

PRM-51-11
(71FR67072)

From: "Sally Shaw" <acer8sac@comcast.net>
To: <SECY@nrc.gov>
Date: Tue, Feb 6, 2007 8:18 PM
Subject: PRM 51-11

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary, U. S. Nuclear Regulatory Commission
Attn: Rulemaking and Adjudications staff.
Re: PRM-51-11

Comments regarding the Biological Effects of Ionizing Radiation on the Determination of Relicensing:

Dear Sirs:

In regard to my petition for rulemaking, docket number PRM 51-11, please incorporate by reference the document found at the following web link : <http://www.ieer.org/sdafiles/14-4.pdf>.

If you read it in its entirety (and I hereby request that you do), you will find a good explanation of the history of radiation protection, the problem with averaging radiation risk over a large population, referencing it to standard man and ignoring the greater susceptibility of women, children, fetuses, fathers-to-be and those with weakened immune systems. It discusses how the deficiencies in current regulations can be remedied by updating the inputs to the ResRad models to reflect new knowledge and more conservative European exposure standards. With existing technology, reactor owners could contain more of the radiation they produce, which would have a linear beneficial effect on the exposed population. Given the LNT model of radiation effects confirmed in BEIR VII, NRC should require perfect containment to perfectly protect the public, or as near as humanly possible.

Thank you for your consideration of these comments.

Sally Shaw
Gill, MA

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SECY-02

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