

## RulemakingFormCEm Resource

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**From:** George Hutchinson [geothegreen47@gmail.com]  
**Sent:** Wednesday, June 17, 2015 6:15 PM  
**To:** RulemakingComments Resource  
**Subject:** Docket ID NRC-2009-0279

Dear Secretary,

Dear NRC Commissioners and Staff:

I understand that the NRC is considering changes that would create:

1. New radiation dose calculations for air and water. This is good news for us citizens if those dose calculations result in reduced radiation being released into our air and water. However, I also understand that the NRC has not yet calculated the amounts nor provided comparison with existing levels. Obviously, this is the first thing needed. It is important that you reduce the radioactive levels released to air and water. Allowable radiation levels must never be increased. Please stop all releases into sewage.

2. Greater protection for the fetus

Yes, please protect the most vulnerable—the reproductive phase of our life cycle. Set standards to protect infants and the embryo/fetus but allow even less exposure for pregnant workers than the current NRC proposal. The standards need to be established as if we are all in the vulnerable phase so all those who are will be protected.

I have observed that the NRC relies on expensive copyrighted reports to justify the proposed changes but refuses to make them all public. This is unacceptable and undemocratic. Make all reports used for federal rulemaking public.

I know that one of the biggest holes in radiation standards today is that they are based on an assumed dose to a “standard man” or “gender averaged adult.” For some types of exposure, females are significantly more harmed than males. Children are more harmed than adults and female children suffer the greatest harm—as much as double compared to male children. This is not the same as suffering a greater dose: this is a higher risk from the same dose. When “averaging” is invoked, it is insufficient to protect the weakest link in the chain of the human lifecycle; You must fully protect (referring to post-birth children)females age 0–5 years old.

The NRC’s old Radiation Standards, 10 CFR 20, allow too much radioactivity to be released from the nuclear power fuel chain, its uranium mills, fuel factories, waste dumps and processors. To protect us adequately you must reduce allowable radioactive releases, doses and risks.

The cancer risks from the current standards are too high, especially for women, children and babies. Please pay attention to the danger to our gene pool and reproductive phase of our lifecycle.

I wish to reiterate: 1. Reduce the legal radioactivity permitted to be released into air and water; never increase them again. Reduce the legal dose to members of the public (from 100 or more millirems/year to 1 or a few or, better yet: zero) from each nuclear power facility. NRC risk numbers show current levels could be causing 1 in 286 men, 1 in 190 women and 1 in 41 baby girls to die from cancer. Protect everyone to the level needed by the most vulnerable—don’t “average” by gender or age.

2) Stop the additional radioactive releases to sewage. Delete Table 3 of Appendix B of the current rule. On top of high risks from air and water emissions, NRC allows discharges into sewage that can give doses of 500 MORE millirems per year!

3) Protect the most vulnerable--I support reducing the allowable exposure during the reproductive phase of our life cycle. Set standards to protect infants and the embryo/fetus but reduce the legal exposure for pregnant workers and the embryo/fetus to less than the international recommendations (100 mr/remainder of pregnancy) and the public dose (100 mr/year). Less or no radiation at this part of our lifecycle will better protect all life-stages. Protect worker rights and privacy.

4) It's time to acknowledge radiation causes health problems other than cancer and protect against those as well: including heart disease, reduced immunity, mental retardation and more.

5) If you don't make the radiation rules stronger for us, our kids, our DNA and for nuclear workers, don't change them at all.

6) Don't refer to copyrighted documents. Release or rewrite the explanation for all changes so you can make them public. People should not have to pay hundreds of dollars to see what's being considered.

Thank you for your time and consideration.

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