

RulemakingForm3CEm Resource

From: Elaine Wilson [elaine1111@earthlink.net]
Sent: Wednesday, August 19, 2015 4:23 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 should reject the three petitions for rulemaking cited in the subject line out of hand. The agency should not even have accepted them for public comment in the first place, as they are frivolous and based on unsound science.

It is the US Environmental Protection Agency (EPA) that is charged with setting radiation protection of the public overall and its most recent update of the 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.

If anything, the NRC should move in the opposite direction, as significant research indicates 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.

The petitioners have done the nation a disservice by attempting to weaken these standards using a scientifically suspect model, and thus directing attention away from the real need to strengthen those standards, in particular to account for the reality that radiation is more harmful to children, especially girls, and to women than it is to men, and that the "standard man" approach used by the NRC allows for even greater exposure levels to those who are more vulnerable.

Any changes to radiation regulations contemplated by the NRC should be in the direction of strengthening, not weakening them.

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