

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Thursday, November 19, 2015 5:11 PM
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Subject: FW: NRC Docket 2015-0057

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SECY-067

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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#: 542

From: Cindy Folkers [mailto:cindy@beyondnuclear.org]
Sent: Thursday, November 19, 2015 1:58 PM
To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>
Subject: [External_Sender] NRC Docket 2015-0057

A [change.org petition](#) was launched on this PRM. Just over 2400 people have signed it as of the November 19, 2015, 2pm EST. While the signatures and additional comments should have been sent to the US NRC, the text of the petition might not have been. Below is this petition text.

United States Nuclear Regulatory Commission (NRC) (NRC Docket 2015-0057)
Protect children from radiation exposure!

The NRC is entertaining a petition that argues “a little radiation is good for you”- a concept dubbed “hormesis.” They say that the public should be exposed to higher doses of radiation, arguing “Why deprive the public of the benefits...?”

But exposing in utero and childhood life stages to background radiation ALREADY risks giving them cancer. See link <https://www.youtube.com/watch?v=XTijIRsxTSE&feature=youtu.be>

And studies show that adding more radiation does not decrease the amount of cancer for either of these vulnerable life stages, or for adults.

Specifically, the petitioners are challenging the Linear-no-threshold (LNT) model, on which current world-wide radiation exposure regulations are based; and as long affirmed by the U.S. National Academy of Science in its Biological Effects of Ionizing Radiation reports. They contend it should be replaced with a model based on hormesis instead. But evidence for maintaining the LNT “is comprehensive, cogent and compelling.” See link <http://www.ianfairlie.org/wp-content/uploads/2015/08/US-NRC-Consultation-pdf.pdf>

Furthermore, studies of childhood cancer risks indicate that none of the current or proposed exposure limits for

the in utero life stage are protective enough. Right now, radiation is allowed to cause 1 fatal cancer in 286 people exposed (1 in 143 cancer incidence).

EPA risk goals protect to 1 in 10,000 risk for cancer incidence for other toxins. Setting a risk standard for radiation that causes so much more cancer than allowed by EPA makes radiation a privileged pollutant. This risk number does not include sensitive life cycles.

Since current radiation exposure standards fail to protect for vulnerable life stages, basing NRC radiation exposure standards on the hormetic model will further endanger the most vulnerable in order to protect nuclear industry profits.

Therefore, NRC must not only reject the petitioners' request, but also lower its current exposure standards to protect the most vulnerable.

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