

# PUBLIC SUBMISSION

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**Docket:** NRC-2015-0057

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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## Submitter Information

**Name:** Jerry Kurtz

**Address:**

2603 W. Klamath Avenue  
Kennewick, WA, 99336-2522

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## General Comment

While I agree the LNT model is over conservative, the assertion that the hormesis (beneficial) model should replace it is overly liberal. The public will never accept this regardless of the science. I think a better case could be made for more of a threshold approach. We have enough worker studies now to show significant doses have no affect on risk. I do support the reduction of ALARA but not the elimination. Eliminating ALARA requirements up to say 75% of limit would be fine. Most organizations would benefit from that with no increased risk. Beyond that, ALARA would need to be applied. Those organizations that would want to use the entire limit in their operations, would need to maintain ALARA in their operations. I do support increasing public dose limits. Substantial resources go into maintaining the public dose for no reduction in risk.