

PUBLIC SUBMISSION

As of: 6/23/15 2:39 PM
Received: June 22, 2015
Status: Pending_Post
Tracking No. 1jz-8jkc-i5v1
Comments Due: June 22, 2015
Submission Type: Web

Docket: NRC-2009-0279
Potential Changes to Radiation Protection Regulations

Comment On: NRC-2009-0279-0098
Radiation Protection; Advance Notice of Proposed Rulemaking

Document: NRC-2009-0279-DRAFT-0137
Comment on FR Doc # 2015-06244

Submitter Information

Name: Mark Strauch

General Comment

I offer the attached comments on NRC20090279.

Attachments

NRC_radiation_protection_standards

**MARK STRAUCH
1680 SORRENTO PL.
LIVERMORE, CA 94550**

June 21, 2015

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

Reference: Docket ID NRC-2009-0279

I would like to offer the following comments on docket NRC-2009-0279.

Before proceeding to individual questions in the docket, I would like to make some general observations. Having worn a dosimeter for over thirty years, I have more than a passing interest in radiation and radiation safety.

- The Linear No-Threshold (LNT) view of radiation, and the accompanying As Low As Reasonable Achievable (ALARA) work process, are a failure. They have added enormous cost with marginal benefits to regulated entities. To the public, such views continue to feed unnecessary fears regarding radiation in our environment.
- In the preamble to the docket, the following was noted: (in reference to the SRM to SECY-08-0197) “Notably, the Commission agreed with both the NRC staff and the NRC’s Advisory Committee on Reactor Safeguards (ACRS) that “the current NRC regulatory framework continues to provide adequate protection of the health and safety of workers, the public, and the environment.” “ That suggests to me that the Commission should not further waste time and money on proposed changes to 10CFR20 without a substantial and compelling basis. I see neither.
- Alignment with international entities can be useful if such an alignment is justified on cost vs. benefit, and if the international entity has demonstrated competence in the subject matter at hand. Entities that continue to adhere to LNT, despite contrary evidence, do not demonstrate competence in my view. As such, I urge the Commission not to align itself with incompetent entities.
- A number of years ago, the Commission was on the verge of a more rational approach to radiation safety with its proposed “Below Regulatory Concern” effort. Unfortunately, emotion outweighed science and that effort was withdrawn. It is time to revisit that approach.

To the specific questions in the docket:

Q1-1: No comment. However I note that the term “total effective dose equivalent” has served us very well and see little reason to change it.

Q1-2: No comment.

Q1-3: As a user of computer models generally, I am reminded of the adage: "All models are wrong, however some are useful." If the model changes proposed provide enhanced fidelity in the calculations of effluent concentrations, great. On the other hand, if these proposed models merely polish the LNT bowling ball, please reject them.

Q1-4: Absent a compelling basis (and I see none), I would not reduce the 50 mrem standard.

Q2-1: No.

Q2-2: As noted in the docket, cataracts can be remedied with a relatively simple surgical procedure. This is substantially different than a radiation-induced cancer.

Q2-3 through Q2-7: No comment.

Q3-1 through Q3-5: No comment.

Q4-1 through Q4-8: No comment.

Q5-1 through Q5-3: Generally, metrification efforts should leave licensees the greatest flexibility possible in order to minimize their costs.

Q6-1: Reporting criteria should be limited to those activities most likely to bring a substantial fraction of workers towards their annual radiation limit.

Q6-2: No comment.

Q6-3: No.

Q6-4: No.

Q6-5: This is an ill-formed question, since it seeks an answer from an entity that may not be currently required to report such information.

Cumulative Effects of Regulation

My personal experience with the Federal Leviathan is that, in isolation, proposed rules and rule changes seem reasonable and modest. That, of course, ignores the cumulative effect as noted. Worse, a Federal regulating entity may not know, understand, or appreciate the other accumulating rules and regulations emanating from other Federal, State, and local entities. Given the size of the CFRs and Federal Register, it is clear the Federal bureaucracy needs to go on a diet. The Commission should set an example.

Mark Strauch