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Linear No-Threshold Model and Standards for Protection Against Radiation

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

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General Comment

While a linear non-threshold model is overly conservative, overly restrictive, and significantly increases costs in terms of money, manpower, and resources, I personally feel that modelling limitations and regulations on radiation hormesis is premature given that it has not been observed outside of laboratory settings or in humans.

I would instead consider changes to radiation limits based on a linear threshold model, which would likely result in similar changes to a basis in radiation homeostasis. Basing changes on a radiation hormesis model would call into question changes to the exposure limits if a lack of conclusive evidence for radiation hormesis in humans persists.

A threshold model for exposure limits has significant amounts of research upon which data analysis driven and difficult to dispute revisions can be based. Epidemiology data from the past 70 years is of such a scale that a case against a threshold model would have little to no evidence based validity.