

## RulemakingComments Resource

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**From:** Cindy Folkers <cindy@beyondnuclear.org>  
**Sent:** Thursday, June 18, 2015 1:20 PM  
**To:** RulemakingComments Resource  
**Cc:** Julian, Emile; Sola, Clara; Giitter, Rebecca  
**Subject:** Text of letter to NRC RE: NRC Docket ID 2009-0279

**To:**

Emile L. Julian

Assistant for Rulemakings

And Adjudications

Office of the Secretary, NRC

Hello, Emile,

Here is the content of the petition letter sponsored by Beyond Nuclear. I will be making more detailed comments specifically for Beyond Nuclear on this ANPR by the Monday deadline. The text of this letter does not include any additional comments made by the petitioners.

Thank you,

Cindy @ Beyond Nuclear

**Nuclear Regulatory Commission (NRC)** NRC Docket ID 2009-0279

Protect the most vulnerable from radiation exposure

NRC is considering rewriting its radiation exposure regulations. Prenatal and childhood life stages are known to be particularly vulnerable to damage from radiation exposure with prenatal life stages being uniquely vulnerable. If you protect these life stages, you protect everyone.

NRC is proposing to align its exposure regulations with international standards, which would essentially leave out protection of pregnancy life stages by failing to specifically account for some unique vulnerabilities during this time.

Studies of childhood cancer risks indicate that none of the current or proposed exposure limits for the in utero life stage are protective enough. Right now, radiation is allowed to cause 1 fatal cancer in 286 people exposed. EPA risk goals protect to 1 in 10,000 risk for cancer incidence for other toxins. Setting a risk standard for radiation that causes so much more cancer than allowed by EPA makes radiation a privileged pollutant. This risk number does not include sensitive life cycles.

Background radiation is already responsible for a certain amount of childhood cancers. Therefore, NRC radiation exposure concepts like “As Low As Reasonably Achievable” (ALARA) will never be protective enough for prenatal life stages because any additional radiation exposure will present additional risk. Encouraging this risk favors industry profits over public health.

Cancer risk in just the exposed generation isn't the only risk radiation exposure poses. Additionally, non-DNA damage may be caused by radiation, but would be harder to attribute to radiation under current damage assumptions. Evidence for cross-generational damage exists in real life low-dose exposure scenarios.

Current NRC exposure standards fail to protect early human life stages. Any change in these standards needs to correct this failure.

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