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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

On trial here appears to be the long-accepted LNT theory, in place for decades. As with all trials, should we not aim for proving 'beyond reasonable doubt' that the hormesis theory is valid and that the LNT is invalid? We see frequently mentioned that the studies do not prove low levels of radiation are detrimental to human health. Is this true? What shall we do with studies done by scientists who worked on the Manhattan Project who say otherwise? Karl Morgan, Dr. Arthur R. Tamplin with Livermore National Lab, Dr. John Gofman, Ernest Sternglass, Dr. Alice Stewart certainly appear to have demonstrated real effects of low-level radiation, and cumulative effects of same.

Will we ignore the military's cautions for their own troops? I am thinking particularly of such documents as ACE Directive 80-63, ACE Policy for Defensive Measures against Low Level Radiological Hazards during Military Operations, 2 AUG 96, AR 11-9, The Army Radiation Program, 28 MAY 99, FM 4-02.283, Treatment of Nuclear and Radiological Casualties, 20 DEC 01, JP 3-11, Joint Doctrine for Operations in NBC Environments, 11 JUL 00, NATO STANAG 2473, Command Guidance on Low Level Radiation Exposure in Military Operations, 3 MAY 0, USACHPPM TG 244, just to name a few.

All those appear to caution about either low-dose or bioaccumulative effects.

Do we toss out the several studies into fetal origin of disease which point to radiation exposure, among other things, in developing fetuses playing an important part in several unfortunate

problems, including malignancies, that appear in these children later in life? Environmental insults cause abnormal embryonic development appears to be the consensus of many who have done such studies.

To accept this hormesis theory, which is no less a theory than the LNT, we must throw out even the statements of the NRC and the Atomic Energy Commission's, and the EPA's and various radiological associations, and renown scientists the world over who have stated many times that there is no dose of radiation that can be ruled, without a shadow of a doubt, absolutely safe once inside a human system.

Where are the studies, preferably totally independent studies, which absolutely prove hormesis is a valid theory, that in this world of billions, not one human being will ever face cancer or birth defect or any negative effect of the lowest level of internal radiation?

Having been one of those dedicated students decades ago who merrily killed lab animals with very small doses of radiation, accumulated over time, of course, I would feel exonerated of those deaths if I knew they all perished happily, unaffected by exposure, and had benefitted instead from what we intentionally did.

European airline companies could cease warning their pilots and flight staff about the real possibilities of sterility. hazards to fetuses of pregnant onboard staff, and certain cancers due to long-term exposure of very low doses of "natural radiation" they acquire in-flight.

Would accepting this new theory mean we no longer will need to worry about the sun's effects on human skin, as in various skin cancers? No more cautions about that low-dose UV radiation? No more concern about cosmic rays?

No more worries about "low-level" radon causing lung cancer?

May we bring home souvenirs from those old uranium mines out west and safely keep a 'magic rock' on our bedside table?

'Beyond a doubt'...can the hormesis theory assure us of that?
If not, why not err on the side of safety, as we have all this time?

Why play Russian roulette?

I do wish very much that the NRC had better publicized these petitions so that more, millions more, American citizens could make comments here. SO FEW know this is even an issue. Of the 53 people I personally asked about this, two knew what I was talking about and several called me a liar, said the NRC would never consider this!
I have long wondered why the NRC does not make use of television and perhaps place a few invitations for comments during primetime viewing.

It would also be nice if ALL Americans could vote on this and other issues.
That would certainly ease the burdens placed on the NRC, who must decide for over 300 million humans who are counting on their protection, their wisdom in decision-making all these regulations.

Protection of all, there's something to think about.

