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

April 15, 2013
TO: The National Council on Radiation Protection and Measurements (NCRP)
From: Commenters listed below

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 1 out of every 6 people exposed getting a cancer from that radiation exposure, above and beyond their normal cancer risk. Even the lowest risk end of the cleanup range the NCRP is proposing, 100 mrem/yr, would result in 1 in every 123 people exposed getting cancer from their exposure. These highly unethical proposals entail permitting radiation exposures orders of magnitude outside EPA's long-standing "acceptable" cancer risk of 1 in a million to 1 in 10,000 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 some of which are very large (e.g. Hanford).

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 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 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 1 out of every 6 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.

Sincerely,

Daniel Hirsch
Committee to Bridge the Gap, California

Diane D’Arrigo, Mary Olson
Nuclear Information and Resource Service
North Carolina and Maryland

Catherine Thomasson, MD, Executive Director
Physicians for Social Responsibility
Washington, DC

Allison Fisher
Public Citizen, Washington, DC
John Coequyt, Susan Corbett
National Sierra Club

Kevin Kamps
Beyond Nuclear, Maryland

Kendra Ulrich
Friends of the Earth

Tim Seitz
Ontario Clean Air Alliance
Kingston, ON Canada

Angela Bischoff
Greenspiration, Canada

Marylia Kelley, Executive Director
Tri-Valley CAREs, Livermore, CA

Jacqueline Cabasso, Executive Director
Western States Legal Foundation
Oakland, CA

Greg Wingard, Executive Director
Waste Action Project, Seattle, WA

Nancy O'Byrne
Coordinator, Pax Christi Florida, St. Augustine, Florida

Gladys Schmitz, SSND, Board Member
Mankato Area Environmentalists
Mankato, MN

Mali Lightfoot
The Helen Caldicott Foundation
North Carolina, Australia

Dave Kraft
Nuclear Energy Information Service NEIS
Chicago, Illinois

Joseph Mangano MPH MBA, Ex. Dir.
Radiation and Public Health Project
Ocean City, NJ

Stephen Brittle
Don’t Waste Arizona, Inc.
Phoenix, AZ

Paul Gallay, President and Hudson Riverkeeper
Riverkeeper, Inc., Ossining, New York

Robin Lloyd
Women's International League for Peace and Freedom
Burlington, VT

Michael Welch
Redwood Alliance, Arcata, CA

Mary Beth Brangan, James Heddle
Ecological Options Network, Bolinas, California

Mike Carberry
Iowa City IA
Green State Solutions-Director
Friends of the Earth-Iowa Nuclear Campaign Coordinator
Sierra Club-Nuclear Free Campaign

Nora M. Nash, OSF
Sisters of St. Francis of Philadelphia
Aston, PA

Valerie Heinonen, o.s.u.
Ursuline Sisters of Tildonk, U.S. Province
New York, NY
Dominican Sisters of Hope, New York, NY
Mercy Investment Services, Inc., NY, NY

Sr. Kathleen Coll, SSJ
Shareholder Advocacy, Catholic Health East, Newtown Square, PA

Lou Zeller
Blue Ridge Environmental Defense League, North Carolina
Gene Stone  
Residents Organized For a Safe Environment (ROSE), San Clemente, CA

Gary Headrick  
San Clemente Green, San Clemente, CA

David Hartsough  
PEACEWORKERS, San Francisco, CA

Alicia Godsberg, Executive Director  
Peace Action, Peace Action Fund of New York State, NY

Mary Lampert, Heidi Mayo  
Pilgrim Watch, Duxbury MA

Sara Altherr  
Pilgrim Coalition, Kingston, MA

Joanna Kirkpatrick, PhD, member  
Snake River Alliance, Boise, Idaho

David Agnew, Coordinator  
Cape Downwinders, Harwich, MA

Buffalo Bruce  
Western Nebraska Resources Council  
Chadron, Nebraska

Margaret E. Sheehan, President  
Project for Energy Accountability  
Cambridge MA

Glenn Carroll  
Nuclear Watch South  
Atlanta, GA

Gwen Dubois, MD  
Clamshell Alliance  
Chesapeake PSR  
Maryland

Ken Bossong  
SUN DAY Campaign  
Takoma Park, MD

Kathleen Ferris  
Citizens to End Nuclear Dumping in TN  
Murfreesboro, TN

Daphne Wysham, Co-director  
Sustainable Energy & Economy Network  
Washington, DC.

Dr. Tom Neilson  
Citizens Awareness Network, Greenfield  
Concerned Citizens of Franklin County, Greenfield, MA

Sociology, New College of Florida, Sarasota, FL

Deb Katz  
Citizens Awareness Network  
Shelburne Falls, MA

Chris Williams  
Vermont Citizens Awareness Network

Tim Judson  
Central NY Citizens Awareness Network, Syracuse, NY

Roger Downs  
Atlantic Chapter Sierra Club, NYS

Lee Blackburn  
Ohio Sierra Club Nuclear Committee

Charles K. Johnson  
Oregon and Washington Chapters, Physicians for Social Responsibility  
Portland, OR and Seattle, WA

Ann Suellentrop M.S.R.N.  
Physicians for Social Responsibility, KC

Leah R. Karpen  
PSR and WILPF, Asheville, N.C.

Wells Eddleman, Staff Scientist  
NC Citizens Research Group, Durham NC
Christine Borello  
CCLT/ Uniontown IEL Superfund Site, Uniontown, Ohio

Donna Stein, Pres.; Edie Kantrowitz, VP  
New York City Friends of Clearwater  
New York, NY

Sandra Gavutis, Ex. Dir., Debbie Grinnell  
C-10 Foundation, Citizens Within a 10-Mile Radius of Seabrook  
Newburyport, MA

Julius Kerr  
Neighborhood Environment Watch, Alamance County, NC

Judith E. Fletcher  
MUSE (Musicians United to Save the Environment), Bronx, NY

Alice Hirt  
Don't Waste Michigan, Holland, MI

Jessie Pauline Collins  
Citizens Resistance at Fermi 2, Gore, OK

Michael J. Keegan  
Coalition for a Nuclear Free Great Lakes  
Monroe, MI

Ernest Fuller  
Concerned Citizens for SNEC Safety  
Six Mile Run, PA

Lillian Light  
Environmental Priorities Network, Manhattan Beach, California

Cara L. Campbell, Chair  
Ecology Party of Florida  
Ft. Lauderdale, FL

Barry J. White, President  
Citizens Allied for Safe Energy, Inc.  
Miami, FL

Nina Bell, J.D., Executive Director  
Northwest Environmental Advocates, Portland, OR

Lynn Sims  
Don't Waste Oregon, Portland, OR

Representative Gerry Pollet, JD, Ex Dir.  
Dick Saunders  
Heart of America Northwest  
"The Public's Voice for Hanford Clean-Up"  
Seattle, WA

Bonnie Urfer, John LaForge, Co-directors  
Nukewatch, Wisconsin

Alice Slater  
Abolition 2000, NY

Susan Shapiro  
Public Health and Sustainable Energy (PHASE), Spring Valley, New York

Dr. F. Taylor  
Hilton Head for Peace, Hilton Head  
SC

Jane Swanson  
San Luis Obispo Mothers for Peace, San Luis Obispo, CA

Nancy Burton  
Connecticut Coalition Against Millstone, Redding, Connecticut

Sharyn Cunningham, Co-chair  
Colorado Citizens Against Toxic Waste, Inc., Canon City, CO

Joseph Waldstein, Rebecca J. Chin  
Duxbury Nuclear Advisory Committee, Duxbury, MA

Gretel Johnston, Garry Morgan  
Bellefonte Efficiency & Sustainability Team/Mothers Against TN River Radiation  
Scottsboro, AL
Ed Smith, Safe Energy Director
Missouri Coalition for the Environment
St. Louis, Missouri

Sarah Barczak
Southern Alliance for Clean Energy,
Knoxville, TN

Greg Mello
Los Alamos Study Group
Albuquerque, NM

John Blair, president
Valley Watch, Inc., Evansville, IN

Conrad Miller, MD
Physicians for Life, Watermill, NY

Joy Joslyn MacNulty
Citizens Energy Council
Williamstown, MA

Paula Gotsch
GRAMMES, Brick, NJ

Terra Foundation
Linda Seeley, Executive Director
San Luis Obispo, CA

Barbara Warren
Citizens’ Environmental Coalition, NYS

Lewis Cuthbert, MD
Alliance For A Clean Environment,
Pottstown, PA

Maureen K. Headington
Stand Up/Save Lives Campaign
Burr Ridge, Il

Gretel Munroe
Grassroots Actions for Peace, International
Coalition to Ban Uranium Weapons
Medford, MA

Kathy Boser
Concerned Citizens of Cattaraugus County
NY

Marty Rajandran
Granny Peace Brigade
New York, New York

Gary Shaw
Croton CIP (Croton Close Indian Point),
Croton on Hudson, NY
IPSEC Leadership Council, Ossining, NY

Ted Thomas
Cape Cod National Seashore Advisory
Board, Wellfleet, MA

William S Linnell
Cheaper, Safer Power
Portland, Maine

Dooley Kiefer, legislator
Tompkins County, Ithaca, NY

Don Ogden, producer/co-host
The Enviro Show, WXOJ-LP, Florence, MA

Christopher LaForge
Great Northern Solar, Port Wing, WI

Hank Prensky
TakomaHomes.com, Takoma Park MD

Eric B. Decker, Senior Technical Staff
Pacific Wireless, Scotts Valley, CA

William W. Smith III, President
USA Nica Windpower, Inc., Jamestown, RI

Anita Lord
Lord Programs, Orleans, MA

Craig Fiels
Sustainable Economic Solutions
Oakland, CA
Individuals

Angela & Anthony Graziano
Massapequa Park, NY

John Barkhausen
Warren, Vermont

Milton Carrigan
concerned citizen on central coast of California
San Luis Obispo, CA

Rael Nidess, M.D.
Marshall, TX

Joan Cominos

Diana Nikkel
Soquel, CA

Suzette Shelmire

Dorli Rainey
Seattle, Washington

Meg Simonds
Bolinas, CA

Art Hanson, Natalie Hanson
Lansing, Michigan

Maitland Alexander
Moorpark, CA

Carolyn Demorest
Dublin, NH

Dane Spencer
Sarasota, FL

Ben McKelway
Plymouth, Massachusetts

Darla Bruno
Lebanon, NH

Jane Eaton Meiclejohn
Montpelier, VT

Ann L. Grewe
The Villages, Florida

Larry Powers
South Berwick, Maine

Sarah Edmonds, PhD
Licensed Psychologist
Prescott, AZ

Betty Walters
Boulder, Colorado

Pamela Johnston
Otto NC

Janette D. Sherman, MD
Virginia

Miles Hopkins
Redwood City, CA

Gerson T. Lesser, M.D.
Clinical Professor of Medicine
New York University School of Medicine

Lynn Howard Ehrle
Plymouth, MI