NIRS et al Comments on NCRP SC 5-1 Draft Report, "Decision Making for Late-Phase Recovery from Nuclear or Radiological Incidents."

To be Filed April 15, 2013 by the undersigned organizations

The National Council on Radiation Protection and Measurements (NCRP) has proposed a dramatic weakening of radiation protection standards for responding to a radiological release. NCRP--an organization dominated by industry and government interests that have long pushed for weak public protections--has published for public comment a draft report "Approach to Optimizing Decision Making for Late-Phase Recovery from Nuclear or Radiological Terrorism Incidents" with an intent that federal agencies use it for determining how much radiation the public should be allowed to be exposed to before implementing cleanup. We find it profoundly unethical and oppose it.

The NCRP breathtakingly proposes permitting exposures of up to 2000 millirems per year for the long-term after a radiological release, with no cleanup to reduce this level required. 2000 millirems per year for lifetime exposure would result, according to the National Academy of Sciences and EPA, in one out of every six people exposed getting a cancer from that radiation exposure, above and beyond their normal cancer risk. Even the lowest end of the cleanup range the NCRP is proposing, 100 mrem/yr, would result in one in every 123 people exposed getting cancer from their exposure. These highly unethical proposals entail permitting radiation exposures orders of magnitude outside EPA's longstanding "acceptable" cancer risk of one in a million to one in ten thousand lifetime cancer risk, historically applied even for the most contaminated sites in the country.

Furthermore, NCRP is proposing extremely lax methods for calculating those doses from radionuclide concentrations in soil and other environmental media. For example, the recommended "permissible" soil concentrations would allow strontium-90 concentrations up to hundreds of thousands of times higher than EPA's cleanup goals for the nation's most contaminated sites, and thousands of times higher than the upper limit EPA permits, employed even at Superfund sites (e.g. Hanford) are as large as whole states.

We note with dismay that NCRP chose to questionably alter the purpose of this report, which was limited in its arrangement with the Department of Homeland Security to proposing responses to a nuclear weapons or dirty bomb explosion, expanding it now to supposedly cover any radiological release, including nuclear power plant accidents and any other problem such as even a transportation accident. Trying to expand standards intended for terrorist events such as detonation of a nuclear bomb to now cover any problem the nuclear industry might have is quite inappropriate.

But at its core, NCRP is remarkably suggesting people after a nuclear power accident just get used to "the new normal," essentially "suck it up" and accept these huge radiation doses and cancer risks, rather than government taking responsibility for protecting them from such exposures. In part, the NCRP report essentially admits that nuclear power is so dangerous that it could contaminate vast areas with extraordinarily high radiation levels, but rather than protect

people is proposing that government just let people be exposed to those massive carcinogenic risks.

In some sense not intended by NCRP, however, what the body has done is profoundly important--demonstrating that nuclear power is so extraordinarily dangerous that immense areas could be contaminated with so much radiation that one out of every six people in those vast damaged areas would get a cancer from the contamination, using the government's own official radiation cancer risk figures. But instead of taking one of either of the two morally defensible policy positions that follow therefrom--declaring nuclear power so dangerous that it is unacceptable, or insisting that contamination be cleaned up to risk levels that are in some fashion within a purportedly acceptable range for a civilized society--the NCRP aggressively pushes on behalf of this dangerous technology and recommends the government take no steps to protect the public even when they would otherwise be exposed to astronomical radiation doses and associated cancer risks.

It is important to note that vast majority of nuclear reactor sites, which NCRP allows would be very large sources of persistent radioactivity in an "event," are in areas of very high population. San Onofre, Turkey Point and Indian Point respectively risk millions of people in Los Angeles, Miami and New York City. When millions are exposed, tens or hundreds of thousands are very likely to suffer dire harm.

It is also important to note that risk calculations are not "one size fits all" as NCRP persists in asserting. Age, health, and gender all play significant parts in the level of potential harm that an individual may suffer. We urge all bodies that advise regulators, and all regulators to acknowledge the significant difference over the entire lifecycle between males (more resistant, less harm from ionizing radiation) and females (50 -- 100% more likely to suffer cancer from exposure, depending on age of exposure, compared to males in the same group).

NCRP is widely viewed as a lobbying entity promoting nuclear power and weakened radiation standards. However, this particular draft report is so egregious in that intent that even NCRP should be ashamed of it. It is profoundly unethical to propose that large numbers of the public be forced to be exposed to radiation so high--the equivalent of a thousand chest X-rays every year they are alive, or 3 unnecessary X-rays every day from the moment of birth to the moment of death--without responsible authorities doing anything to protect them.

We oppose these immoral recommendations.