

Rulemaking1CEm Resource

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TITLE: Linear No-Threshold Model and Standards for Protection Against Radiation

COMMENT#: 561

From: J. nayer Hardin [mailto:jnayer@yahoo.com]
Sent: Friday, November 20, 2015 12:54 AM
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Subject: [External_Sender] Docket ID NRC-2015-0057 - Docket ID NRC-2015-005

Carol Gallagher

"On June 23, 2015, the NRC requested public comment on three PRMs, PRM-20-28, PRM-20-29, and PRM-20-30, requesting that the NRC amend its "Standards for Protection Against Radiation" regulations and change the basis of those regulations from the linear no-threshold model of radiation protection to the radiation hormesis model. The NRC is examining the issues raised in these PRMs to determine whether they should be considered in rulemaking."

'We've gotta change our way of thinking to survive in this nuclear age.' The way we are approaching our nuclear crisis, from the hospital to Fukushima is industrial age thinking in the information age. It's logic is flawed on many levels and based on chronic elevated nuclear radiation levels, should be placed in a history book, next to blood letting as a therapy, replaced by a computer with survival information in this, the nuclear age.

Why? "There is no such thing as safe nuclear energy." Dr. Helen Caldicott. Has radiation homeostasis been proven effective or are Dr. Caldicott and others correct?

It says in <http://radiationhormesis.com/RadiationHormesis/Radiation%20Safety.pdf>

"A single particle of radiation hitting a single DNA molecule in a single cell nucleus of the human body can initiate cancer." (page 11)

How do we know the data for medical exposure has not been doctored like what happened during at least the first year after Fukushima on industrial exposure?

From page 10:

"The 'Nuclear Shipyard Workers Study'80 (NSWS) was published in 1991, took place in from 1980-1988, and cost \$10 million dollars to perform by the School of Public Health at John Hopkins University, under contract of the US Department of Energy. It is the only study on radiation workers that has an age-matched and job-matched control groups. 11

Three groups were included: 27,872 'exposed' workers (>500mrem), 10,348 'minimally exposed' workers (<500mrem), and 32,510 'unexposed' controls (0rem). The 'exposed' workers death rate from cancer and all causes was four, and 16 standard deviations lower than the controls. "The probability of such a very low death rate from all causes being accidental is less than one in 10 million billion."11"

(page 15) "In summary, it is noted that over the last 100 years, the public's impression of the risks of medical x-rays has gone from "health benefits with insignificant risk", to "benefits must be weighed against risks". In the case of the Chiropractic profession, the situation is even worse; recently a subgroup of DACBRs have campaigned to attempt to force the profession to the position of only using x-rays when "Red Flags" are apparent in order to justify "benefits" over "potential" risk."

So how do we fix this? The same basic things I'm seeing for medical labs is true for Fukushima and other nuclear problems. I've done extensive research on solutions in general that, if you'd like, I can break down into situation specific applications. Forgive me but I'm 63 and accustomed to my government ignoring me.

Here's some recommendations:

Abide by old school nuclear alert levels, 49 c.p.m. or lower, based on clean data that folks can understand like we understand wind speed. If the current industry cannot guarantee abiding by the 'first do no harm' rule of medicine, it's time to consider alternatives.

We need to offer an English equivalent to not only the document but the language in general. For example, page 4:

"Remember, according to the EPA, a reasonable environmental radiation exposure per year might be something like 350 mrem (.35 rem).¹²³

According to NCRP Report 102, the safe annual dose for industrial exposure is 5 rem or 5000 mrem. 8"

What does that mean in cpm, counts per minutes of exposure? Geiger Counter cpm is easy to understand. Is there a tool where we can average based on patient, radiologist exposure to calculate where we've been so we can know when to lower exposure for the procedure or a lifetime / specific time in an area? What is the impact of full body clothing during radiation by technicians who are exposed long term?

Empower local and state governments to provide assistance by peace officers to evacuate or take other necessary precautions, if necessary.

Here's a few standards to consider for both indoor and outdoor radiation exposure.

1. Research & publish honest cancer / brain seizures from chronic and blasts of nuclear radiation exposure information. <http://www.slideshare.net/jnayerhardin/two-brain-seizures-in-az-in-six-months-is-usa-south-west-being-fried>

2. Do what is necessary to heal our nuclear crisis, i.e.

- natural cancer remedies
- nutritional fortification
- interior building radiation shielding using the 3D printing 'Contour Crafting' technique, by putting radiation reducing shells on the exterior of existing structures.
- Large scale phytoremediation in mushrooms, hemp, thistle and sunflowers
- Entombment, build ample radiation shielding from the room in the lab to the nuclear plant sarcophagus using 3d printing contour crafting technique in layers of hempcrete, lead, tungsten with a rounded edge hemp plastic exterior. Shielded big earth moving equipment and robots, maybe 3d printed on site, (can minimize human danger) for large scale projects.
- Invest & empower radiation shielding building materials & fabrics (especially as a filament for 3D printing fashions)

3. Research

- If there is a balance point between nuclear and magnetic or other energies
- How to identify and entomb existing nuclear waste like Nevada in October or upcoming West Lake Landfill fire and apply that knowledge to lab radiation
- How did the 8 Jesuit priests survive the WW II Japan nuclear blasts. Is there a managing energy in the color Black? (The priests has just finished saying mass so they would have all been in Black that morning). What about the power of long term non-distracted prayer?

Below are a few of the links with the supporting documentation and additional ideas on the topics presented. Though nuclear power specific, I suspect, could be wrong that nuclear radiation does damage regardless of delivery system.

Let me know what you think and if you'd like more information.

J. Nayer Hardin

Founder, Computer Underground Railroad Ent.

Using computers and other technology to help people be free - Established 1984

Use 3D printing's contour crafting technique to entomb sources of radiation, both plants and nuclear waste.

<http://hempnayer.blogspot.com/2015/02/hemp-and-4d-3d-printing-conversation.html>

Fix Fukushima Fast, Hemp & 3D Printing

http://hempnayer.blogspot.com/2015/04/fix-fukushima-fast-hemp-3d-printing_17.html

Help fix Fukushima and other gushing nuclear facilities

<http://hempnayer.blogspot.com/2013/10/how-to-fix-fukushima.html>

What Can help us balance Fukushima's radiation

<http://hempnayer.blogspot.com/2013/11/what-can-help-us-balance-fukushimas.html>

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