

## **Rulemaking1CEm Resource**

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**Sent:** Monday, November 23, 2015 4:54 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** Comment on PRM-20-28, PRM-20-29, and PRM-20-30  
**Attachments:** NRC-2015-0057-DRAFT-0563.pdf

### **DOCKETED BY USNRC—OFFICE OF THE SECRETARY**

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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#:** 571

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**Docket:** NRC-2015-0057

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-0563

Comment on FR Doc # 2015-20722

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## Submitter Information

**Name:** Henry Robertson

**Submitter's Representative:** Henry Robertson

**Organization:** Great Rivers Environmental Law Center

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## General Comment

Comments of Great Rivers Environmental Law Center attached.

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## Attachments

NRC Radiation Standards comments



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November 19, 2015

**Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001**

**ATTN: Federal Rulemaking and Adjudications Staff**

**Docket ID NRC-2015-0057**

**Re. "Linear No-Threshold Model and Standards for Protection Against Radiation"**

Dear Secretary:

We write in opposition to the three petitions for rulemaking submitted by Mohan Doss, Carol S. Marcus, and Mark L. Miller, who urge the NRC to amend its "Standards for Protection Against Radiation," changing the basis of those regulations from the linear no-threshold (LNT) model of radiation protection to the "hormesis" theory, which is the idea that a little radiation is not only harmless but good for you.

Radiation hormesis is simply an unproven hypothesis. One should not even consider placing millions at risk on the basis of an unproven hypothesis. To do so would be a long-term experiment, during which ever more people would be exposed. The damage caused to a person by ionizing radiation may not manifest itself for many years. In the case of genetic damage, it may not manifest itself for generations.

As Dr. Peter Crane, a former NRC Counsel for Special Projects, said in 2012: "[T]he National Academies of Science, along with the rest of mainstream scientific authority, regard hormesis as wholly without merit."

The LNT has been adopted by the U.S., other countries and international agencies since the 1950s. It continues to have the support of the U.S Environmental Protection Agency, NAS, International Commission on Radiological Protection, the National Council on Radiation Protection and Measurements, the U.N. Scientific Committee on the Effects of Ionizing Radiation, and other expert bodies.

Hormesis is dear to the hearts of nuclear enthusiasts, who also argue that nuclear power is essential to mitigating global warming. Climate change is a primary concern of Great Rivers Environmental Law Center, but it is more economically and less hazardously addressed by energy efficiency measures and renewable energy from wind, solar, geothermal and other sources.

Please deny the three petitions for rulemaking and do not reopen the radiation standards. Thank you.