

**PRM-51-11
(71FR67072)**DOCKETED
USNRC

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Date: Mon, Jan 22, 2007 10:13 PM
Subject: Docket No. PRM-51-11 Comments

January 23, 2007 (4:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The below Comments are specifically submitted for PRM-51-11 (Petition for rule making.)

Dear NRC:

For too long, corporate profits have been placed ahead of human health, safety, and our environment in the host communities. Instead of fairly being on the side of caution, the NRC time and again has lowered the safety standards, increasing the health risks associated with playing host to aging, brittle reactors held together with a patch work of welds and patches as they move into their old age. It is, simply stated, a recipe for disaster for 103 communities here in America who are wrongfully be forced to host these reactors with inadequate protections in place for our health, for our environments, for our communities. For this reason, I/we support the petitioner's request for rule making generally, and specifically as more fully outlined below.

1. Averaging in risk assessment falls far short of protecting our most vulnerable members of society, specifically, our youngest, oldest and those with disabilities. Inadequate protections for these AT RISK groups not only amounts to environmental/health racism, but more important violates many statutes found within the American's With Disability Act. All citizens must be protected EQUAL PROTECTION under the laws and statutes of America, and standards that place them at a higher risk than other Americans shows a prejudice against them, and places them in an unfairly precarious position due to their ailments, or disabilities. For this reason, this commenter encourages the NRC not only to exercise caution in their standards, but to base their standards on numerical studies that would place our most vulnerable citizens in a position of having no higher risks than the average American citizen would face.

2. The NRC's current standards additionally create far more health risks for women exposed to radioactive emitters of all types than are men. In short, overly generous exposure standards geared towards the average male see women paying a huge price when living in a community affected by the emissions of a nuclear reactor. As example, I cite BEIR VII:

the cancer mortality risks for females are 37.5 percent higher. The risks for all solid tumors, like lung, breast, and kidney, liver, and other solid tumors added together are almost 50 percent greater for women than men, though there are a few specific cancers, including leukemia, for which the risk estimates for men are higher."

3. More frightening, the BEIR Reports that risks for children is far greater than the risk for both men and women. Though it might be convenient for both the nuclear industry and the NRC to ignore these elevated cancer risks for our youngest citizens, these citizens have rights, and should have their health protected in the same manner and fashion as adults do. In short, averaging has not, nor will it work. Standards based on averages, standards established to protect average adults are abominable. You are saying that the children in a host community are EXPENDABLE, that their lives are NOT IMPORTANT in the big scheme of our nation's desire to see a rebirth of the nuclear industry. Perhaps many members of the Commission would think differently if their

Template = SECY-067

SECY-02

new grandson or granddaughter were struck down from a cancer known to be caused by a nuclear reactor. [_http://www.ieer.org/comments/beir/beir7pressrel.html_](http://www.ieer.org/comments/beir/beir7pressrel.html)
(<http://www.ieer.org/comments/beir/beir7pressrel.html>)

4. Acceptable limits are NOT SAFE LIMITS (No Immediate Danger-now out of print) Allowable limits are not safe, and further, inadequate studies have been done on the cumulative effects of these allowable risks, especially as relates to the children. Allowable standards are not conservative, and are based upon a sexist and outmoded standard of the STANDARD MAN. Nancy Pelosi may have broken through the marble ceiling, but the NRC insists are treating women and their health and safety in a second class fashion.

5. Currently established standards fail to address inhaled and/or ingested alpha and beta emitters. The entire world now knows how little polonium-210 it takes to kill someone. The IAEA and the NRC have failed to include these pathways in their modeling. In short, even small releases could be potentially fatal for several hundred if not several thousand people, let alone the effects of a median or significant off site event.

The time has come for the NRC to protect all members of the public from all types of excess radiation exposure from nuclear power and its fuel cycle, gamma, alpha, beta, neutron, particulate, fission products, noble gases, instead of only protecting those members of the public that fit into the category of STANDARD MAN. Further, the time as come that measurement and monitoring includes all forms and pathways, not just gamma at the fence line. Stopping the measurements at the fence line fails to factor in such things as accidental releases, and emissions that are allowable under various rules and regulations. As one example, what would be the health effects and exposures risks to a child swimming just down stream from Indian Points nuclear reactors, especially is and accidental release occurred? What would the effects be to a child who caught and ate one of the fish that were found to contain extremely elevated amounts of strontium-90?

As communities are faced with an unwanted responsibility of hosting a fleet of aging and decrepit reactors, safety standards should be tightened, not relaxed. It's commonsense. Brittling of the reactors, bursting steam pipes, failing seals at the bottom of the reactors all point to failing reactors that require and ever greater amount of both maintenance and care. Lowering standards, ignoring antiquated , sexist, standards that place our most vulnerable citizens at risk is not only unfair, it's violating the Americans with disability rights act, it's violating the basic premise of America wherein in there is supposed to be equality and justice for all.

Respectfully Submitted,

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Mail Envelope Properties (45B57D2C.294 : 13 : 21140)

Subject: Docket No. PRM-51-11 Comments
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From: <RoycePenstinger@aol.com>

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