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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-0618

Comment on FR Doc # 2015-20722

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General Comment

See attached file(s)

Attachments

Public Comment

November 19, 2015

Emile Julian, Assistant for Rulemaking and Adjudications
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RE: Docket ID NRC-2015-0057 and Petition for Rulemaking PRM-20-28, PRM-20-29, and PRM-20-30

Dear Emile Julian:

It is not apparent that the petitioners have adequately considered the multi-factorial model associated with the probabilistic effects resulting radiation exposure, such as cancer and birth defects. Consideration must be given to other environmental exposures in an individual's environment (e.g., chemical carcinogens) that may also add to or even work together as a synergistic agent to multiply the associated risk from any single exposure alone. Additional research in this area is needed before the U.S. NRC should change a public policy that is widely accepted as an international standard.

The petitioners do establish a clear threshold of radiation exposures that is deemed safe, or theoretically beneficial, across all populations in the United States. Consideration must be given to the most vulnerable populations in our society, including the human fetus, infants, babies and children. Moreover, it is not clear that the petitioners have accounted for the economic benefits derived from working in occupations where radiation exposure is required. Jobs in our field can be fairly lucrative compared to those of other occupations. This may well result in beneficial changes in the workers living environment, diet, exercise, stress reduction, and access to quality healthcare. All of these are potential factors that may collectively offset the adverse effects from radiation exposure. Research is needed to account for such confounding factors.

The petitioners appear to discount that U.S. radiation exposures from manmade sources are significantly increasing due to the increasing use, and probably over-use, of sources of radiation for diagnostic and therapeutic purposes. Such exposures are generally exempted from regulation. With the increasing radiation exposures from medical use, it does not seem to be the time to further relax long standing regulation.

At the biological level, we know that ionizing radiation is damaging, through the production of peroxides and mutations within the human DNA. At low doses, it is theorized, that such exposures stimulate the repair mechanisms in the body, or kick-starting the immune system into action. Yet, with the rise of multiple auto-immune disorders (e.g., Multiple Sclerosis), we must question whether kick-starting the immune system is wise or necessary. Additional research is necessary.

Thank you for the opportunity to comment on this important subject. I hope that my comments will further additional collaborative research between fellow Health Physicist and Public Health Practitioners. Note that my comments are my own and do not necessarily reflect the opinions of my past or present employer or other professional organizations that I am affiliated with.

Appreciatively,

Jason M Kelly, MPH, CPH
Health Physicist