

## **Rulemaking1CEm Resource**

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**From:** RulemakingComments Resource  
**Sent:** Wednesday, November 25, 2015 8:32 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** Comment on PRM-20-18, PRM-20-29, and PRM-20-30  
**Attachments:** NRC-2015-0057-DRAFT-0534.pdf

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**FRN#:** 80FR35870

**NRC DOCKET#:** NRC-2015-0057

**SECY DOCKET DATE:** 11/18/15

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

**COMMENT#:** 585

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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-0534

Comment on FR Doc # 2015-20722

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## General Comment

I was a member of the DOE sponsored Effects of Low Level Radiation at the Cellular Level study conducted in the late 1990's. The members of the study group included internationally recognized scientists. The findings of the study included one very important statement. "There is no safe dose of Radiation, all exposures to the body are cumulative." In other words cells are damaged upon exposure. There is no way to eliminate the effects of radiation exposure. I was the co- chair of the Radionuclide Soil Action Level Oversight Panel in Westimimster, Colorado. The study panel spent a year examining documents, studies to determine an appropriate soil action level for plutonium for remediation of the Rocky Flats Plutonium Trigger production facility. The final recommendation was 10 picocuries per gram of soil. The final level set by the State Health Department and EPA was 50 picocuries per gram. That number is just for the top three feet of soil. Now the site is a National Wildlife Refuge. Children are allowed to visit. Bottom line is that we need lower exposure standards I support the EPA . This is a first for me. I am usually criticizing the agency for lack of action.