

## **Rulemaking1CEm Resource**

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**Sent:** Monday, September 14, 2015 2:30 PM  
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**Subject:** Comment on PRM-20-28, PRM-20-29, and PRM-20-30  
**Attachments:** NRC-2015-0057-DRAFT-0222.pdf

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**Docket:** NRC-2015-0057

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

**Document:** NRC-2015-0057-DRAFT-0222

Comment on FR Doc # 2015-15441

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## Submitter Information

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## General Comment

I wish to comment about getting a perspective on the relative dangers of radiation in small doses which we know is proportional to how much radiation is being emitted. I happen to side with the hormesis believers who describe it as safe below a threshold and perhaps beneficial within a range above that safe area.

Times are getting critical. We need to find solutions to carbon emissions and nuclear plants are the only real high performance energy provider that can make a big enough difference to replacing the carbon emitting sources.

With a over 100 years worth of CO<sub>2</sub> (one trillion tons) waiting to enter the oceans we need to ask does being too careful sometimes interfere with getting on with life. The unspoken tragedy is a double tragedy. Climate change and ocean change. Before we experience the worst effects of climate change patterns the phytoplankton (a 40% drop since 1950) and pteropods are in serious decline from ocean acidification. These species are on their way to extinction. They are expected to rapidly decline to extinction in the next 20 years. When they go extinct that's a forever event that will cause a severe ecology imbalance with a significant chance of triggering a mass extinction.

That significant chance is much higher than the kind of chances we deal with regarding low level radiation.

The ocean has performed several useful functions over the last 100 years.

- 1) It has absorbed a great deal of our CO<sub>2</sub> becoming more acidic in the process. 30% more acidic than in 1950.
- 2) Ocean have prevented worse warming in the atmosphere. It has absorbed a a lot the heat, warming far faster than we realized explaining some of the lower than expected air and land temperatures.

Time is running out to be able to mitigate the backlog. The icecaps are melting, the glaciers receding, the hundred year storms are now ten year storms. The warning signs are telling us loud and clear that we have no time to waste regarding action.

Making nuclear power more affordable to build and manage can begin by easing the restrictions on radiation. We now know that coal emissions do far more damage than any nuclear power accident could ever do. We know reactors cannot detonate by the way they are designed with much lower fuel purity than a bombs fuel grade. We know that nobody dies or will even get sick as a result of accidents like Three Mile Island and the Fukushima accident.

The NRC deserves credit for achieving an amazing safety record. Let's reconsider what is reasonable because it has now come down to a do or die decision. Let's get on with the process of making nuclear energy affordable by rewarding it for its performance and remove the restrictions that are by comparison to coal and natural gas regulations quite punitive.