

## Rulemaking1CEm Resource

---

**From:** RulemakingComments Resource  
**Sent:** Friday, November 20, 2015 8:43 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Docket ID NRC-2015-0057  
**Attachments:** NRC Docket ID NRC-2015-0057 DRA comments.docx

### 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#:** 549

---

**From:** Gena Parkhurst [mailto:gmp66@hotmail.com]  
**Sent:** Thursday, November 19, 2015 9:06 PM  
**To:** RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>  
**Subject:** [External\_Sender] Docket ID NRC-2015-0057

**TO:** Carol Gallagher, Nuclear Regulatory Commission  
Docket ID NRC-2015-0057  
Nov. 17, 2015  
Rapid City, SD

WHEREAS the NRC has stated it is examining petitions to relax “Standards for Protection Against Radiation” to determine whether these should be considered in rulemaking and is requesting public comments;  
WHEREAS NRC agreement with these petitions would introduce rules to weaken radiation protection standards at US nuclear facilities;

WHEREAS the NRC apparently pays attention to the evidence on risks of low levels of radiation;

WHEREAS Dakota Rural Action is a 28-year-old statewide grassroots non-profit committed to protect ground water and air quality from pollution;

NOW THEREFORE, the Black Hills Chapter of this South Dakota membership organization respectfully submits the following comments:

There is no safe dose of radiation. International and U.S. scientific bodies and reports have concluded that there is "no threshold" for radiation exposure. Any amount can harm a person.

The hormesis theory is just that, a theory. The U.S. Department of Energy itself affirms challenges to this concept, which posits that every little bit of radiation can help build up resistance to cancer. Whilst it is unproven, we support acting on the basis of the U.N. Precautionary Principle and rejecting any moves to loosen regulations on radiation emissions.

The promoters of hormesis theory only minimally cloak their ulterior motive that they would benefit by making money off the suffering of those exposed to radiation, because less regulation means more sales of radioactive materials and more medical business for treating cancer from radiation’s proven cumulative effects.

Rather than easing up on radiation protections, regulators should be tightening them to respond to findings more recent than the existing rules. These findings demonstrate that women and children are more susceptible to the ill effects of radiation. We urge the standards be targeted to assure that the most radiation sensitive groups in our lifecycle are protected.

The idea that nuclear industry workers should be allowed to be exposed to more radiation than non-industry workers is preposterous. Raising the general public's permissible levels of exposure to the workers' permissible level is even more outlandish. Petitioners' proposals in that regard should be dismissed out of hand. Workers' permissible levels should be reduced to that of the general public's and targeted to their gender.

In conclusion, we encourage you to deny the petitioners' proposed changes of 10 CFR Part 20 and instead make plans to increase radiation protections to respond to the Precautionary Principle and the defense of the most vulnerable members of not only society but also the rest of the natural world.

Thank you for your consideration,

Gena Parkhurst, Chairperson

Black Hills Chapter, Dakota Rural Action

*Dakota Rural Action field office:*

*Josh McDonald, Organizer*

*Dakota Rural Action*

*518 6th Street, Suite 6*

*Rapid City, SD 57701*

*605-716-2200*

[\*jmcdonald@dakotarural.org\*](mailto:jmcdonald@dakotarural.org)

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
**Email Number:** 1347

**Mail Envelope Properties** (381816cd463a4213a2a166a9fd27ba33)

**Subject:** FW: Docket ID NRC-2015-0057  
**Sent Date:** 11/20/2015 8:42:37 AM  
**Received Date:** 11/20/2015 8:42:38 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	3692	11/20/2015 8:42:38 AM
NRC Docket ID NRC-2015-0057 DRA comments.docx		128221

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



TO: Carol Gallagher, Nuclear Regulatory Commission  
Docket ID NRC-2015-0057

Nov. 17, 2015

Rapid City, SD

WHEREAS the NRC has stated it is examining petitions to relax "Standards for Protection Against Radiation" to determine whether these should be considered in rulemaking and is requesting public comments;

WHEREAS NRC agreement with these petitions would introduce rules to weaken radiation protection standards at US nuclear facilities;

WHEREAS the NRC apparently pays attention to the evidence on risks of low levels of radiation;

WHEREAS Dakota Rural Action is a 28-year-old statewide grassroots non-profit committed to protect ground water and air quality from pollution;

NOW THEREFORE, the Black Hills Chapter of this South Dakota membership organization respectfully submits the following comments:

There is no safe dose of radiation. International and U.S. scientific bodies and reports have concluded that there is "no threshold" for radiation exposure. Any amount can harm a person.

The hormesis theory is just that, a theory. The U.S. Department of Energy itself affirms challenges to this concept, which posits that every little bit of radiation can help build up resistance to cancer. Whilst it is unproven, we support acting on the basis of the U.N. Precautionary Principle and rejecting any moves to loosen regulations on radiation emissions.

The promoters of hormesis theory only minimally cloak their ulterior motive that they would benefit by making money off the suffering of those exposed to radiation, because less regulation means more sales of radioactive materials and more medical business for treating cancer from radiation's proven cumulative effects.

Rather than easing up on radiation protections, regulators should be tightening them to respond to findings more recent than the existing rules. These findings demonstrate that women and children are more susceptible to the ill effects of radiation. We urge the standards be targeted to assure that the most radiation sensitive groups in our lifecycle are protected.

The idea that nuclear industry workers should be allowed to be exposed to more radiation than non-industry workers is preposterous. Raising the general public's permissible levels of exposure to the workers' permissible level is even more outlandish. Petitioners' proposals in that regard should be dismissed out of hand. Workers' permissible levels should be reduced to that of the general public's and targeted to their gender.

In conclusion, we encourage you to deny the petitioners' proposed changes of 10 CFR Part 20 and instead make plans to increase radiation protections to respond to the Precautionary Principle and the defense of the most vulnerable members of not only society but also the rest of the natural world.

Thank you for your consideration,

Gena Parkhurst, Chairperson  
Black Hills Chapter, Dakota Rural Action

*Dakota Rural Action field office:*

*Josh McDonald, Organizer  
Dakota Rural Action  
518 6th Street, Suite 6  
Rapid City, SD 57701  
605-716-2200  
[jmcdonald@dakotarural.org](mailto:jmcdonald@dakotarural.org)*