, NRC and EPA must continue to regulate on the well established basis of "no safe dose".

The unsubstantiated lie that radiation exposure is good for you is an appalling and obscene assault on the unborn, children, women, and elderly in the entire Greater Philadelphia Region. Documented evidence shows alarming unprecedented harms in communities exposed to Limerick Nuclear Plant's decades of radioactive releases. To claim Limerick's radioactive releases are good for us adds insult to injury.

- Since 1985 when Limerick started operating, we have been exposed to Limerick's additive, cumulative, and synergistic routine and accidental radiation releases into our air and water.
- By the late 1990s and early 2000s evidence of harm was clear. There were many shocking documented cancer statistics after Limerick started operating. See: www.acereport.org - Section 2 "*Cancer - Skyrocketing Increases: Links to Limerick*"
- Cancer rates, especially in children, skyrocketed after Limerick Nuclear Plant started operating in 1985. Childhood cancer rates in six communities near Limerick skyrocketed to 92.5% higher than the national average by the late 1990s. Testing confirmed our children also had some of the highest levels of Strontium-90 radiation in their baby teeth. Limerick has been releasing SR-90 into our environment and our children since 1985.
- Over 1/2 of our many children with cancer had leukemia. Vast numbers of children developed leukemia after Chernobyl. Links to ionizing radiation exposure are clear.
- Infant and neonatal mortality were documented to be far higher than the state average and even higher than the two closest cities, Philadelphia and Reading. (State data reported by EPA in 2003). Infant mortality has risen when nuclear plants open and lower when they close, according to research.

Poisoning the air, water, soil, and people around nuclear plants with a broad range of radionuclides clearly harms health. A body of evidence related to Limerick Nuclear Plant's radiation proves that.

See: www.acereport.org Section 1 "Radiation - Limerick's Routine Releases" and Section 3 "Radiation - No Safe Dose".

To claim Limerick's routine and accidental radioactive releases over the past 30 years have been good for us is not only demonstrably false, but it is also absurd, insulting, and unsubstantiated. A body of evidence suggests exposure to Limerick's radioactive releases has been extremely harmful. Two examples:

- Breast cancer rates in six communities near Limerick were far higher than the national average in every age group - 51% higher in women 30 to 44. This is significant, given the fact that breast cancer is an epidemic across the nation. Breast cancer has been linked to radiation exposure. After Limerick started operating, breast cancer rates rose in this region, while at the same time they decreased around a nuclear plant that closed in California.
- Thyroid cancer was:
 - 56% higher than the national average in Montgomery County, the home of Limerick,
 - 53.9% higher in bordering Chester County, and
 - 14.6% higher upwind from Limerick in Berks County.

In 1998, 1999, 2000 the Thyroid Cancer rate was about 75% HIGHER than the U.S. rate (Also Rising) Source: CDC Website

There was a 128% INCREASE in Thyroid Cancer in the Montgomery County rate (1985-86 to 1996-97)

Source: Pennsylvania State Cancer Registry

LINKS to Limerick's routine radiation emissions:

Those Closest and Downwind To Limerick Have Highest Thyroid Cancer Rates Above U.S. Average

Nuclear Plant Radiation Releases Clearly Impact The Thyroid Gland. Nuclear plants, including Limerick, routinely release radioactive iodine. Radioactive iodine attacks the thyroid gland, a fact confirmed by the potassium Iodide pills issued to residents within 10 miles of a nuclear plant to protect the thyroid in case of an accident or terrorist attack.

Thyroid cancer is one of the most radiation-sensitive cancers. Radioactive iodine released from nuclear plants seeks out the thyroid gland and destroys its cells.

A 2009 scientific article reported a Thyroid Cancer Epidemic in a small 90-mile radius encompassing eastern PA, central New Jersey, and southern New York, where 16 reactors are located, including Limerick.

Data above provides sufficient evidence to end the shocking claim that radiation exposure is good for us. Claims of Hormesis are absolutely FALSE.

The shocking claim that radiation is good for you is a thinly veiled shameful scheme to allow the nuclear industry to avoid accountability and liability for the consequences of the radiation they release routinely and accidentally.

➤ To protect the public's health, safety, and financial interests, this scheme to avoid accountability and liability for radiation releases must be rejected by NRC.

Eliminating accountability and liability would increase risks of radioactive disasters.

- Without accountability and risks of liability for nuclear industry owners, they will become even more reckless than they already are when making decisions that avoid important safety upgrades and maintenance.
- The lie about the consequences of radiation exposure eliminates the incentive for the nuclear industry to do all it can to prevent disasters. To give them a free pass, even after severe radiation accidents including meltdowns, would mean they can afford to avoid all costs for safety maintenance.
- The public would be even at more risk for huge radiation accidents and meltdowns that would release massive amounts of radiation.

- Victims would lose everything, while the nuclear industry owners would walk away without any liability compensation.

Based on NRC's previous deception about radiation exposure from Limerick Nuclear Plant, we are extremely concerned that NRC could make a negligent decision to once again lie about the consequences of radiation exposure. This would be a grave injustice to the public and significantly increase threats to public health.

- We found that NRC has been complicit in nuclear industry lies about radiation releases from Limerick Nuclear Plant since the late 1990s, when we started investigating why so children had cancer in our community.
- First NRC repeatedly lied to us when claiming no radiation was being released from Limerick Nuclear Plant. We finally proved otherwise using NRC's own documents.
- Then NRC started making the unsubstantiated claim that radiation releases from Limerick Nuclear Plant were small, when in fact, NRC has NO accurate idea how much radiation is routinely and accidentally released from Limerick Nuclear Plant into our air, water, and soil.
- NRC NEVER MONITORED OR TESTED for all of over 100 radionuclides associated with Limerick operations, yet illogically continues to claim releases are small.
- Exelon's self-serving monitoring is unreliable and unable to accurately determine risk, yet NRC just keeps allowing one dangerous loophole after the other. Our careful evaluation of Exelon's Radiological Monitoring reports, as well as evidence elsewhere, confirms our conclusions.
- NRC has allowed Exelon loopholes and other tactics designed to deceive the public. For example, Limerick has been allowed to have up to 36% margins of error in radioactive fission gas emissions, the kind that are increasing up to 30% with Limerick's use of high-burn nuclear fuel.
- Limerick's accidental radiation releases are not accurately measured by anyone. Spikes from radiation accidents are ignored by Exelon reporting calculations and averages. Our fetuses and children, most impacted from Limerick's radioactive releases, don't have the luxury of ignoring those spikes.
- Reporting that subtracts background radiation levels before reporting are extremely deceptive, as background levels around a nuclear plant logically increase after decades of being subjected to routine and accidental radioactive releases, many which have very long half-lives.

ACE is providing these comments to NRC to OPPOSE the unsubstantiated assertions from the three petitions sent to NRC in February 2015, asking NRC to amend its regulations related to how much ionizing radiation the public can get on top of background radiation from NRC regulated facilities.

Thank you for consideration of our sincere alarm and concerns about this NRC decision.

Please inform ACE of your decision. Please provide a substantiated rationale for your decision.

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