

*Sopris Environmental, LLC  
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August 20, 2015

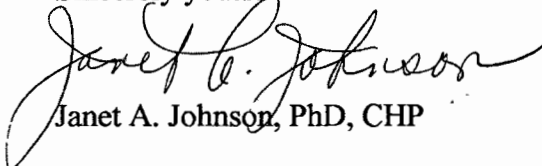
Secretary, U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

**SUBJECT: ALARA Comments in Support of Petitions - Docket Numbers PRM-20-28, PRM-20-29, and PRM-20-30 which request that the NRC amend its "Standards for Protection against Radiation" regulations and change the basis of those regulations from the Linear No-Threshold (LNT) model of radiation protection - Docket ID NRC-2015-0057**

Action must be taken to remove clause §20.1101(b) from Title 10 Code of Federal Regulations Part 20. This clause states, "The licensee shall use, to the extent practical, procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses and doses to members of the public that are as low as is reasonably achievable (ALARA)." It was good radiation protection practice when it was proposed in the 1970s as part of the three-pronged philosophy of radiation protection: justification, optimization, limitation. However, as a regulation, it has been misused and the term "reasonably" interpreted to mean "possibly" to the detriment of radiation protection of workers and the public. In addition, it implies a risk far in excess of what the current science supports. This misinterpretation has resulted in millions of dollars in unnecessary expenditures by government and industry in legal and reclamation costs that could have been better used to reduce real risks. In addition it has promoted an unnecessary fear of radiation to members of the public which is counter to public protection and, in too many instances, detrimental to individual health and safety to the extent even of costing lives.

The ALARA principle, while a worthy idea and supported by many of us in the radiation protection profession, has been distorted and is no longer a useful concept for inclusion in regulations. It should remain part of the philosophy of radiation protection and guide us in our practice but should be deleted as a regulatory requirement as it leads to unintended consequences detrimental to public and worker health and safety.

Sincerely yours,



Janet A. Johnson, PhD, CHP

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