

RulemakingComments Resource

From: sydney bacchus <appliedenvirserve@gmail.com>
Sent: Wednesday, August 19, 2015 4:59 PM
To: RulemakingComments Resource
Subject: [External_Sender] Docket Nos. PRM-20-28, PRM-20-29, and PRM-20-30, NRC-2015-0057

Dear Secretary,

The NRC already fails to protect the environment that humans rely on for survival.

Therefore, the NRC should reject the three petitions for rulemaking cited in the subject line out of hand and instead, BAN ALL NEW NUKE FACILITIES.

The NRC should not have accepted those petitions for public comment in the first place, because those petitions are frivolous and based on unsound science.

The purpose of those three petitions is to weaken radiation protection standards by changing the NRC's regulations from the Linear No-Threshold (LNT) model endorsed by the National Academies of Sciences to a "hormesis" model.

The latter model is accepted by no one but a few pro-nuclear power fanatics and rather than recognizing that any dose of radiation exposure may be harmful, argues that low doses of radiation exposure may actually be beneficial. There is no scientific basis to support that.

The scientific research base shows that there is no threshold of exposure below which low levels of ionizing radiation can be demonstrated to be harmless or beneficial. This conclusion came from the latest study that NRC and other federal agencies commissioned NAS to carry out to update radiation risk information, so NRC should not be considering radical proposals that contradict its own update.

In conclusion, it is the US Environmental Protection Agency (EPA) that is charged with setting radiation protection of the public. Any changes to radiation regulations contemplated by the NRC should be in the direction of strengthening, not weakening them.

The most recent update of EPA's Blue Book (EPA 402-R-11-001, 2011), like the NRC's current standards (which are themselves too weak), continue to be based on the LNT model. Adoption by the NRC of the "hormesis" model would put the agency in direct and unnecessary conflict with the EPA on this critical underpinning of public health and safety regulation.

Clearly the NRC should act in opposition, based on significant research indicating that long-term exposure to low levels of radiation may carry a greater risk of harm than the LNT model presents. It is also well established that radiation causes other kinds of health damage in addition to cancer, but the regulations and risk studies ignore these, and thus are inadequate in that sense.

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