

PUBLIC SUBMISSION

SUNSI Review Complete
 Template = ADM-013
 E-RIDS=ADM-03
 ADD: Jazel Parks, Harriet
 Karagiannis

COMMENT (2)
 PUBLICATION DATE:
 7/26/2019
 CITATION 84 FR 36127

As of: 8/23/19 4:56 PM Received: August 23, 2019 Status: Pending_Post Tracking No. 1k3-9brt-ss9w Comments Due: August 26, 2019 Submission Type: Web
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Docket: NRC-2019-0154

Release of Patients Administered Radioactive Material

Comment On: NRC-2019-0154-0001

Release of Patients Administered Radioactive Material

Document: NRC-2019-0154-DRAFT-0003

Comment on FR Doc # 2019-15868

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General Comment

I am concerned that when nuclear regulations are presented to the public that the public gets the wrong impression about the meaning of these regulations. The science is clear what the risk are from exposure to ionizing radiation. The regulations should require not only the informing of the public that there is a risk but also a explanation of what these risk actually are in terms that anyone can understand. The application of the ALARA principle has been misunderstood by the public when it comes to safety and risk awareness. We give the public no sense of what reasonable means. Without an explanation of what is reasonable the public is left to guess and they almost always guess wrong about the risks of everything. They have been told for so long that radiation is dangerous without any qualifications that they believe that any level of exposure create a large risk even when the risks are actually small.

Simple statements such as those given by The Health Physics Society should be presented and explained as needed.

The Health Physics Society recommends against quantitative estimation of health risks below an individual dose of 5 rem in one year or a lifetime dose of 10 rem above that received from natural sources. There is substantial and convincing scientific evidence for health risks following high-dose exposures. However, below 510 rem (which includes occupational and environmental exposures), risks of health effects are either too small to be observed or are nonexistent. Health Physics Society Position Statement on Radiation Risk in Perspective. August 2004

Presenting a numerical explanation is very important. Patients should receive something like the following: The 5 mRem exposure limit set in the regulation presents an extremely low risk so that it is probably a

reasonable risk in most situations. The LNT would suggest that a 5 mrem exposure over a 75 year lifetime would increase the risk of developing cancer by 0.21%. An increase in lifetime risk of 0.21% relative to a lifetime risk of 42% for cancer in general is a small increase in risk. In the case of a single exposure of 5 mrem the risk is therefore probably undetectable in light so many other risks. A risk that is undetectable is probably a reasonable risk. The public has been given the impression that somehow the risk of ionizing radiation can never be reasonable but this example illustrate that the risks are probably much lower than the risks associated with not having the medical procedure done.

The risk to public health of inducing unnecessary fear about ionizing radiation into the public is exactly the as dangerous as the hyperbole associated with the risk of not being immunized for common diseases. The risk of not being immunized is in the noise yet since we dont help others to quantify risks, we allow those that would use fear to get attention to rule the public mind. We cannot allow government regulations to be misused to induce fear.