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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0063

Reassessment of NRC's Dollar Per Person-Rem Conversion Factor Policy

**Comment On:** NRC-2015-0063-0004

Reassessment of NRC's Dollar Per Person-Rem Conversion Factor Policy; Draft NUREG for Comment

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Comment on FR Doc # 2015-22050

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## General Comment

Even the IMF considers medical costs from radioactive pollution an unfair subsidy to the energy sector, which should be factored in, and they have pointed this out repeatedly.

<http://www.imf.org/external/pubs/ft/survey/so/2015/NEW070215A.htm>

DG-7-1

Why isn't the medical cost of radioactive pollution factored into the equation?

DG-7-2

Why not use REAL numbers, instead of made up ICRP numbers?

According to BEIR VII, for those who die, the life-shortening effects are on the order of 14 to 15 years. Currently the average monthly cost of new cancer medications, according to Memorial Sloane-Kettering, is around \$10,000 per month (median), which is \$120,000 per year, and thus \$1.8 million for 15 years, if the prices don't rise, but the prices have been rising and rapidly so. This is cost of medication alone, and excludes the cost of doctors, hospitals, and social or financial cost of caregivers for the ill, and lost of "free" caregivers for children and the elderly, by loss of those who are middle aged, through illness and/or death. In short, it excludes value of work done, whether paid or unpaid. Women are disproportionately impacted by radiation induced cancers, as well, and women as a whole do much of the unpaid work, which allows continuing functioning of a household, and without which there may be need for hiring a maid. Already the high cancer drug prices are being decried, even by some with ties to big pharma, it's so bad. Life-boat ethics is kicking in. For instance, some cancer drugs are unavailable in the UK Public Health System due to high price and cost-cutting (even while they, like the US, find money to subsidize the mostly foreign nuclear industry). Even where people have private insurance, there are limitations in coverage; bankruptcy may have to be declared, and the taxpayer most likely picks up cost (or the person doesn't get the needed care).

**SUNSI Review Complete**

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**Add= A. Payne (Axb14)**

Just before BEIR VII was completed in 2005, a 15 country study of nuclear workers was published, which showed that the cancer risks were much higher than stated in the BEIR report. In an Appendix, BEIR VII says that they did not have time to take it into consideration. Additionally, there is a very recent 3 country INWORKS study of nuclear workers, which suggests that excess cancer rates from ionizing radiation are around 10 times higher than concluded by the BEIR report. Frighteningly, this appears a middle of the road number, which sits between BEIR VII and the 15 country INWORKS study.

<https://miningawareness.wordpress.com/2015/10/30/usnrc-value-of-death-update-all-tricks-no-value-of-life-no-medical-care-or-caregiver-costs/>

DG-7-3 Why is there a backwards discount, which does not make any sense?

The person rem value of statistical life should not be discounted backwards 7%, but compounded FORWARD 7 percent.

DG-7-4 The NRC rule provides a value of life rated at around \$36,000, and perhaps as low as \$4,000 or less. When a life lost is worth so little, it actually encourages radioactive pollution. Is the NRC protecting public health, or promoting industry values that cheapen life and discount deaths?

This rule completely ignores the environment, plants and animals. They don't vote, cannot have a voice and are thus ignored completely. Children don't vote and neither to seven future generations of children. They are also voiceless, so their lives can be discounted to NOTHING, along with animals, plants and birds. Total Value; NOTHING. ZERO, ZILCH.

Along with the other rule petition by SARI members to raise radiation limits orders of magnitude higher, this rule should ensure unlimited radioactive poisoning of the most vulnerable populations globally, with no consequences and no financial accountability.

SARI Wants NRC To Raise Civilian Radiation Limits To 500% More Than Radiation Workers Are Limited To, Using Quack Hormesis Theory, Via Mark Miller, Ed Calabrese, Carol Marcus  
<http://agreenroad.blogspot.com/2015/07/nrc-being-asked-to-raise-civilian.html>