

Re: SECY-12-0110

I am submitting the following comments with regard to the above referenced SECY report.

The Fukushima Daiichi triple core-melt and triple hydrogen explosions accident, as the worst accident in the 55-yr history of commercial nuclear power, by all means provides a justification for a re-evaluation of the NRC's regulatory framework regarding economic consequences of nuclear accidents. In doing so this writer urges the Commission to take into account that magnitude of off-site economic consequences for both the Fukushima and Chernobyl accidents have been grossly elevated by the actions of Japanese and Former Soviet Union authorities forcing evacuation of local residents. In doing so they chose to ignore state-of-the-art in the science of radiation safety. Of course this is much more so in case of Fukushima than Chernobyl, given the 25 year differential between the two accidents.

Prof. Wade Allison in his remarkable book *Radiation and Reason: The Impact of Science on a Culture of Fear* concludes that "Risks to health associated with ionizing radiation have been overestimated by a wide margin. " He has arrived at this conclusion by merging century-old clinical experience of radiotherapy, the current knowledge of radiobiology and analysis of long-term health records of large populations of people exposed to radiation, either as an acute dose or a chronic one, i.e. 86,955 Hiroshima/Nagasaki survivor data and the UNSCEAR Chernobyl studies. The outcome is Prof. Allison's recommendation for new safety levels for human radiation exposures: 100 mSv in a single dose; 100 mSv in total in any month; 5,000 mSv as a total whole-of-life exposure. His recommendation should receive due consideration at the NRC.

The forced evacuations cannot be justified on cost/benefit considerations. The costs are huge and the benefits minor if any. Japan's Reconstruction Agency has reviewed the human toll associated with the Fukushima forced evacuation. "The stresses of personal involvement in the evacuation, management and clean-up have emerged as the biggest factors in ill health for the people affected. The mental or physical burden of the forced move from their homes was the cause of 34 deaths, almost all elderly....The death toll directly due to the nuclear accident or radiation remains zero, but stress and disruption due to the continuing evacuation remains high." In case of Chernobyl most serious effects were not caused by radiation but by fear of it. Severe social and economic stresses included suicides, depressions, alcoholism, family dislocations, broken livelihoods, etc.

Prof. Allison, in his testimony before the British House of Commons, has asserted that Fukushima accident has resulted in no acute fatalities, no acute injuries, no extended hospitalizations due to radiation, and unlikely cancer fatalities in 50 years. The WHO preliminary report has showed low dose rates and concluded that most people in the Fukushima Prefecture would have received a dose between 1 and 10 mSv during the first year after the accident. Researches from the Hirosaki University have evaluated maximum exposures of 33 mSv for adults and 23 mSv for those less than 20 years of age. From this information, it can be concluded that the benefits to those who evacuated probably cannot be quantified. The radiation standard of 20mSv/yr used by the Japanese authorities is 10,000 times lower than the monthly dose to Japanese radiotherapy patients.

The local resident protection from released radioactivity, even as large as that from the Fukushima accident, should be viewed as sufficient simply by ordering residents to stay indoors, distributing potassium- iodide pills and a ban on drinking milk contaminated with I-131.

Respectfully,

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Several Fukushima articles published in Japan, 10 presentations delivered in the San Diego County