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Potential Changes to Radiation Protection Regulations; Solicitation of Public Comment

**Comment On:** NRC-2009-0279-0037

Impact of Reduced Dose Limits on NRC Licensed Activities; Solicitation of Public Comment

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## General Comment

The NRC notice soliciting comment on this matter appears heavily weighted with bias toward requesting input suggesting that the economic interests of employers and industry should permit the continuation of occupational dose limits that are astronomical in magnitude and associated risk. The central question -- whether such massive cancer risk associated with radiation standards that have been unchanged since the 1950s despite tremendous increase in the official estimates of cancer per unit of risk is ethically appropriate -- is nowhere raised.

The current occupational radiation dose limit of 5 rem per year, plus more under certain circumstances, translates into a risk of cancer caused by such workplace exposure of 1 in 4 if a worker received the permissible dose each year over a 50 year working life and never went over the limit. In other words, a quarter of the workforce would get a cancer if exposed at the "permissible" limit.

That standard was established in the 1950s, and official risk estimates for cancer have increased 30 or 40-fold in that period, but the dose limit has not been reduced. Now NRC is reluctantly considering a tiny reduction, keeping the 5 rem/year limit but indicating averaged over a few years it should be no more than 2 years, with various exceptions. This remarkably tiny proposed reduction would still yield an associated cancer risk of about 1 in 10--every tenth worker receiving this permissible dose over a working career would get cancer from it.

It is hard to believe workers would agree to such employment were they truthfully informed of the official risk estimates associated with such dose. But the NRC notice soliciting comment does not disclose this, and instead requests comments that are a setup to push back against even this very limited change.

The occupational dose limits should at minimum be tightened 30-40-fold, to reflect the increase in cancer risk estimates since the original standards were established.

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