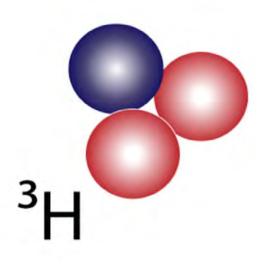




Dr. James Conca

Citizen's Advisory Panel Meeting

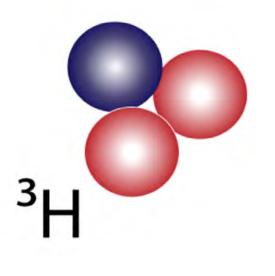
Trustee of the Herbert M. Parker Foundation Washington State University, Richland, WA https://tricities.wsu.edu/parkerfoundation/ https://www.forbes.com/sites/jamesconca Plymouth, MA September 2022



The Possibility of Discharging Tritiated Water into Cape Cod Bay

Holtec is evaluating discharging up to 1.1 million gallons of treated water, with residual tritium, from the shuttered Pilgrim Nuclear Station near Plymouth, Massachusetts into Cape Cod Bay

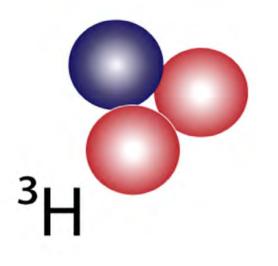
One scenario is mixing the water with 20x seawater and discharging slowly, no more than 40,000 gallons a day, as has been done routinely at nuclear power plants world-wide, including Pilgrim, with no adverse effects.



After 50 years of field and laboratory experiments, and environmental and biological monitoring, the scientific community has never observed any humans or organisms in the environment to have been harmed by ³H at any level from any source

Only ³H concentrated in laboratories, not even in nuclear reactors, can get ³H levels high enough to cause harm. In the lab, to see any health effects at all, we have to enrich materials, water or food in ³H almost a billion times above normal levels which takes large amounts of energy and advanced procedures. We then feed or inject it into an animal.

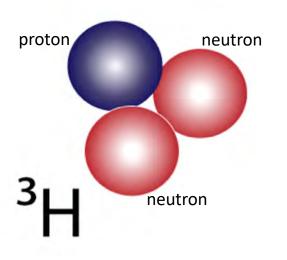
We do not need to do any more of these live animal tests.



Units and Numbers

Units of radioactivity: (doesn't involve the organism) Becquerel (Bq) – 1 nuclear disintegration per second Curie (Ci) – 37 billion Bq picoCurie (pCi) – 0.037 Bq

Units of dose: (involves the organism) Sievert (Sv) – dose equivalent (normalized to rad type & organ) rem - U.S. unit of dose equivalent (1 Sv = 100 rem) Gray (Gy) – absorbed dose = 1 J/kg (100 rad)



^{1,2,3}H has the most unique chemistry and physics of any element or radionuclide. That's why we don't remove it from this water.

Weakest radioactivity of any radionuclide – 6 keV average

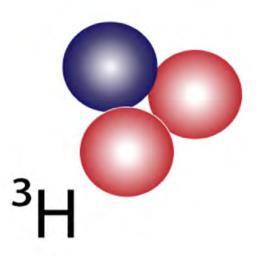
- Difficult for such a low-energy beta to get through the water, cell walls and other materials in between the radionuclide and any DNA, can't pass through dead skin layers. So only internal doses are possible.
- The energy mostly gets dispersed within the electron clouds of other molecules like H₂O through inelastic collisions and the Bremsstrahlung effect, turning kinetic energy into EM non-ionizing energy.
- ³H half-lives are short (important for dose)
 - Physical decay 1/2-life is just over 12 years
 - Biological ½-lives are in days
 - Humans, just under 10 days
 - Fish, just over 2 days

³H (HTO) thermodynamically prefers to be in water

- ³H does not concentrate up the food chain
- ³H dilutes up the food chain
- will not adversely affect the oysters, clams or fish in Cape Cod Bay

³H (OBT) also thermodynamically prefers to be in water, but

- slightly slower to leave tissues
- no documented observation of concentration up the food chain



Tritium in the Environment

Natural (cosmogenic) tritium concentrations in seawater are about 0.7 Bq/l (our blood contains 250 Bq/l of radionuclides, 99% of which are \geq 100 times more energetic than ³H.

Natural (cosmogenic) tritium is continuously created in the upper atmosphere, mostly by

 $^{14}N + n \rightarrow {}^{3}H + {}^{12}C$

^{1,2,3}H has the most unique chemistry and physics of any element or radionuclide. That's why we don't remove it from this water.

forming *70,000,000,000,000 Bq (70 QBq; 2 x 10⁶ Ci)* of ³H every year, which rains out into surface waters from which we end up drinking or fishing.

But there are 74,100,000,000,000,000,000,000 Bq (74 S_xBq) of K-40, Rb-87 and many more higher-energy emitters already in the world's oceans. Fish are swimming in lots of radioactive material anyway, more than this Pilgrim water could ever effect.

For those of you who wear glow-in-the-dark wristwatches, you are carrying 925,000,000 Bq of tritium on your wrist. Medical and industrial applications in the U.S. use 1.45 x 10¹⁷ Bq/year (145,000,000,000,000,000) @ \$30,000/gram



The Issue As It Stands

Since there have been no documented health effects from ³H levels outside of the laboratory, Nations have to guesstimate what maximum regulatory limits to set

Tritium Drinking Water Limits By Country

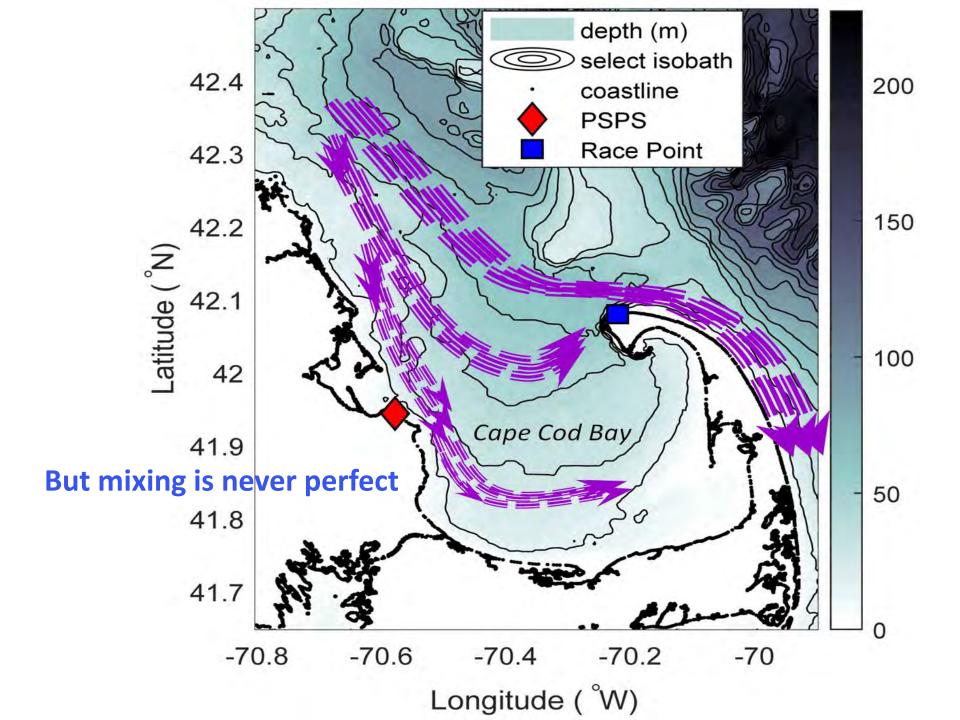
| <u>Country</u> | <u> Tritium Limit (Bq/</u> | liter) <u>(pCi/liter)</u> |
|------------------------|----------------------------|---------------------------|
| European Union | 100 | 2,700 |
| United States | 740 | 20,000 |
| Canada | 7,000 | 189,000 |
| Russia | 7,700 | 208,000 |
| Switzerland | 10,000 | 270,000 |
| World Health Organizat | tion 10,000 | 270,000 |
| Finland | 30,000 | 810,000 |
| Japan | 60,000 | 1,620,000 |
| Australia | 76,103 | 2,050,000 |



What Happens After the Tritium Enters the Water?

Any dissolved constituent or chemical species in any packet of water that is in a concentration higher than the surrounding water will begin dispersing, or spreading out, to reach equilibrium, or steady-state, in order to smooth out any concentration differences.

Currents and wave action are very efficient in dispersing dissolved chemical species, especially HTO that thermodynamically wants to stay in the water, becoming fairly well-mixed in days to weeks.



What is the effect of discharging all of the Pilgrim tritiated water into Cape Cod Bay?

But mixing is never perfect, so we can look at various degrees of mixing to see the effects:

| 100% mixed | → 1.90 X 10 ⁻⁸ μCi/ml | = 19.0 pCi/L | << 20,000 pCi/L |
|------------|----------------------------------|--------------|-----------------|
| 10% mixed | → 1.93 X 10 ⁻⁸ μCi/ml | = 19.3 pCi/L | << 20,000 pCi/L |
| 1% mixed | → 2.18 X 10 ⁻⁸ μCi/ml | = 21.8 pCi/L | << 20,000 pCi/L |
| 0.1% mixed | → 4.90 X 10 ⁻⁸ μCi/ml | = 49.0 pCi/L | << 20,000 pCi/L |

But discharge will be over time, no more than 40,000 gal/day, each packet dispersed in a few days to a few weeks before all of the water is discharged.

However, other radionuclides in seawater total about 350 pCi/L (13 Bq/l) mostly from K-40, Rb-87, U-238, Th-232 with much higher energies than tritium, giving Cape Cod Bay a total radioactivity of about

600,000,000,000,000 Bq from these others that, unlike tritium, can (15,000,000,000,000 pCi) theoretically concentrate up the food chain, but never do to any significant degree 10

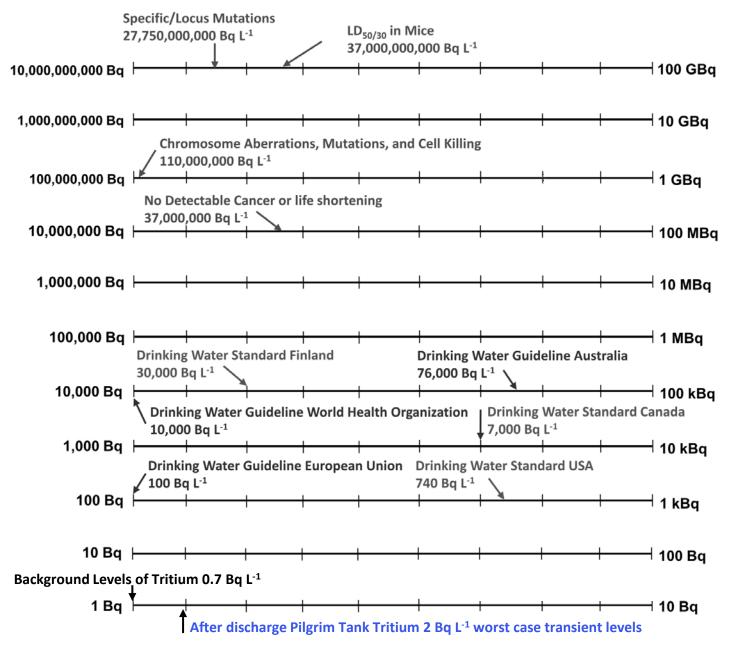
What Happens After the Tritium Enters the Water?

So at some point, the tritium will be fairly mixed in Cape Cod Bay at somewhere less than the worst case - 1.8 Bq/L = 49 pCi/L

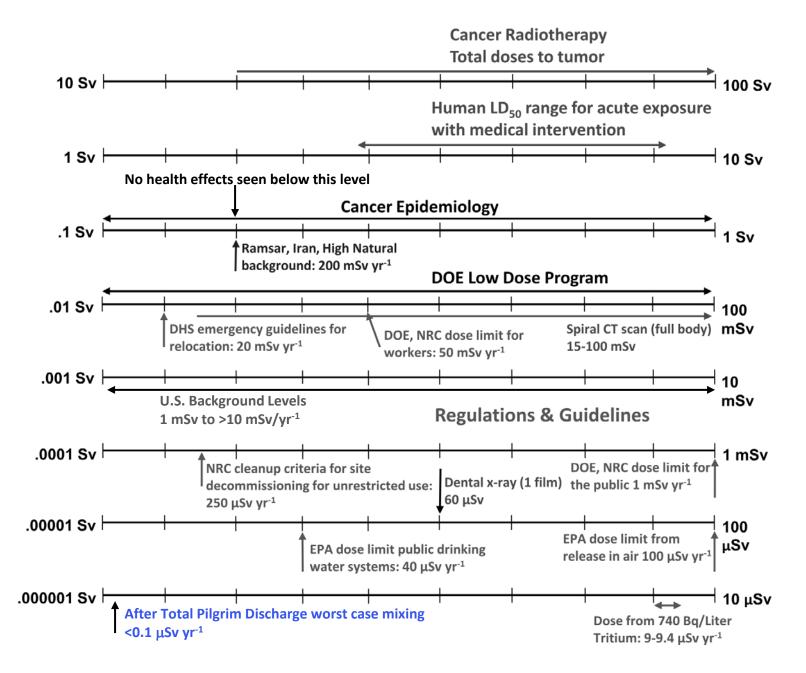
Tritium Drinking Water Limits By Country

| <u>Country</u> | Tritium Limit (Bq/lite | er) <u>(pCi/liter)</u> |
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| Finland | 30,000 | 810,000 |
| Japan | 60,000 | 1,620,000 |
| Australia | 76,103 | 2,050,000 |

Tritium Activity, Biological Effects, and Regulations (Bq L⁻¹)

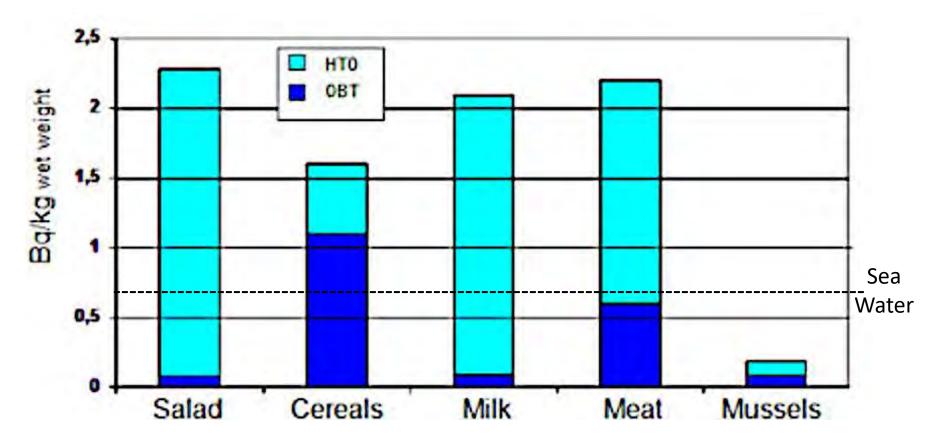


Ionizing Radiation Dose Ranges Chart (Sv yr⁻¹)



TRITIUM IN THE ENVIRONMENT French Institute of Radiation Protection and Nuclear Safety, IRSN, 2012

HTO and OBT in foodstuffs in areas of France not influenced by nuclear facility releases



FIXATION AND LONG-TERM ACCUMULATION OF TRITIUM FROM TRITIATED WATER IN AN EXPERIMENTAL AQUATIC ENVIRONMENT Pacific Northwest National Laboratory, 1975

HTO water was introduced to an experimental freshwater pond with carp, clams, crayfish, periphyton, pondweed and sediments, for 8 months at concentrations of 37,000 Bq/I. All components were sampled on a predetermined schedule. The pond was maintained on uncontaminated replacement waters for an additional 8 months to determine the rate of ³H elimination.

After the first day, HTO in all biota approached an equilibrium with pond water. Final concentration factors of 0.89; 0.87, 0.82, 0.92, 0.77, 0.88 were calculated for carp, clam, crayfish, snail, periphyton, and pondweed.

After only several hours of exposure, the HTO concentration in the organisms were about 90% of that of environmental water.

OBT initially increased rapidly in all biota sampled, but slowed with time. Final concentration factors for carp, clam, crayfish, snail, periphyton, and pondweed were calculated to be 0.49, 0.10, 0.53, 0.54, 0.15, and 0.62.

Loss of tritium from pond waters occurred exponentially with time with less than 10% of the final equilibrium concentration remaining after the first month. Rate of loss of tritium from both animal and plant species was also rapid, with animal forms generally eliminating their respective tritium burdens more rapidly than plant forms. Sediments tended to eliminate tritium more slowly.



Table IV. The Ratio of OBT/HTO for Carp, Clam, Crayfish, Snail, Periphyton and Pondweed Exposed to HTO for Seven Months

| <u>Organism</u> | <u>OBT/HTO</u> |
|-----------------|----------------|
| Clam | 0.17 |
| Periphyton | 0.44 |
| Carp | 0.71 |
| Crayfish | 0.79 |
| Snail | 0.94 |
| Pondweed | 1.31 |



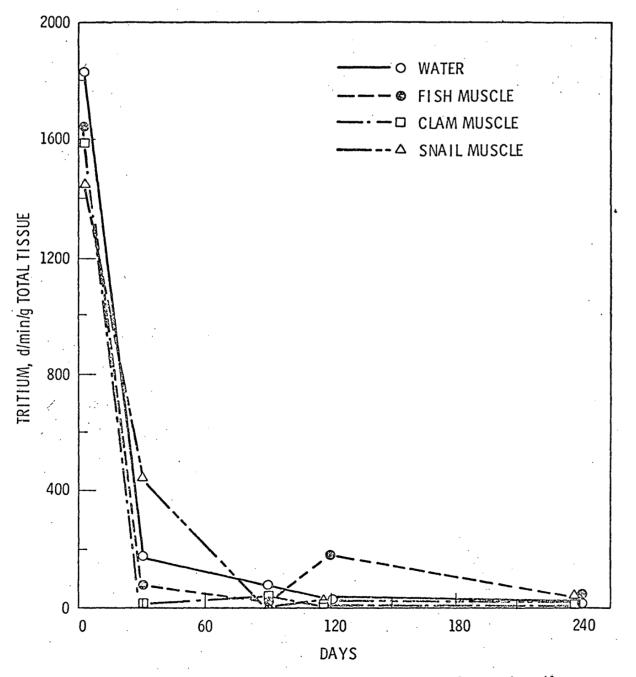


Figure 4. Elimination of tritium from fish, clam, and snail.

TRITIUM (3H) RETENTION IN MICE: ADMINISTERED AS HTO, DTO OR AS ³H-LABELED AMINO-ACIDS (OBT)

Nicholas D. Priest,*† Melinda S.J. Blimkie,* Heather Wyatt,* Michelle Bugden,* Laura A. Bannister,* Yann Gueguen,‡ Jean-Rene Jourdain,‡ and Dmitry Klokov* Health Phys. 112(5):439–444; 2017

Separate cohorts of long-lived female CBA/CaJ live mice weighing about 20 g each were fed or injected with ³H administered as HTO, DTO and OBT. OBT was derived from ³H-bound to the amino acids alanine, proline and glycine.

Mice were entered into the study at 8 wk of age when they started ingesting either HTO or OBT ad libitum.

Six mice were allocated to each treatment group. During the period of ingestion exposure, after 1, 7, 15, and 30 d, some of these groups of mice were euthanized for analysis.

Other groups of mice were euthanized at 2, 4, 8, 16, 32, 64, and 128 d.

For injection studies, mice were injected with 15,000 Bq of ${}^{3}H$.

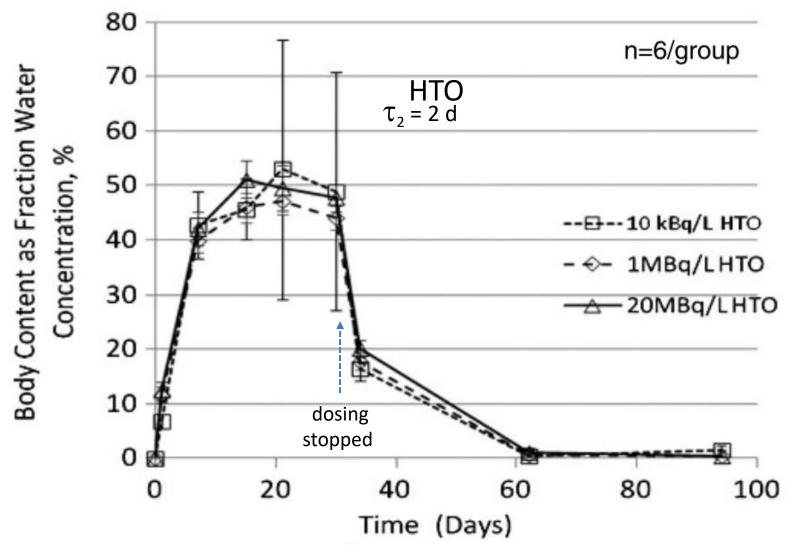
For ingestion studies, Mice were fed continuously for 30 days either 10,000 Bq/l HTO, 1,000,000 Bq/l HTO or 20,000,000 Bq/l HTO

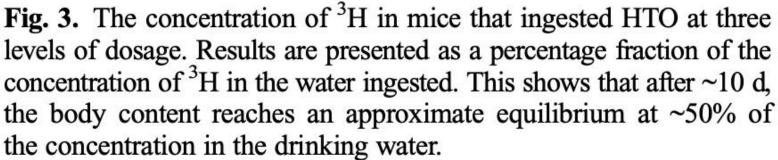
or

10,000 Bq/l OBT, 1,000,000 Bq/l OBT or 20,000,000 Bq/l OBT.

Table 1. Mean and standard deviation of ³H-body content as either HTO or OBT. following the administration of either ³H-light water For toxicity studies in which mice were exposed to ³H for 28 days at the level of 1,000,000 Bq/l, the cumulative average body radiation doses are 1.1 mGy for HTO and 1.4 mGy for OBT, a difference of only 27%.

| | 11110 | (nours) | $1115a11 \pm 50 (70)$ | | $\operatorname{IIIcall} \pm \operatorname{SU}(70)$ | | |
|-----------|-----------------------------------|----------------|-----------------------|------|--|------|--|
| | Tritium as water in body | | | | | | |
| | 3 | | 97.87 | 4.08 | 92.89 | 5.72 | |
| | 7 | | 94.58 | 4.54 | 93.16 | 6.67 | |
| | 24 | | 65.89 | 3.17 | 69.16 | 1.48 | |
| 2 days - | 48 | $\tau_2 = 2 d$ | 46.71 | 1.58 | 51.87 | 1.63 | |
| 4 days - | 96 | L | 23.53 | 1.81 | 28.15 | 2.11 | |
| 16 days - | 384 | | 0.64 | 0.15 | 0.76 | 0.11 | |
| | Organically bound tritium in body | | | | | | |
| | 3 | | 3.81 | 0.45 | 2.28 | 1.42 | |
| | 7 | | 2.64 | 0.45 | 2.52 | 0.80 | |
| | 24 | | 2.61 | 0.16 | 2.96 | 0.28 | |
| 2 days - | 48 | | 2.35 | 0.12 | 2.13 | 0.46 | |
| 4 days - | 96 | τ_2 = 4 d | 1.78 | 0.22 | 1.96 | 0.13 | |
| 16 days - | 384 | | 0.60 | 0.12 | 0.67 | 0.10 | |
| | | | | | | | |





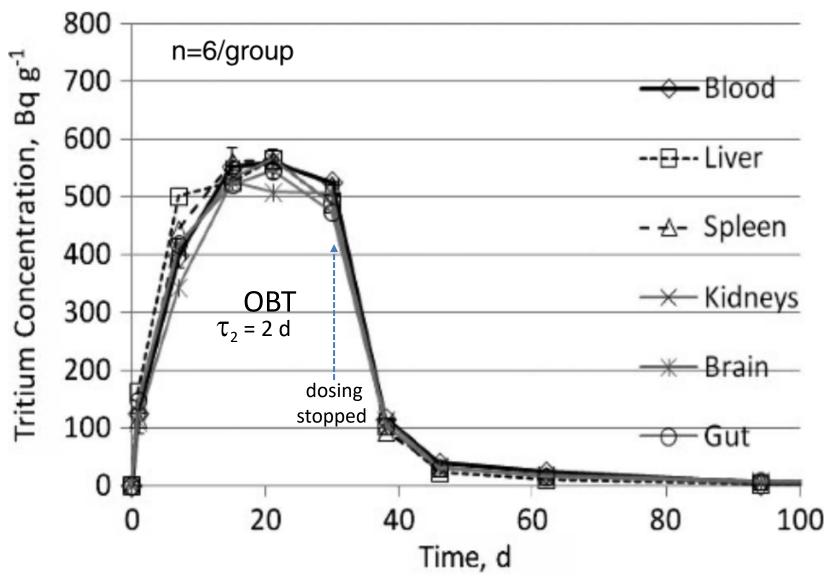
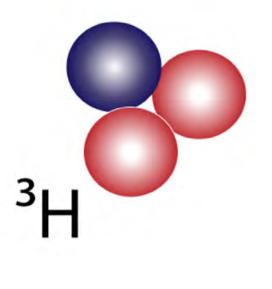


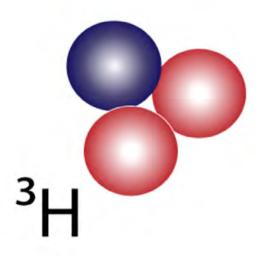
Fig. 4. The concentration of ³H in different soft tissues as a function of time during and post the 30-d administration of ³H as ³H-labeled amino acids (1 MBq L^{-1}).



The Possibility of Discharging Tritiated Water into Cape Cod Bay

Total amounts of ³H in Bq and concentrations of ³H in Bq/l that could be discharged to Cape Cod Bay are extremely low compared to the amount of ³H already in Cape Cod Bay (or in any seawater) and millions of times less than the amount and concentrations required to harm sea life or human life.

Although not necessary, the water could be discharged slowly in a controlled manner, as has been done under regulatory overview at every nuclear power plant in history, including Pilgrim, as no adverse problems have ever been observed from that practice.



Uptake and Elimination in Biota

Uptake of ³H in all biota is fairly rapid. Elimination of HTO is about as rapid.

The binding of ³H to become OBT is highly variable among organisms but mollusks like clams and oysters bind the least. Elimination of OBT is slower than for HTO, but not significantly so as to affect health and the environment.

Estimates of the maximum dose from the discharged Pilgrim water to the public are less than 1 mrem/yr (0.01 mSv/yr).

Comparison of Normal Background Radiation with 1 mrem/yr Worst-Case Peak Dose from Pilgrim Discharged Water (NCRP 2013)

Normal annual exposure from natural radiation

About 620 mrem/yr

- Radon & Thoron gas
- Human body
- Rocks, soil
- Cosmic rays

20 mrem 30 mrem









About 70 mrem/yr

- Medical procedures
- **Consumer products**
- One rnd-trip coast to coast airplane flight
- Watching color TV
- Sleeping with another person
 - ³H Pilgrim water release
- Weapons test fallout
- Nuclear industry

295 mrem 12 mrem 4 mrem

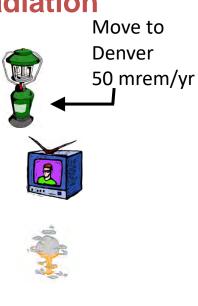
1 mrem

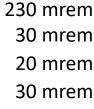
1 mrem

less than 1 mrem

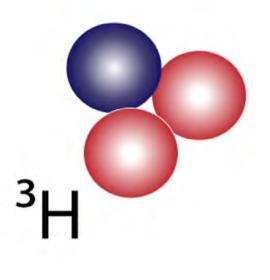
less that 1 mrem

less than 1 mrem









After 50 years of field and laboratory experiments, and environmental and biological monitoring, the scientific community has never observed any humans or organisms in the environment to have been harmed by ³H at any level from any source

Only in the laboratory can we get ³H levels high enough to cause harm, by enriching materials, water or food in ³H almost a billion times above normal levels which takes large amounts of energy and advanced procedures

Questions?



How to Assess Risk

- Regulations assume that radiation risks to humans and the environment exist as a result of any exposure, no matter how small (LNT)
- Exposure to natural background is, on average, about 3 mSv/yr (300 mrem/yr), although global regional averages range from 0.03 mSv/yr to over 100 mSv/yr (10 rem/yr)
- There is no evidence of public health risks at exposures less than 100 mSv/yr (10 rem/yr). Any possible risk is well below the noise level of all other cancer risks faced by humans and the ordinary risks of everyday life
- As an example, regulations require nuclear waste disposal systems to meet release criteria, especially 0.04 mSv/yr (4 mrem/yr) to downgradient drinking water supplies, which is 100 times less than the background in Boston. Moving from Boston to Denver will give you an extra 50 mrem/yr.



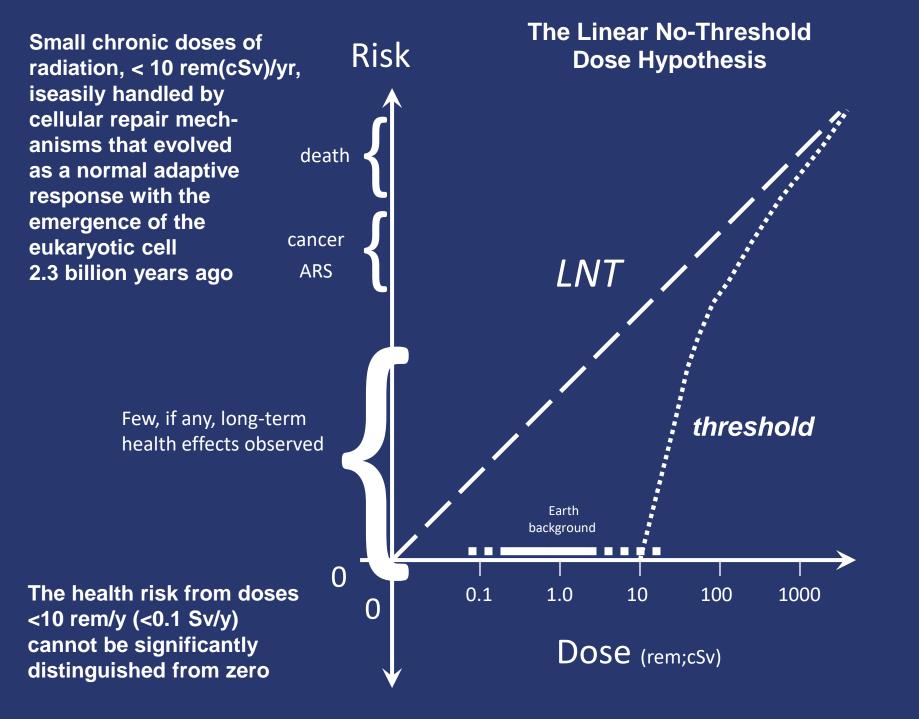
How to Assess Risk

The Massachusetts Department of Public Health determines relative risk of exposure to ionizing radiation above background using the linear, no-threshold dose-response hypothesis, but only when above background, which this water will not be.

But assuming a risk coefficient of 5%/Sv from LNT, then the perceived lifetime risk at 1 mSv represents:

0. 05/Sv-yr x 0. 001 Sv x 70 years = 0.0035 = 0.35% additional risk on top of the natural cancer risk of about 40% for the general public.

EPA says that less than 1 mSv (public dose limit of 100 mrem) is safe and does not add any access cancers to the public.





The Problem With LNT

LNT assumes we have no immune system

Our immune system is very efficient at repairing radiation damage

- changes in gene expression as a function of radiation dose (Yin et al. 2003)
- Stimulates Nrf2 antioxidant response system, as O_2 and O_{\square} (McDonald 2010)
- by-stander effects within tissue matrices (Y Pacheco 2019; CD4⁺ T cells)
- protective changes in the reactive oxygen status of the cells (Spitz et al. 2004; Azzam et al. 2002; Murley et al. 2011)
- apoptosis, which selectively eliminates transformed cells (Bauer 2007; Portess et al. 2007)
- protective control of the cellular and molecular responses by tissuematrix interactions (Barcellos-Hoff and Brooks 2001; Barcellos-Hoff and Costes 2006)
- radioactivated immune cells/molecules include TGF- β_1 , IL-10, NF- κ B, polymorphonuclear leukocytes, and macrophages (Wilson et al. 2021)



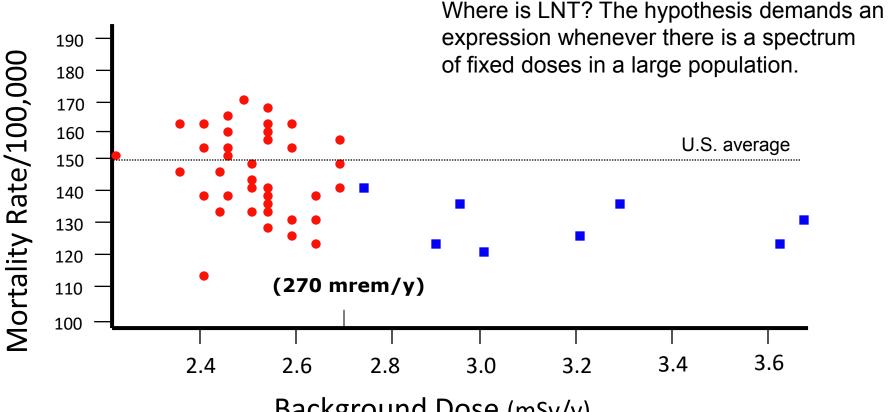
What Are Some Of The Costs Associated With Exceptionally-Low Radiation Limits?

Our regulatory limits are so far down in the noise as to be meaningless from a public health standpoint

- the noise of background radiation levels
- the noise of everyday risks

LNT demands that there be an observable effect as a function of dose

Background Radiation Differences on Annual Cancer Mortality Rates/100,000 for each U.S. State over a 17-Year Period (adapted from Frigerio and Stowe, 1976 with correction for dose using more recent background data from radon).

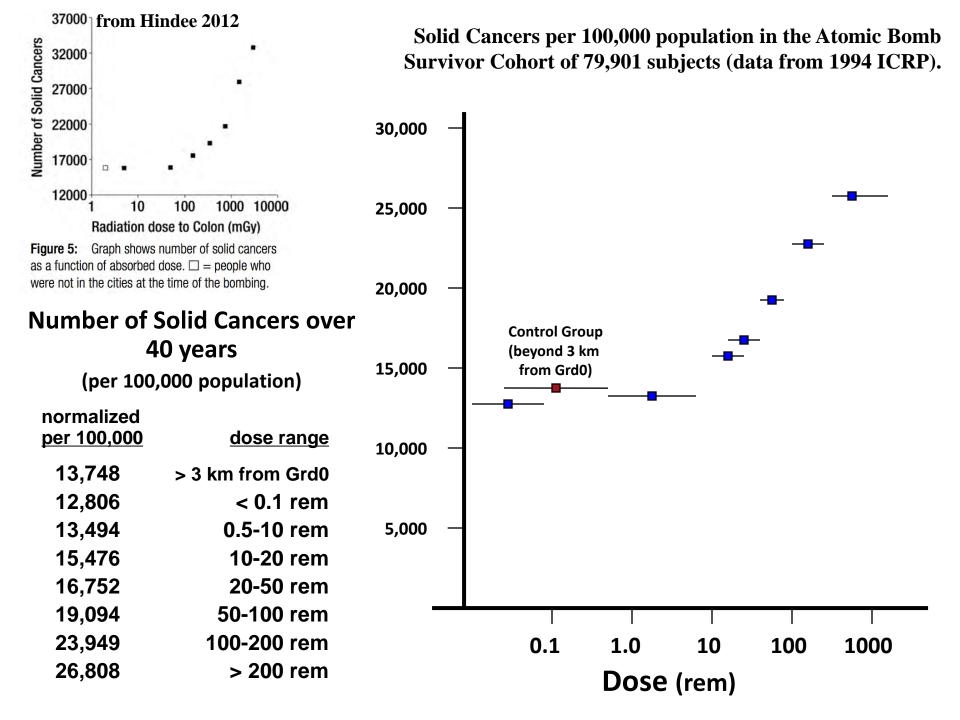


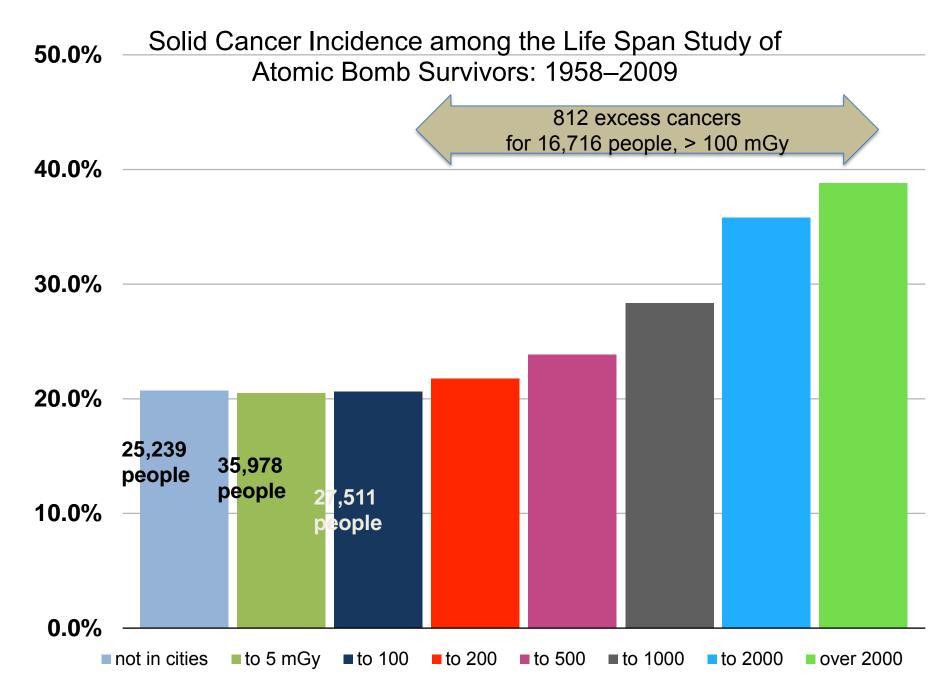
Background Dose (mSv/y)

Cancer Mortality Rates by County (Age-adjusted 1970 US Population) All Cancers: White Males, 1970-94

0 0 00

US = 209.47/100,000 231.90-892.90 (highest 10%) 222.44-231.89 214.45-222.43 208.48-214.44 201.94-208.47 196.23-201.93 189.59-196.22 181.29-189.58 168.23-181.28 92.53-168.22 (lowest 10%) Sparse data (7 counties; 0.0% of dealhs)





Source: Hargraves

Some behavioral risks facing Americans over the past 5 years

alcohol consumption automobile driving coal industry construction food poisoning iatrogenic murder mining nuclear industry opioid deaths police work smoking tobacco accidental falls (> 65 yrs old)

| Activity | Number of Deaths in U.S. over the past 5 years |
|---|---|
| smoking | 2,400,000 |
| iatrogenic (<i>medicine gone wrong</i>) | 950,000 |
| alcohol | 500,000 |
| opioid deaths | 400,000 |
| automobile accidents | 180,000 |
| accidental falls (> 65 yrs old) | 140,000 |
| coal use (19% of U.S. power) | 60,000 |
| murder | 80,000 |
| food poisoning | 25,000 |
| construction | 5,000 |
| police work | 800 |
| mining | 360 |
| nuclear industry (19% of U.S. power) | 1 |

Number of Deaths in U.S. Normalized to Sub-Population

Relative Danger Index

| 1) smoking (43.4 million smokers) | 2,400,000 | 0.07059 |
|--|-----------|-----------|
| 2) alcohol (60 million impacted Americans) | 500,000 | 0.00833 |
| 3) iatrogenic (180 million receive medical treatment) | 950,000 | 0.00527 |
| 4) opioid deaths (100 million prescribed) | 400,000 | 0.00400 |
| 5) accidental falls (46 million over 65 yrs) | 140,000 | 0.00304 |
| 6) police work (720,000 police officers) | 800 | 0.00111 |
| 7) mining (350,000 miners) | 360 | 0.00103 |
| 8) automobile accidents (190 million drivers) | 180,000 | 0.00094 |
| 9) construction (7.7 million workers) | 5,000 | 0.00065 |
| 10) murder (300 million impacted) | 80,000 | 0.00027 |
| 11) coal use (240 million impacted) | 60,000 | 0.00025 |
| 12) food poisoning (304 million eat every day) | 25,000 | 0.00008 |
| 13) nuclear industry (60 million) | 1 | 0.0000001 |
| | | |

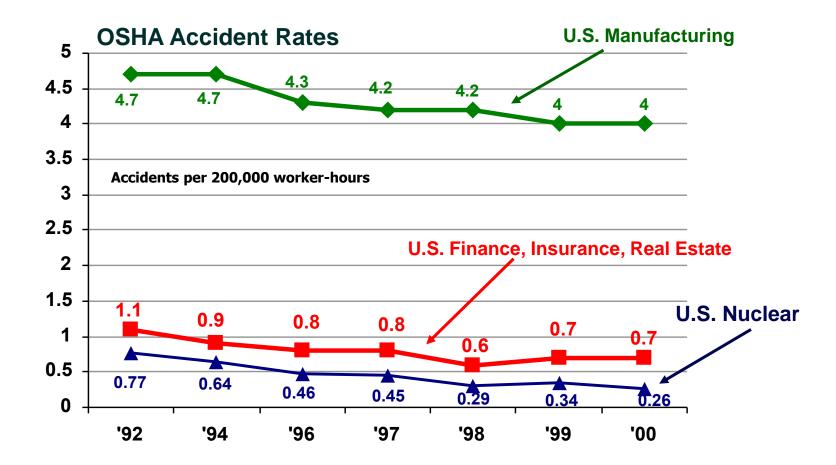
Activity

| Energy Source | Mortality | Rate (deaths per trillion kWh) |
|--------------------------------------|------------------|--|
| Coal – global average | 100,000 | (40% of global electricity) |
| Coal – China | 170,000 | (64% of China's electricity) |
| Coal – U.S. | 10,000 | (19% of U.S. electricity) |
| Oil | 36,000 | (36% of global energy, 8% of global electricity) |
| Natural Gas | 4,000 | (25% of global electricity) |
| Biofuel/Biomass | 24,000 | (21% of global energy) |
| Solar | 440 | (< 1% of global electricity) |
| Wind | 150 | (~ 2% of global electricity) |
| Hydro – global average | e 1,400 | (15% of global electricity, 171,000 Banqiao dead) |
| Hydro – U.S. | 0.1 | (7% of U.S. electricity) |
| Nuclear – global avera | age 40 | (11% of global electricity w/Chernobyl&Fukushima) |
| Nuclear – U.S. | 0.1 | (20% of U.S. electricity) |
| Sources – World Health Organization; | CDC; 1970 – 2011 | U.S. Government assigns a value of \$7 million to a human life |

Beijing, China > 80% coal

Beijing, China

Even non-lethal routine accidents are dramatically lower in the nuclear industry than in any other industry

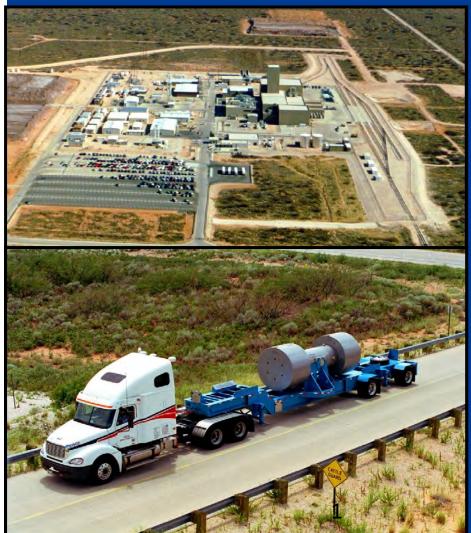


Why is Everyone So Afraid of Nuclear Energy?

- 1) Incorrect, but intentional, association with nuclear weapons during the Cold War 1945
- 2) Becatesed we told the intit obeing of health effects of low radiation doses (LNT) - 1959
- 3) Misunderstanding of the nature and amount of nuclear power waste 1976
 - not much of it (<< 1 km³ worldwide)
 - over 20,000 km³ of direct solid coal waste
 - we know what to do with it

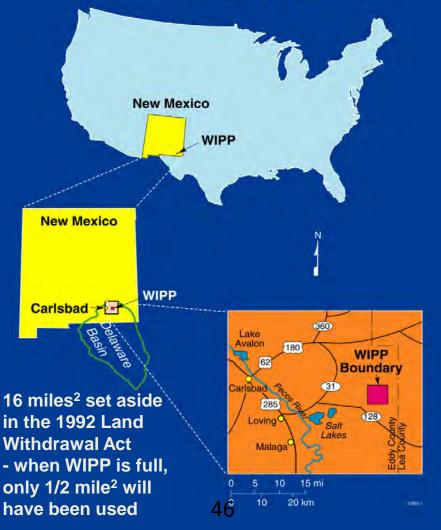
Unknown to most, transuranic waste (bomb waste) continued on into the salt as planned, leading to the Waste Isolation Pilot Plant.

WIPP has shown that geologic disposal of nuclear waste is safe and cost-effective



Only defense-generated TRU waste presently permitted: 100 nCi/g to 23 Ci/L of alpha-emitting ²³⁹Pu equivalents but WIPP was originally designed to handle all nuclear waste

Location of WIPP



We have already disposed of hotter waste than anything at Hanford and have disposed of more waste than all the waste that is left at Hanford. WIPP is ahead of schedule and under-budget

22 years of operation: >90,000 cubic meters of nuclear waste disposed >500,000 fifty-five gallon drum equivalents 22 DOE sites cleaned of legacy waste 1 minor release to the environment 0 deaths 0 people contaminated



What Are Some Of The Costs Associated With Exceptionally-Low Radiation Limits?

- Commercial Nuclear Industry increases costs and increases fear of nuclear power in the public
- Environmental Concerns fear prevents nuclear power from addressing climate change, human health and the environment
- Nuclear Waste increases cost of repositories and prevents siting at most optimum geographic and geologic locations
- Medicine causes radiation phobia that prevents certain medical diagnostics and treatments involving radiation
- Emergency Preparedness after nuclear/radiological accidents, it causes extreme radiation phobia that has harmed or killed more people than the incident itself (Fukushima, Chernobyl, future dirty bomb attack) and that prevents reasonable emergency planning and effective responses to future disasters



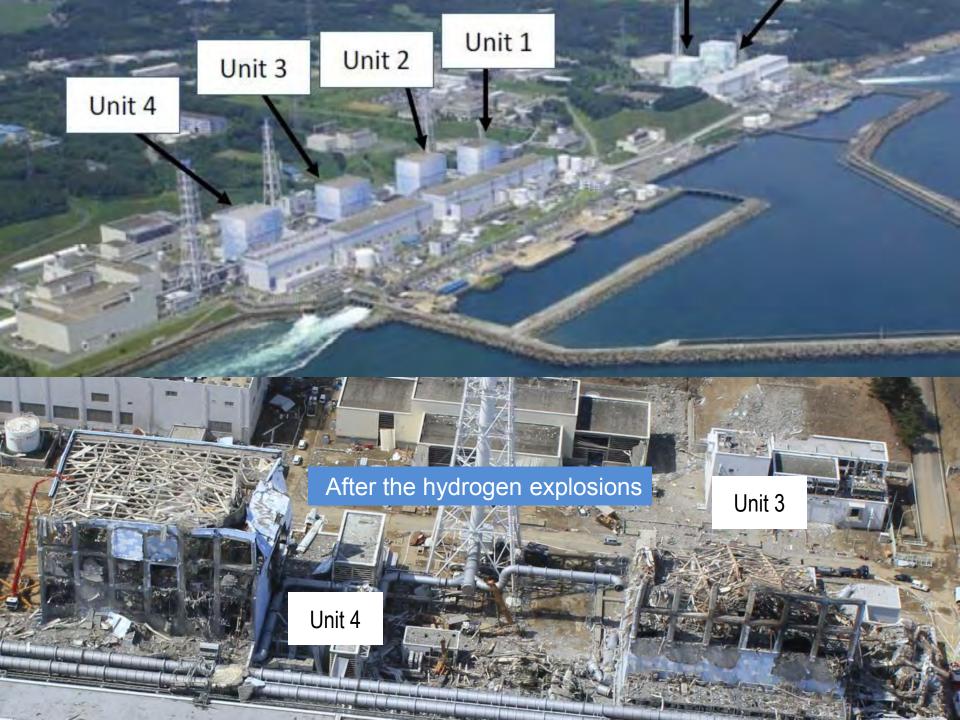
What Are Some Of The Costs Associated With Exceptionally-Low Radiation Limits?

Causes extreme radiation phobia following nuclear or radiological incidents and accidents

- Loss of lives and severe injuries associated with frantic evacuations
- Increased suicides and psychosomatic disorders

- Increased drug/alcohol/cigarette abuse

- Unnecessary permanent abandonment of properties for contamination well within the levels of natural Earth background
- Extreme costs of clean-up relative to actual risk





Forced evacuation of 160,000 from provinces surrounding Fukushima resulted in about 1,600 deaths mainly of elderly and disabled. Most adults could have returned after 2 months (I-131)

According to the World Health Organization -

- no acute radiation injuries or deaths among workers or public from exposure to radiation resulting from Fukushima accident.
- the lifetime radiation-induced cancer risks are much smaller than the lifetime baseline cancer risks.
- For about 160 workers who received whole body effective doses over 100 mSv, expected increased cancer risks will not be detectable against the normal statistical fluctuations in cancer incidence for this population.



Over 50% of residents have returned, mostly older citizens, but the damage has been done – Government estimates the cost at over US\$200 billion.

- at an average of \$39,000 per capita GDP, revenue losses since 2011 exceed \$40 billion for that cohort
- \$12 billion in compensation paid to displaced residents
- Unnecessary shutting of all nuclear plants, most were not at risk
 - > increased fossil fuel use by about 25%
 - increased energy prices by about 20%
 - lowered air quality (estimates of > 15,000 additional premature deaths from fossil fuel particulate emissions)



• Japan's Government foolishly *lowered* the radiation limits on food after Fukushima thinking that would appear as proactive

| Regulatory Limits | On Radioactivity In | Foods (in Bq/kg) |
|--------------------------|---------------------|------------------|
|--------------------------|---------------------|------------------|

| <u>Country</u> | <u>Milk</u> | <u>Foodstuffs</u> | <u>Babyfoods</u> |
|----------------|-------------|-------------------|------------------|
| Japan | 200 | 100 | 50 |
| U.S. | 1,200 | 1,200 | 1,200 |
| E.U. | 1,000 | 1,250 | 400 |



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 destroyed much of the farming and fishing industry in northern Japan, mostly in areas unaffected by any radiation: >\$10 billion losses

But with its own Chernobyl effect, the Fukushima disaster proved to make the fisheries off the coast a *de facto* marine protected area and fish stocks have tripled in these waters since 2011



What Are Some Of The Costs Associated With LNT for The Nuclear Industry?

A NPP spends about \$20 million/yr in rad protection, waste handling and emergency prep, in large part to address the fear and regulatory requirements associated with LNT-based limits

• >\$1 billion/year for the industry

Premature closings/planned shutdowns of nuclear reactors within the U.S. by 2025, with no safety or engineering reasons, just shortterm profits, fear and politics, presently stands at 25, losing –

- 5 trillion kWhs of low-carbon power worth over \$800 billion
- 600,000 man-years of direct labor worth \$70 billion in salaries
- 2 million man-years of indirect jobs worth over \$100 billion
- over \$6 billion in local and state taxes
- 15,000 tons of SNF orphaned onsite



What Are Some Of The Costs Associated With LNT for Nuclear Waste Disposal?

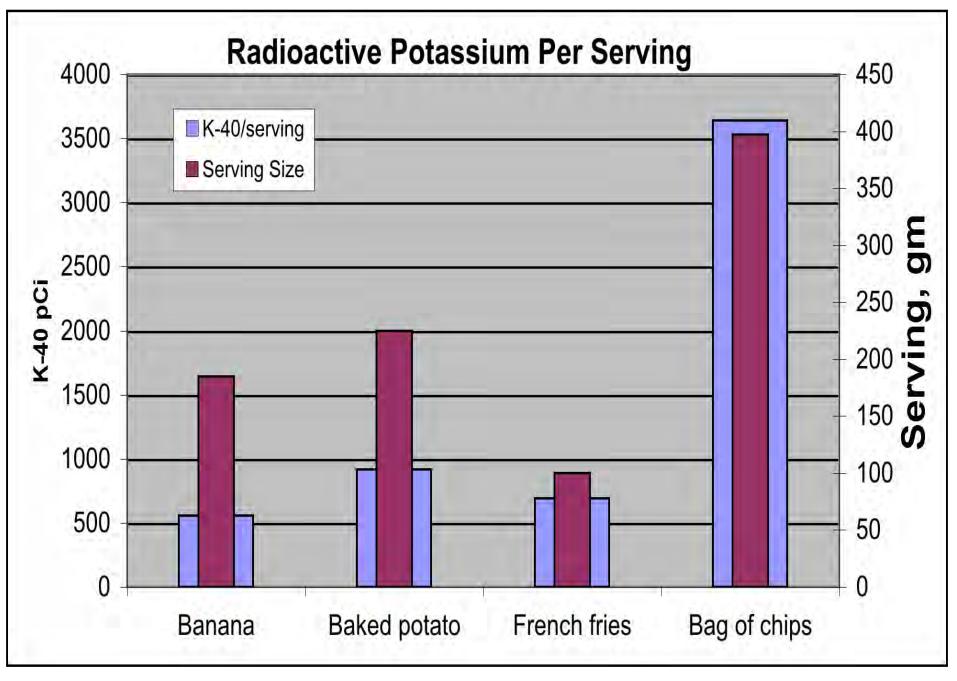
Main effect has been to completely stop our nuclear waste disposal program because of fear, preventing science-based decisions:

- gave us glass over grout for HLW, even thought grout is better, and cheaper, for most HLW
 - the Hanford vitrification program, not including repository costs, will exceed \$90 billion versus \$30 billion for grouting and disposal elsewhere (not including repository costs), versus \$30 billion for grouting in-place, even though there is no statistical difference in their risks.
- has made it impossible to site a repository and has prevented us from correctly reclassifying HLW at Hanford to TRU/LLW
- unnecessary engineered barriers at Yucca Mt, such as Ti-drip shields (\$30 billion), increasing total disposal costs by over \$300 billion



What wre/ithen cost Weef Cogside in ghead altion of loses thus and lose tevels?

\$7 million is the value of a human life according to EPA \$316,000 is the average paid out in health care over a life \$129,000 is the average historic legal value of a human life \$12,420 (death benefit to families of deceased soldiers) \$45 million (value of a single healthy human life when chopped up and sold on the black market for body parts) \$2.5 billion per theoretical human life saved (LNT vs 0.1 Sv/yr) \$100 per human life saved by immunization against measles, diphtheria, and pertussis in developing countries



Source: Dan Yurman, 2011

Ionizing radiation causes damage primarily by displacing electrons in the target material, just like oxygen does, making radiation an oxidant. Those electrons then displace other electrons, and so on until the energy is dissipated.

 α, β, γ

 ${ \ \ \ }$

H

H2

Thousands of such displacements can occur for a single event. The immune system can handle millions of such events per day.

H

 α, β, γ

H

Н

H

H

H

H

Separate from the currents and wave action, there is also the process of simple diffusion occurring in the seawater

 $x = (Dt)^{1/2}$

where

x is distance in cm D is the diffusion coefficient (cm²/sec) t is time (sec)

D for HTO = $2.3 \times 10^{-5} \text{ cm}^2/\text{sec}$

D for ${}^{3}H = 9.2 \times 10^{-5} \text{ cm}^{2}/\text{sec}$

Or about 15 ft/day for HTO and 60 ft/day for ³H

Concentration decreases as 1/r²