To the Nuclear Regulatory Commission,

My name is Melissa Bumstead, of West Hills, California. I am the founder and co-director of Parents Against Santa Susana Field Lab (PASSFL). My daughter is a two-time cancer survivor. I believe her cancer was caused by contamination from the Santa Susana Field Lab (SSFL).

NRC-2025-1140 IS NOT BASED ON CURRENT SCIENCE

The proposed rule does not incorporate the breakthrough studies that have found that even a minuscule amount of radiation, if ingested or breathed, may cause cancer. My community is living proof of the harm caused by radiation exposure at microscopic levels.

My community has been fighting for the cleanup of the radioactive waste near our homes for decades. We know firsthand that even minimal exposure to radiation can harm our environment and families. According to a 2007, federally funded epidemiological study by the University of Michigan, people living within two miles of the SSFL experience 60% higher cancer incidence rates than those living five miles away. There is NO safe level of exposure to radiation according to our lived experiences.

DEFEND ALARA AND LNT MODELS

Please reject the proposed revisions stemming from Section 5(b) of Executive Order 14300. The NRC should defend ALARA (As Low As Reasonably Achievable) and the Linear No-Threshold (LNT) model as fundamental principles of radiation protection.

Weakening or discrediting these protections could have consequences far beyond the NRC's own regulatory framework. Other federal and state agencies, regulators, and industries look to the NRC for precedent and guidance on radiation protection. A retreat from these long-standing principles could therefore create a ripple effect, weakening public-health protections across the nation.

The Department of Energy (DOE), which is responsible for the cleanup of radioactive contamination at the SSFL, has suggested to the public that the NRC's move away from the LNT model could provide justification for leaving more radioactive contamination onsite, even though DOE is not regulated by the NRC.

This demonstrates how changes to the NRC's radiation-protection framework could

establish a dangerous precedent extending far beyond the NRC's direct jurisdiction, potentially influencing cleanup standards and radiation-protection decisions made by other federal and state agencies. The NRC must recognize that the consequences of these changes, whether intended or not, will be far-reaching and long-lasting, ultimately weakening protections against unnecessary radiation exposure rather than strengthening them.

NRC-2025-1140 SHIFTS COSTS TO THE PUBLIC

Over 100 children in the communities surrounding the SSFL have been diagnosed with rare forms of cancer. My daughter's cancer treatment cost over $2M to save her life. Though we had excellent private insurance, we still went through our entire life savings. We continue to pay for her follow-up care.

"New findings that describe the financial hardship faced by families with a child being treated for acute lymphocytic leukemia…nearly a third of these families face serious hardship during the child's treatment, such as being unable to afford food or losing at least 25% of the household income, a level that published literature considers "catastrophic." (2025: When a Child Is Treated for ALL, a Family's Financial Pain Unfolds Over Time)

Additionally, part of my community is a designated "Environmental Justice" community by the State of California, where they face a disproportionate pollution burden but also socioeconomic difficulties.

Many of the children in our community had more expensive treatment than my daughter. Many of those children did not survive. My daughter is one of the few survivors, yet 60% of all childhood cancer survivors are diagnosed with debilitating diseases due to the toxicity of their treatment. (Alex's Lemonade Stand Foundation, "Key Cancer Facts").

Breakthrough research is showing that radiation harms women more than men, causing cancer and disease. The transgenerational effects of radiation exposure, including mutations or epigenetic changes, are still being studied, but early findings suggest that DNA damage from radiation exposure may cause biological harm in future generations. These issues should be prioritized for research BEFORE any changes are made to NRC's exposure regulations.

IN OPPOSITION

Because my family and I already face the risk of exposure to even minuscule amounts of radiation from the SSFL, and because I have witnessed firsthand my daughter's devastating suffering from cancer, I oppose NRC-2025-1140 and the proposed revisions from EO 14300 Section 5(b).

I respectfully ask that the public be included in further, meaningful engagement with the NRC to strengthen radiation protections together.

Sincerely,
Melissa Bumstead, Parents Against SSFL