

November 10, 2015

EPA Teleconference with the Scientific Advisory Board Radiation Advisory Committee

Oral Comments given by Cindy Folkers:

I'm Cindy Folkers with Beyond Nuclear. I have an MS in environmental science from Johns Hopkins University. Thank you for the opportunity to provide comment to the Radiation Advisory Committee today.

I would like to impress upon the committee the need to ensure its membership always has experts in the area of in utero development and childhood impacts from environmental contamination, one of which is radiation from man---made and technologically enhanced sources.

In its comments to NRC on the hormesis petition for rulemaking, EPA recognized there is complex DNA *damage* that is *unique to radiation*. But EPA would also do well to recognize that certain human life stages are themselves uniquely *vulnerable* to damage from radioactivity and to protect them.

In fact, a childhood health study that might have exposed the impact of radioactivity was recently cancelled when the Nuclear Regulatory Commission failed to renew a contract with the National Academy of Sciences that would have investigated the impact of radioactive releases from facilities licensed by the NRC.

This is worrisome because it keeps the public around these facilities from knowing how these facilities affect their health. But it is also worrisome, because the EPA is undergoing a concerted push to address climate change through energy policy, and the nuclear industry claims that use of nuclear power is essential to this effort and is using its substantial resources to ensure its continued existence.

Yet studies of children in Europe show that even radiation at unavoidable background levels can elevate cancer risk. Clearly before we release even more radioactivity to our environment, we should have a better understanding of how badly we may have already damaged ourselves, both initially, and over the long term. We certainly do not have that understanding at this point.

So if the powers that be will not allow a US study examining childhood cancer risk around nuclear facilities, it is incumbent upon the Radiation Advisory Committee to have the necessary expertise representing the full range of current known or suspected health impacts to pregnancy outcomes and childhood wellness. Because, in fact, these current research findings are not only NOT adequately represented in most radiation committee frameworks, there appears to be no proper or informed mechanism for even examining this current knowledge.

Concepts like exposome assessment or biomarker measurements are wholly missing or resisted in favor of error--prone or unreliable methodologies like dose reconstruction. Adding researchers to the RAC who have expertise in these areas as well as in early life stage development would benefit the RAC and the EPA by broadening the scientific discourse and methodologies available to them. The public would benefit in turn.

Thank you for the opportunity to add these spoken comments to my written ones. I urge those of you who have not done so already, to read my comments submitted to the RAC earlier.