

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Wednesday, November 25, 2015 10:03 AM
To: Rulemaking1CEm Resource
Subject: Comment on PRM-20-28, PRM-20-29, and PRM-20-30

DOCKETED BY USNRC—OFFICE OF THE SECRETARY

SECY-067

PR#: PRM-20-28, PRM-20-29, and PRM-20-30

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#: 630

To: Nuclear Regulatory Commission:

My comment for NRC-2015-0057:

The University of Toronto, in Biological Effects of Radiation, Module 5, has determined:

There is a threshold for radiation damage for stochastic effects, but the threshold varies by individual. there is no threshold for radiation damage for non-stochastic effects--a single photon or electron could produce the effect.

“Since there is no evidence of a lower threshold for the appearance of Stochastic Effects, the prudent course of action is to ensure that all radiation exposures follow a principle known as ALARA (As Low As Reasonable Achievable).”

“It is well known that the foetus is more sensitive to the effects of radiation than the adult human. If an irradiation occurs in the first 30 weeks of pregnancy, delayed effects may appear in the child. These include mental and behaviour retardation, with a delay period of approximately 4 years.”

“In the absence of clear scientific evidence, the regulators adopted a conservative approach and consider all levels of radiation as being potentially damaging to the human body. Because of this, any procedure that involves radioactive materials must abide by the ALARA principle “(1)

Therefore it would be irresponsible and against the public interest for the Nuclear Regulatory Commission to allow a hormesis standard for allowable radiation.

(1) <http://www.ehs.utoronto.ca/services/radiation/radtraining/module5.htm>

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Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 1439

Mail Envelope Properties (d0c3d9a8cccf4f0096933fd736531fb7)

Subject: Comment on PRM-20-28, PRM-20-29, and PRM-20-30
Sent Date: 11/25/2015 10:03:05 AM
Received Date: 11/25/2015 10:03:05 AM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:
"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS02.nrc.gov

Files	Size	Date & Time
MESSAGE	1848	11/25/2015 10:03:05 AM

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Priority: Standard
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Expiration Date:
Recipients Received: