

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

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USNRC

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**From:** Phoebe Mills <phoebemills@yahoo.com>  
**To:** <SECY@nrc.gov>  
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**Subject:** Docket No. PRM-51-11

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Please follow the precautionary principle in regulating radiation emitted by nuclear power plants. In other words, please exercise precaution by accounting for more vulnerable populations in your standards. Since no level of radiation dose is safe, the best precaution would be no exposure. However, that is unrealistic since radiation is part of so many aspects of our lives. Thus, exposure levels recognizing vulnerable populations is a start.

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Please recognize the fact that the current "allowable" levels are not safe. Such "allowable" levels of radionuclides are NOT conservative or protective enough. They are based only on the obsolete "standard man", a healthy, white male in the prime of life. As a result, it ignores the more vulnerable fetus, growing infant and child, the aged, those in poor health, and women all of whom are more vulnerable than the "standard man" to the harmful effects of ionizing radiation.

Please consider radiation damage from inhaling or ingesting radionuclides. The NRC does not consider the effects of internal radiation from ingested or inhaled alpha and beta emitters. The amount of polonium-210 that recently killed a former Russian intelligence officer was considered by IAEA and NRC to be of the lowest possible risk because they failed to account for internal radiation damage.

The NRC must 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, etc. Measurement and monitoring should include all forms and pathways, not just gamma at the fence line. The NRC's radiation limits should include accidental releases as well as planned emissions.

Than you for your consideration,  
Phoebe Mills  
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SECY-02

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TEXT.htm	2375	
Mime.822	6021	

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