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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 addition to re-examining the use of LNT for radiation protection, the use of emergency guidance dose levels derived based on LNT need to be urgently re-examined in coordination with DHS and EPA. Since the issue of appropriate dose levels for emergencies was first taken up, the guidance has always been the benefit of the proposed action must outweigh the risks. Limits were not set because there was no method for estimating the ambient risk environment during an emergency. Using PAGs is equivalent to making a risk judgment before the event. There are methodologies that will allow the transition to actual health risk balances that can include the short and long-term health risks of evacuating a population and radiation dose in the risk balance. These methods allow a determination of whether the health benefits of an action outweigh the health risks. I would be happy to provide more information on the issue.