

RulemakingFormCEm Resource

From: Michael Strawn [mjs55@juno.com]
Sent: Thursday, June 18, 2015 10:56 PM
To: RulemakingComments Resource
Subject: Docket ID NRC-2009-0279

Dear Secretary,

Dear NRC Commissioners and Staff:

NRC's 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. Reduce allowable radioactive releases, doses, and risks.

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

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 higher risk from the same dose. When "averaging" is invoked, it does not protect those who are most vulnerable to radiation, females age 0–5 years.

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.

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