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**Docket:** NRC-2015-0063

Reassessment of NRC's Dollar Per Person-Rem Conversion Factor Policy

**Comment On:** NRC-2015-0063-0004

Reassessment of NRC's Dollar Per Person-Rem Conversion Factor Policy; Draft NUREG for Comment

**Document:** NRC-2015-0063-DRAFT-0013

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## General Comment

I think it is good thing to properly increase the value of life, in evaluating how radiation and heavy metal releases from nuclear plants under normal operating conditions and when emergencies happen.

So the purported intent of this regulation is supported.

I am well educated in the nuclear, radiation, and overall energy fields. Having an MSME from the University of Michigan in Thermal Fluids and Material Science, and having worked in the energy industry since 1985, I feel well justified in making the following comments:

But not how it is worded, which appears to leave plenty of "outs" to allow continued damage to the citizens and ratepayers who pay the salaries of the NRC and our government overall.

1st, the older you get, does not make your life less valuable. And this also assumes that all radiation does is cause cancer, indeed it does a lot more than that, causes immune system suppression which allow many types of disease to take a pot shot, at any age, but especially at the over 50 crowd.

2nd, it is disingenuous at best to use a discount rate to discount the current value of life from a future value, absurdly created by an accident of unknown date that "you can't prove". We don't know inflation going forward, but with no end in sight to money printing, regardless of jawboning to give confidence in holding T bills, but we can easily assume that the value of US dollars will continue to go down as we overspend on the government budget. This is exactly the same as printing. therefore the cost of a future cancer should not be discounted backwards, but should be inflated forwards. Even if we accepted the "discount backwards" model, using a rate of 7% is absurd, when is the last time you thought you could get a 7% return on any investment,

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short of high risk junk bonds.

3rd, Using the ICRP model instead of taxpayer funded BEIR 7 is just a way to lowball the cost. The ICRP model is flawed, as an example ICRP indicates that Cesium 137 is only twice as dangerous as natural Potassium K40. Live has thrived on earth for hundreds of millions of years, with little change in the k40 present, and almost all live forms using K and thus K40 as an important element.

4th, whenever I see the phrase "to be consistent with" my ears immediately perk up and look for the real intention...usually a deception of some sort. So when I saw ""2 In order to be consistent with the Commission's policy on metrication (57 FR 46202), the conversion factor should be expressed in dollars per person-sievert (Sv) with the value in English units following parenthetically."

My take on this? Using Sievert is just plain wrong, it is a huge measure of radiation, and a way to minimize things to the average citizen who hasn't studied radiation. Plus it makes the "payout" or value of life appear to be very high. It is much more appropriate to express all terms in mSV, please do so.

5th, not only does this need to take into account the "human cost" of not just Mortality, but also of Morbidity, and I really don't see how ICRP does this, even though the docket claims that it does. Also, it appears that health care cost itself is not included, which is amazing, almost incredulous. My ACA care costs \$750 a month and that is with a \$12,000 deductible per year. Many cancer drugs cost over \$100,000 per year and its getting worse. Ignoring the cost of health care is wrong.

6th, what about the costs related to plants and animals? This human centric view of things does limits the damage. Even if you don't care about animals....they have value to humans and you should care about that.

7th, ALARA, well that will be conveniently be able to be discarded if the other NRC proposal generated from the radiation industry to throw out LNT and then just, replace it with "hormesis, radiation is good for you" or as "doctor" Carol Marcus states....."why deprive them (the general public due to random radiation releases) of the benefits of radiation".

Concluding: this document starts with a worthy premise, but the construct seems to be disingenious. We all know the nuclear industry is challenged by more economic energy technologies, and even without the negative side effects of uranium mining and "normal" releases from nuclear plants, and the long term danger of nuclear waste.....even without those, it would still make sense to not try to "support" an industry that has been proven to be too complex, too costly.