

PUBLIC SUBMISSION

As of: 6/26/15 3:18 PM Received: June 24, 2015 Status: Pending_Post Tracking No. 1jz-8jm2-x9hm Comments Due: September 08, 2015 Submission Type: Web

Docket: NRC-2015-0057

Linear No-Threshold Model and Standards for Protection Against Radiation

Comment On: NRC-2015-0057-0010

Linear No-Threshold Model and Standards for Protection Against Radiation; Notice of Docketing and Request for Comment

Document: NRC-2015-0057-DRAFT-0016

Comment on FR Doc # 2015-15441

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General Comment

The petitions make good sense where LNT is concerned. And ALARA.

A straightforward exposure standard ought to be set at a reasonably low risk level, as it is now for workers, and that is sufficient. Adding ALARA as a precautionary principle is conservative, true, but also very costly without demonstrated compensatory health benefit.

Where I disagree with the petitioners is public dose and the use of hormesis.

Public dose ought to be significantly lower than worker dose, 100 mrem/year perhaps (the exposure below which there are no documented health effects), for the obvious reason that members of the public are neither paid to work in an area of potential or actual exposure, nor are they monitored with periodic health screenings, as workers are.

Perhaps more importantly from an ethical perspective, not a health risk perspective, no entity has the right to subject an unwitting bystander to an exposure they are likely not aware of and have not agreed to. This

disagrees with the petitioners

hormesis argument: even if it may be good for them (the public) you still do not have the right to give it to them.

The evidence for a degree of hormesis, as evidenced by some petitioners, is strong, but it is still uncertain according to the

international bodies charged with evaluating that evidence, and hence would be difficult to turn into a blanket recommendation

for enhanced public exposure limits. Hormesis is best not mentioned in a rule except perhaps to cite the difficulty of its use

in setting public exposure guidance. However, setting public exposure limits at levels like 100 mrem/year, below which

there are no observed associated health effects, without also demanding ALARA, ought to satisfy the hormesis believers,

among whom I count myself.