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Linear No-Threshold Model and Standards for Protection Against Radiation

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

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Comment on FR Doc # 2015-20722

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General Comment

See attached file(s)

Attachments

PW COMMENT HORMESIS RULE PROPOSAL 11.19.15

NRC-2015-0057

November 19, 2015

PILGRIM WATCH COMMENT OPPOSING SUBSTITUTING HORMESIS FOR THE LINEAR-NO-THRESHOLD MODEL OF RADIATION PROTECTION

Pilgrim Watch opposes the three petitions for rulemaking (PRM) requesting that the NRC amend its “Standards for Protection against Radiation” regulations and change the basis of those regulations from the linear no-threshold (LNT) model of radiation protection to the radiation hormesis model.

The LNT model assumes that biological damage from radiation is linearly related to exposure and is always harmful - no threshold. The hormesis model assumes that exposures to low radiation levels is beneficial and protects the human body against deleterious effects of high levels of radiation.

Authoritative bodies on radiation health effects support the LNT model and give no credence to hormesis – neither should the NRC.

The Committee to Assess Health Risks from Exposure to Low Levels of Ionizing Radiation, National Research Council of the Academies of Sciences latest report BEIR VII remains the “gold standard” on the subject in the U.S.

Dr. Richard Monson, Associate Dean of the Harvard School of Public Health, said in 2005 in issuing BEIR VII that, “The scientific research base shows that there is no threshold of exposure below which low levels of ionizing radiation can be demonstrated to be harmless or beneficial.”

The Committee reviewed Hormesis in its BEIR VII Phase 2, Appendix D. It concluded that:

The committee concludes that the assumption that any stimulatory hormetic effects from low doses of ionizing radiation will have a significant health benefit to humans that exceeds potential detrimental effects from the radiation exposure is unwarranted at this time.

The Environmental Protection Agency (EPA) is fully supportive of the LNT model. EPA’s Dr. Pushkin, Chief of Radiation Protection Division, explained that:

Although recent radiobiological findings indicate novel damage and repair processes at low doses, LNT is supported by data from both epidemiology and radiobiology.

Given the current state of the science, the consensus positions of key scientific and governmental bodies, as well as the conservatism and calculational convenience of the LNT assumption, it is unlikely that EPA will modify this approach in the near future.

Epidemiology and radiobiology research on low dose health effects were reviewed by four (4) international groups (UNSCEAR (2008), US NCRP Report No 136 (2001), US BEIR VII (2006) and ICRP 99 (2006). These reports confirmed the LNT model for radiation protection purposes - so should the NRC.

We urge the Commission to discard the four petitions and not use them to justify weakening regulatory standards at US nuclear facilities – standards that currently are not strong enough to protect public and worker health. Further the NRC should never have accepted the petitions in the first place; in doing so further eroded public confidence in the agency.

Respectfully submitted,

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