

New Protective Action Guides for Nuclear Accidents

Why We Oppose Them

The U.S. Environmental Protection Agency's protective action guides (PAG) are supposed to help federal, state and local emergency response officials make plans for radiation emergencies. But the new Protective Actions Guides are a huge step in the wrong direction.

EPA's Protective Action Guides Manual is an 80-page document designed to assist public officials. It guides emergency responders after a large-scale nuclear emergency, when radiation levels pose a danger to public health. On June 10, 2016, EPA requested public comment on a finalized PAG Manual to be issued by the end of the year.



The public comment deadline is July 25.

Protective Action Guides are triggered by radioactive accidents of any size: a spill, a leak, a transport accident, a dirty bomb or a nuclear power plant meltdown. The PAG Manual includes numerical radiological protection criteria and recommended protective actions. During an incident with an uncontrolled source of radiation, emergency response agencies would be called upon to take action. Such intervention is termed *protective action*. Examples of protective action include:

- Evacuation of an area
- sheltering-in-place within a building or protective structure
- administering potassium iodide (KI)
- acquiring alternate sources of drinking water
- bans on food or milk products

EPA has proposed to significantly raise the allowable levels of radioactivity in drinking water following nuclear accidents. EPA is proposing drinking water PAGs of:

- 500 mrem projected dose, for one year, to the general population.
- 100 mrem projected dose, for one year, to the most sensitive populations (e.g. infants, children, pregnant women and nursing women).

The Safe Drinking Water Act standard is 4 mrem/year. If this guidance is approved, the allowable concentrations of radioactive elements would rise hundreds or thousands of times above the current Maximum Concentration Levels allowed under the Safe Drinking Water Act. After an accident, EPA could allow people to drink water with vastly higher levels of radioactivity.

Problems with the Protective Action Guides:

1. The proposal to allow, for one to several years after a release, radioactive contamination of drinking water at levels orders of magnitude above EPA's longstanding Safe Drinking Water Act limits,
2. The adoption of long-term cleanup standards vastly less protective than EPA's historically acceptable risk range,
3. The elimination of relocation for high thyroid and skin doses and for high projected cumulative whole body doses,
4. The recommendation to permit radioactive waste to be disposed of in unlicensed disposal sites, including regular municipal garbage dumps,
5. The inappropriate expansion of the PAGs to cover essentially all radioactive releases,
6. The reliance on dose limits as high or higher than those in effect decades ago despite the fact that official estimates of cancer risks from radiation have increased significantly over that period, and
7. Retention of archaic and extremely high FDA food contamination guidelines.

What you can do

Tell EPA to abandon all efforts to set water PAGs that are weaker than the Safe Drinking Water Act limits, and instead, provide real, concrete guidance to authorities on how to safeguard water supplies so as to protect the public.

Submit your comments on The Draft Protective Action Guide for Drinking Water
EPA Docket number EPA-HQ-OAR-2007-0268

The public comment deadline is July 25. To access EPA documents and find out more about what EPA plans to do, comment, go to their webpage at:

<https://www.epa.gov/radiation/protective-action-guides-pags#tab-1>

Submit comments via the Federal eRulemaking Portal at: <http://www.regulations.gov>

Be sure to include the Docket ID: **EPA-HQ-OAR-2007-0268**

Resolved: We oppose any weakening of drinking water standards for radioactivity. The Safe Drinking Water Act limits should be complied with. The Protective Action Guides should do what they are supposed to do: provide protective action guidance for authorities on how to treat contaminated water or provide alternative drinking water supplies.

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