

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Thursday, November 19, 2015 5:15 PM
To: Rulemaking1CEm Resource
Subject: FW: Comment on the Nuclear Regulatory Commission (NRC) Proposed Rule: Linear No-Threshold Model and Standards for Protection Against Radiation; Notice of Docketing and Request for Comment
Attachments: to nrc tatsiana novikava.pdf

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SECY DOCKET DATE: 11/19/15

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

COMMENT#: 544

From: Tati [mailto:novikova@gmail.com]

Sent: Thursday, November 19, 2015 4:14 PM

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

Subject: [External_Sender] Comment on the Nuclear Regulatory Commission (NRC) Proposed Rule: Linear No-Threshold Model and Standards for Protection Against Radiation; Notice of Docketing and Request for Comment

Dear Sir/Madam,

Submit, please, my comment in the pdf-file, attached to this letter.

Best regards,
Tatsiana Novikava
environmental journalist

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 1342

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19 November, 2015

To **United States Nuclear Regulatory Commission (NRC)** (NRC Docket 2015-0057)

From Tatsiana Novikava,
11853 Acorn Ridge Rd, Spearfish, SD, 57783

Dear NRC Personnel:

I encourage you to deny the changes of 10 CFR part 20 that are based on the LNT hypothesis to the so called hormesis model and to keep the existing rules.

There are some important reasons to deny the petitioners proposed rule changes.

1. There is not enough evidence on the scientific basis of hormesis theory. The theory of beneficial low doses of gamma-radiation refers to some experiments, regarding the response of the immune system to low radiation doses. In-vivo, such response is a temporary reaction (like recovery after any mechanical injury of the body) and there is no evidence that this reaction revitalizes the health on a long-term basis. On the contrary, at the present time there is a lot of evidence that low doses of radiation are indeed dangerous, especially for pregnant women and children under five years.

Exposure in utero and during childhood to background radiation already increases the risk of cancer. See <http://www.ipnw.org/pdf/mgs/6-1-korblein.pdf>

2. The justification for the new proposed regulation is built on false and ridiculous theses. Let's look at the assumption that increasing the acceptable minimal level of exposure could prevent panic in case of probable radioactive accidents on Nuclear Power Plants. Petitioner Dr. Mohan Doss says: "Any potential future accident involving release of radioactive materials in the USA would likely result in panic evacuation because of the LNT—model-based cancer fears and concerns, resulting in considerable casualties and economic damage such as have occurred in Fukushima."

LNT itself can't provoke the panic evacuation. The reason for it is an accident, not a model. Besides this, a potential future accident could cause a large release of radiation, because the event would not be regular or maintained at the low doses used in the experiments.

Because a radioactive accident may occur with low as well as with high radiation doses, as well with exposure of highly dangerous I-131, the petitioners' proposals for minimal acceptable doses do not make sense. The so-called hormesis model is not applicable to panic in the case of radioactive accidents at all.

3. Hormesis theory is not applicable to the releases of radioactive materials by the facilities of industry such as uranium mines, Nuclear Power Plants, nuclear test sites, fracking sites, rare earth extraction, etc. Possible releases from Nuclear Power Plants even during normal, trouble-free function, could disseminate dangerous biologically active radionuclides as I-131, I-129, Cs-137, Sr-90, which are accumulated by biological organisms, including humans. In the case of accumulation on a long-term basis, the doses, initially low, accumulate and multiply in the body, producing harmful effects. The evidence of this is presented by the consequences of Chernobyl and Fukushima. In particular, the

rise of the growth levels of thyroid cancer among children living in the affected territories, suffered from low doses of radiation, caused by Chernobyl.

In addition, it is very important that the health effects of radiation itself are independent of the additional health effects of the heavy metals that the radiation is associated with. A radionuclide like plutonium-238 emits low doses of radiation and at the same time it is a toxic heavy metal. Heavy metals themselves cause significant damage to health, even at low levels, independent of the radiation they give off, making for a "double whammy" to the living body of plants, animals and humans.

In the USA there are a lot of sites emitting low radiation doses including old mining sites, nuclear test sites, fracking sites, nuclear reactor sites, etc., which are also sites that contain significant amounts of hazardous waste and heavy metals that need to be addressed as Superfund sites, not as proposed new "limited use" sites, as would be the case if this proposal were adopted.

I encourage the NRC to follow its mandate and protect the people of the United States, rather than protecting industries.

Sincerely,
Tatsiana Novikava