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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

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General Comment

In radiation oncology, it is well established that the temporal distribution is of critical importance. Due to DNA repair mechanisms, the effect of radiation distributed over weeks or months is not the same as if it were given all at once. It seems probable that this also applies to low doses of radiation. Consequently, it is not valid to compare the natural background radiation received over the course of a year with, for example, a medical imaging X-ray or a nuclear accident.

The proposal to increase allowable public radiation doses to that of workers in the nuclear industry neglects the fact that the latter have made a voluntary choice of that profession and accompanying exposure to radiation, but the general public have not.