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To: Rulemaking1CEm Resource
Subject: Comment on PRM-20-28, PRM-20-29, and PRM-20-30
Attachments: NRC-2015-0057-DRAFT-0551.pdf

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

COMMENT#: 566

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Linear No-Threshold Model and Standards for Protection Against Radiation

Comment On: NRC-2015-0057-0086

Linear No-Threshold Model and Standards for Protection Against Radiation; Extension of Comment Period

Document: NRC-2015-0057-DRAFT-0551

Comment on FR Doc # 2015-20722

Submitter Information

Name: Laura Thevenot

General Comment

Attached please find a comment letter from the American Society for Radiation Oncology (ASTRO).

Attachments

ASTRO Final letter LNT v Hormesis Petition for Rulemaking



November 19, 2015

Annette L. Vietti-Cook
Secretary, U.S.
Nuclear Regulatory Commission,
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff.

Re: Petitions for Rulemaking: Linear No-Threshold Model and Standards for Protection Against Radiation [NRC Docket NRC-2015-0057]

Dear Ms. Vietti-Cook:

The American Society for Radiation Oncology (ASTRO) is pleased to comment on the Petitions for Rulemaking: Linear No-Threshold Model and Standards for Protection Against Radiation [NRC Docket NRC-2015-0057].

ASTRO is the largest radiation oncology society in the world, with more than 10,000 members who specialize in treating patients with radiation therapy. As the leading organization in radiation oncology, biology and physics, the Society is dedicated to improving patient care through education, clinical practice, advancement of science and advocacy. ASTRO's highest priority has always been ensuring patients receive the safest, most effective treatments.

ASTRO agrees with the NRC's Advisory Committee on the Medical Use of Isotopes' (ACMUI) recommendation that "subject to reconsideration as additional scientific evidence becomes available, the NRC continue to base the formulation of radiation protection standards on the linear no threshold model." The ACMUI approved this recommendation on an October 28, 2015 public conference call.

ASTRO appreciates the opportunity to provide comments on these petitions for rulemaking, and we look forward to continuing our work with the Commission on this, and other important issues. Should you have any questions, please do not hesitate to contact Cindy Tomlinson, senior manager for security and safety at 703.839.7366 or cindy@astro.org.

Sincerely,

Laura I. Thevenot
Chief Executive Officer