

**From:** [McGee, Benjamin](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Comment re: Docket ID NRC-2015-0057  
**Date:** Wednesday, August 17, 2016 8:42:07 PM

---

NRC/To Whom it May Concern:

Regarding Docket ID NRC-2015-0057, I would like to submit the following comment, below. I understand that this comment is being submitted well after the conclusion of the comment period, but based on the potential importance of any subsequent decision regarding the proposed amendment, I hope my comment will be considered if it is practical to do so:

As a career geologist, environmental scientist, radiation safety officer, alpha/gamma spectroscopist, and commercial spacecraft radiation shielding design specialist, I strongly encourage adoption of the changes recommended in the referenced petition. The state of knowledge reveals that the balance of research has long been shifting away from the LNT model as representative of physical reality. In addition to the points raised by the petitioners, consider that because trace radioactive material is ubiquitous (geological) in nature, the LNT and ALARA philosophies have needlessly driven environmental action levels below those found in nature in many exterior locales (particularly in terms of uranium and daughter products, e.g., ANSI/HPS N13.12-2013). In other words, remediation criteria have been driven to the point of absurdity at great expense to the taxpayer. The self-imposed nature of the situation in this case is particularly nonsensical considering that no negative health effects associated with exposure to radionuclides at these environmental concentrations have been demonstrated, i.e., it is completely philosophical in nature and not grounded in practical science or epidemiology. The burden for the resulting expensive monitoring and clean-up of government facilities has been transferred to the taxpayer, which could and should be alleviated by changing regulations to reflect a more modern understanding of dose-effect relationships. Please, let reason and knowledge guide policy, not politics, fear, or an apparent aversion to disrupting the status-quo that has in my opinion been allowed to dominate the conversation for far too long. Thank you for your time and consideration.

Respectfully,

**Ben W. McGee**

**Senior Scientist**

Radiological Engineering  
[National Security Technologies \(NSTec\)](#)  
*A Contractor to the U.S. Department of Energy*  
Nevada National Security Site  
Office Phone: 702-295-4248

\*\*\*NOTICE: This email and any attachments may contain privacy act information. If you receive this message in error or are not the intended recipient, you should destroy the email message and any attachments or copies, and you are prohibited from retaining, distributing, disclosing, or using any information contained herein.\*\*\*

