

PRM-51-11
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From: Bruce Drew <bdrew@igc.org>
To: <SECY@nrc.gov>
Date: Sun, Feb 4, 2007 8:14 PM
Subject: Rulemaking Petition No. PRM-51-11

DOCKETED
USNRC

Secretary,
U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001,
ATTN: Rulemakings and Adjudications Staff.

February 5, 2007 (10:40am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

RE: Comment on Rulemaking Petition Docket # PRM-51-11

From:
The North American Water Office
Lake Elmo, Minnesota

The North American Water Office respectfully requests that the Nuclear Regulatory Commission grant the subject petition and immediately initiate the requested rulemaking. The issuance of the BEIR VII Phase 2 report makes this petition is both timely and relevant.

Knowledge of the dangers of radioactive nuclides in the environment has advanced greatly since the current rules were promulgated and much of this advance is included in the recent BEIR VII report.

Current tolerance levels are based on a so called "standard man" which represents a stratum of the population which is known to be most resistant to damage from environmental radioactivity. This guarantees that the levels will be inadequate to protect the health of the more vulnerable strata, such as fetuses in the womb, infants, children, women, infirm individuals and the elderly. In fact, in order to promulgate a truly conservative standard a new-born girl would be a better standard. Such a standard would lead to truly conservative levels of tolerance. The BEIR VII Phase 2 report presents ample evidence that this is so.

An additional deficiency in the current standards is that they take no notice of the fact that ingested radioactivity can have serious, long term and even fatal, health effects. Although gamma radiation is the only emission that need be considered when dealing with external sources of radiation, because alpha and beta radiation cannot travel very far from the radioactive source, when these materials are inside the body they are in intimate contact with tissues and do not have to travel far in order to do damage. A number of radioactive nuclides tend to concentrate in certain organs and thus become more effective in causing damage. Examples are Strontium-90 which concentrates in the bones and Iodine-131 which migrates to the thyroid gland.

A further deficiency in the current standards lies in the fact that they consider only cancer. The NRC cannot claim fully to protect the public unless other debilitating effects, especially those due to ingested radioactivity are included.

Another area which needs attention is the measurement and tracking of emissions from power plants to determine where this radioactivity goes and who is at risk.

All-in-all the current regulations do a pretty poor job of protecting the public from the effects of radioactive emissions in the environment. Responding positively to this petition and revising the rules to correct the deficiencies noted above would be a step in the right direction.

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SECY-02

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