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General Comment

The NRC strategic plan safety goal is

"Strategic Goal: Ensure the safe use of radioactive materials.

For this goal, a successful outcome is one in which the Nation can continue to use radioactive

material for civilian purposes while preventing significant radiation exposures and significant

releases of radioactive material that may harm people or the environment."

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I recommend that the NRC strategy include developing a new, scientific, observed-evidence basis for the concepts of "safe" and "significant radiation exposures" and "significant releases of radioactive material". I recommend the concept of "may harm people and the environment" be replaced with "will harm people of the environment".

Regulations are now based on LNT (linear no-threshold theory) and ALARA (as low as reasonably achievable) policies. Although the National Academy of Sciences 2006 Biological Effects of Ionizing Radiation VII report endorses LNT, there has been ongoing controversy about LNT validity and considerable new research that contradicts LNT. ALARA is a corollary to LNT ALARA is based on "achievable" which is a function of technology, not of effects on health. Radiation detection technology can be very sensitive and is continually improving, tightening the restraints of ALARA. The word "reasonable" is vague so should not be a regulatory basis. ALARA creates high, unnecessary costs for all stages of the nuclear fuel cycle. Worse, ALARA creates the public fear of all radiation, impeding the benefits of nuclear power -- clean, affordable, safe, non-polluting electric power.

I recommend that the NRC strategic plan replace LNT and ALARA policies with new, scientific, evidence-based, quantitative bases for all NRC rules and regulations, and that all rules and regulations that now depend on LNT or ALARA, directly or indirectly, be replaced.