

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Tuesday, November 24, 2015 3:14 PM
To: Rulemaking1CEm Resource
Subject: Comment on PRM-20-28, PRM-20-29, and PRM-20-30
Attachments: NRC-2015-0057-DRAFT-0572.pdf

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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#: 576

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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-0572

Comment on FR Doc # 2015-20722

Submitter Information

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General Comment

See attached file(s)

Attachments

Response to NRC petition Nov 2015

November 19, 2015
Washington, DC

Re: Docket ID #NRC-2015-0057

Dear Sir or Madam,

The most recent report of the National Academy of Sciences Committee on the Biological Effects of Ionizing Radiation (BEIR VII) concluded, in simple and direct terms, that there is no such thing as a safe dose of radiation. More recent scientific results confirm this viewpoint: for instance, the study of leukemia in radiation-monitored workers, published in *The Lancet* in 2015 (Leuraud et al., "Ionising radiation and risk of death from leukaemia and lymphoma in radiation-monitored workers (INWORKS): an international cohort study"). This recent report confirms a linear dependence of risk upon dose down to the lowest doses.

By contrast, the petitioners advocating for this rule change claim that "Low doses may be hormetic." This is stated as conjecture and is therefore, to be frank, not worthy of consideration. If the scientific understanding has truly evolved over time in a direction that supports a threshold of safety and/or hermetic benefit, then it should be possible to convene an eighth BEIR panel to confirm this belief. Lacking support from the scientific establishment, the Nuclear Regulatory Commission spends its credibility recklessly even by consideration of the requests of these petitioners.

Sincerely yours,

Aaron M. Datesman, Ph.D.

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