



TMI Unit-2 Community Advisory Panel

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**David J. Allard, Chairperson
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August 31, 2026

Jody C. Martin
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Mail Stop O-16 B33
Washington, DC 20555-0001

Re: Petition related to the proposed Radiation Protection Framework, Docket ID NRC-2025-1140

Dear NRC Secretary Martin,

On behalf of the Three Mile Island Unit-2 Community Advisory Panel, I submitted the attached Petition as comments to the US NRC regarding the proposed Radiation Protection Framework rulemaking published in the Federal Register on July 15th, Docket ID NRC-2025-1140. This formal Petition recommends NRC halt all proposed radiation protection (RP) regulatory updates until they are vetted by the federal Interagency Steering Committee on Radiation Standards (ISCORS), with a complete review of all federal agency RP regulations related to worker, patient and public radiation exposure, and environmental releases. Given the following facts:

- NRC has failed to consult with the EPA, DOE and DoD as directed by EO14300, Sec. 5(b),
- The ALARA radiation protection practice and LNT construct are science-based,
- Radioactive material and ionizing radiation provide great benefits to society,
- Exposure to radiation at high levels is known to be harmful to humans,
- And effects at low levels are observed through epidemiological studies,
- The proposed RP regulatory updates will provide no improvement as drafted,
- NRC has grossly underestimated the cost to states and regulated community to implement,
- Simple lower limits and well defined guidance on implementing ALARA is what industry needs,
- ISCORS should be directed to review all federal RP regulations for uniformity and compliance with current national and international standards and recommendations.

As members of the public who live and work near TMI, with legal standing, and great concern for the local community, Commonwealth's, and nation's health and safety – we compel the NRC to broaden their view and reevaluate its approach for updating the entire federal government's RP regulatory framework.

Respectfully submitted,

David J. Allard (e-signature)

David J. Allard, MS, CHP, FHPS

cc: CAP Members

Attachments