

## **Rulemaking1CEm Resource**

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**Sent:** Wednesday, November 25, 2015 8:41 AM  
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**Subject:** Comment on PRM-20-18, PRM-20-29, and PRM-20-30  
**Attachments:** NRC-2015-0057-DRAFT-0540.pdf

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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-0540

Comment on FR Doc # 2015-20722

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## General Comment

I am commenting on behalf of Radiation Free Lakeland a voluntary group with thousands of supporters in Cumbria, UK. We oppose any increase in the already dangerous "allowable" dose to the public. Here in Cumbria, Sellafield reprocessing plant routinely pays out to nuclear workers on its Compensation Scheme for Radiation Linked Diseases. The glaring fault with this scheme is that the radiation does not stop at the military style fences surrounding Sellafield, Drigg, Lillyhall and Studsvik in Cumbria UK. We agree with the EPA that there is no safe dose of radiation. Richardson et. al.'s (Oct. 2015) study of nuclear workers in the US, UK, France estimates approximately 100 additional cancers per 100 people after only 10 years of 100 mSv per year exposure. BEIR VII (2005) estimates for 100 mSv are an average of 80 per 100 extra cancers, over a life time, and 100 per 100 for women, actually 101,900 per 100,000 women (see BEIR p. 312 for 1 mSv over a lifetime and multiply by 100). The population outside the military fences of nuclear installations is made up of women and children and people with damaged immune systems who would be much more vulnerable to any increase in "allowable" radiation dose.