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Linear No-Threshold Model and Standards for Protection Against Radiation

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Linear No-Threshold Model and Standards for Protection Against Radiation; Notice of Docketing and Request for Comment

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General Comment

It is bizarre that a concept as ridiculous as the Linear Non-Threshold Theory of low-level radiation exposure health effects (LNT) has not only survived for decades, but has been allowed to drive risk assessment, safety regulations and operating procedures for several decades. It is long past time for NAS, AAAS, EPA and NRC to attack this issue on scientific and medical bases. The NRC is the key agency which deals most with radiation. NRC has more experience with regulation involving radiation, and should take the lead to resolve this matter.

The basis for the LNT is scientifically weak and always has been. It ignores the factor of time and allows no recognition of the recovery process, which is obvious in all living beings. The LNT has been used for political purposes and has been allowed to survive, not on the basis of new research but by activist efforts and political pressure.

I will not use this comment space to repeat the many valid points that NRC will receive on the science and history of the LNT issue.

Here is a story I have told in a hundred speeches. It is about a dozen New York lawyers: Each weekday night they meet in Grand Central Station at 5:20 to catch the commuter train for home. Each of them knocks down a double scotch. They visit on train and sip the drops left in the plastic cups. If nobody else showed up one evening and one lawyer drank all twelve doubles, he would die before the train reached Scarsdale. There is a broad basis of medical research that would

support that part of the story.

But if the "scotch LNT" approach were applied, it would predict that one of the lawyers would die every night. Bizarre! The LNT approach also allows a concept called "collective dose". This one is even more ridiculous! It adds up minimal radiation doses received by unrelated individuals to predict numbers of cancers in a population! Activists have made headlines out of these LNT-based concepts. And how about the ill-advised evacuations, many miles from Fukushima?

[When I was a senior in high school a bunch of us were drinking some beer on a front lawn one evening. One of the guys had a bottle of whiskey and kept sipping it. We told him to quit it and even tried to wrestle the bottle from him. He hid in the bushes till someone found him. He had passed out. We called the police. An ambulance rushed him to the hospital. He was pronounced dead later. That was real. No collective dose but a lot of scared guys. I think of him now and then.]

NRC should start proceedings as soon as possible to bring their regulations into the real world. That would require a model that does not add up infinitesimal doses of radiation for political purposes.

- - Dr. A. David Rossin