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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

This sounds like an attempt for protection and proliferation of the nuclear industry without regard to public safety. Consider how FDA is constantly working to lower radiation doses from medical equipment and has instituted a comprehensive path to follow, as it is KNOWN that any exposure to carcinogens increases the risk of cancer. EPA knows this too.

Hormesis is how the industry would like radionuclides to be seen, but it is not the truth. Radionuclides are carcinogens and comprise some of the worst forms of carcinogens, as they mimic other chemicals the body uses. Health physics is run by the nuclear industry, with an inherent bias. Do not let the nuclear industry "validate" their emissions (and accidents) as "safe" when they are not, by adopting hormesis as if it were a valid fact. Hormesis is a theory without sufficient and/or controlled study. I urge you to continue with LNT and disallow the scope creep of public protection towards the "radiation is good for you" lie that nuclear apologists try to instill in the mindset of the world.

Adopting such a rule would have many ramifications. It would allow for further denial of cancers from events like Fukushima, Chernobyl, and TMI, atomic bomb testings, and clusters of cancers around nuclear plants. They would say, "see the NRC thinks these cancers are not from radiation, lost in the 'noise', because of hormesis". The industry would be "off the hook" on responsibility for health effects and safety controls and upgrades, with a regulation to support the denial of the health effects. I trust EPA scientists who set limits on drinking water, e.g. 3 pCi/L for I-131, as they are protecting the public from between 1 in 10,000 and 1 in one million additional cancers while balancing the cost to industry. If EPA was not taking into account the cost to industry, the level of radionuclides would be set at 0. EPA's approach is how it should be, and to allow the fallacy of hormesis to enter the CFRs would be an atrocity.

Also, please do not consider it just because the new norm in our world is low dose radiation, due to atomic bomb testing and major accidents like Fukushima which is still spilling its carcinogens around the world. It needs to be based on health effects, for which we now have a human study in progress due to Fukushima, and to negate that study with hormesis as the mindset is reprehensible.

And one can liken the low dose, constant exposure to radionuclides, particularly in the Northern Hemisphere, to EPA's 3 pCi/L of I-131 in drinking water which assumes a 70 year old man drinking 2L/water per day over a lifetime. We are getting consistent exposure, predominantly through airborne and ingestion pathways, which for some radionuclides exceeds the lifetime dose exposure that protects human health. Let's not tip the scales to protect the industry and their costs over human health, which is just as important as profits, if not more important.