

This is Cindy Folkers with Beyond Nuclear. Thank you for the opportunity to comment today. EO 13777 is asking to "alleviate unnecessary regulatory burdens placed on the American people". For Americans, radioactivity from 19th and 20th Century energy sources remains a health burden and current regulations are not protective enough for women, children and pregnancy. Adult males are more resistant to radiation than adult females, who are less sensitive than male children who, in turn, are less sensitive than their female counterparts. That means for the same dose of radiation, women and children suffer more cancers than men.

More troubling, the data set on which this health information is based does not account for constant contamination of air and water that results from nuclear and coal technologies, or exposures resulting from inhalation or ingestion. These data also represent just cancer, and do not include non cancer impacts. Pregnancy, a uniquely vulnerable life stage, is not fully represented in these data and not fully protected by our current radiation standards. If EPA wants to streamline their regulations, they should modify them to protect the most vulnerable life stages – pregnancy and childhood – and get rid of more complicated, much less protective, exposure standards. EPA should assume that pregnancy is a constant state in the population and set any radiation standards to protect pregnancy.

Do EPA radiation protection standards place undue burden on the American people? For women, children and pregnancy, the answer is yes, because the exposure standards fail to protect them adequately. Just as important, we are at the precipice of energy decisions, which will change our environment and civilization as we know it. EPA needs to encourage efforts that inform the public of this increased, scientifically validated, health burden on women and early life stages. That way, the public and politicians can factor this information into decisions for our energy future and understand that using nuclear power to combat climate change means asking already overburdened women and children to continue to pay a higher health price.