

## RulemakingComments Resource

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Regulation and nuclear power are concepts that stretch credulity in juxtaposition. Like the EPA, nuclear 'regulation' consists of empty words on paper, raising limits on radiation as effect rather than cause, as levels rise in the shared biosphere from continual releases from a number of sources. Examples abound; Fukushima hemorrhaging strontium laced water into the Pacific Ocean from triple meltdowns in direct contact with a flowing underground river. The explosive ejection from Fukushima Daiichi unit 3, polluting the atmosphere with thousands of pounds of plutonium. Forest fires in Chernobyl, recycling radionuclides that had been sequestered in the pine forests. Plutonium released for weeks when a drum of 'low level' plutonium waste ruptured, spewing for weeks because the 'private contractor' had no spare filter, no protective suits for its workers to contain the problem and no training in the use of such protective gear. WIPP, 2014, near Carlsbad, New Mexico.

Regulation has had no protective and timely effect on any of these sources of radioactivity.

More to the point, the specific isotopes and levels of these ongoing releases are not accounted for in petitioners request, let alone disclosure at any time by any regulatory agency. Neither the fact of a release (Fukushima) in a timely manner, nor the actual data, instead vague terms like low level, trace or "no immediate danger".

Nor did any federal agency, constitutionally mandated to protect and serve, issue so much as a basic Radiation Disaster 101 warning, like, hey take some KI for a while and stay out of the rain. Total silence.

And some would raise allowable levels still more?

If such a petition were required to provide an Environmental Impact Report ( and why should it not?) petitioner would be compelled to quantify the types and levels of radionuclides from the sources I've mentioned, and all others, so a meaningful conclusion could be drawn as to whether an additional amount requested by petitioner would cause harm.

Have you/ they done such calculations? Where are those numbers?

As to radionuclide releases from US reactors: they are continuous. Particularly refueling. It's becoming more apparent to more and more people how the scheme works: NPP operators disclose to NRC how much is released in a year on the Effluent Release Report. That number is divided by 365 to arrive at a number that is 'in compliance'; 'regulated'. It's magic. How it really works is that the lion's share is released during refueling at one event comprising two or three days. That dose cannot possibly be considered low level. Epidemiological data, clearly showing cancer clusters downwind of NPPs leave a trail a child could follow. No PhDs required.

A simple glaring hole in the grand plan, really. You have a supposedly robust and redundant level of multiple containments that must at time of refueling be thrown wide open.

As you consider the changes requested by petitioner, do acknowledge, at least to yourselves, that you already know what I say is true, and that in a short time more will know. As awareness grows so will Geiger counter literacy, there will be no more hiding behind white lab coats and vaunted degrees in physics. It's not difficult to understand : daily operations and the inevitable accidents with nuclear power plants is death. Why would you loosen the regulations to create more death?

Again, as awareness grows, so will anger. in the near future, the perception of your loosening of standards may be seen as a criminal act tread lightly. As Gofman said: "... If you pollute when you do know there is no safe

dose with respect to causing extra cases of deadly cancers or heritable effects, you are committing premeditated random murder."

– John W. Gofman, Ph.D., M.D. Comments on a Petition for Rulemaking to the Nuclear Regulatory Commission, May 21, 1994.”

Now, as to the petitioner that requested ALARA be replaced by the doctrine of 'hormesis'.

Hormesis is a bizarre cult-like belief adhered to by very few, and unsupported by credible studies, mostly supported only by anecdote. The petitioners question is quite chilling: "Why should the public be deprived of the benefits of low-dose radiation?"

This is the type of outlook one could expect from, say, the Third Reich. Yes petitioner is an MD, but so was Menegle. Paternal, hubristic delusions forced on an uninformed, non-consenting public

The question becomes: where then, does one draw the line? Do we next, as the doctors with the Manhattan Project did, inject plutonium into pregnant women? Is there much difference between ingesting it that way or breathing more of it with looser regulations? Either way, putting more radionuclides into people's bodies without knowledge or consent is rape, and later, murder.

Put that request to enshrine the delusional belief in hormesis back where it belongs.

The end game of nuclear power is death. We are approaching everyday levels of contamination that can no longer be described as 'low'. Do not add to that as this desperate ploy from the nuclear power industry requests.

P.S. No radiophobia here. The term radiophobia in itself is ridiculous, it is a self-serving propaganda ploy of the nuclear power industry

I am not afraid. I am angered and disgusted by the misery and death caused directly by 70 years of nuclear poison. 70 years is a long enough to fail. End it now. SMRs are a dangerous proliferative pipe dream.

Peace unto you, the Earth Our Mother, and all her Children. We're going to need Peace in this, the Age of Fallout.