

TRI-VALLEY CARES

ALARA UNDER ATTACK: WHAT THE NRC'S RADIATION RULE COULD MEAN FOR LIVERMORE AND BEYOND

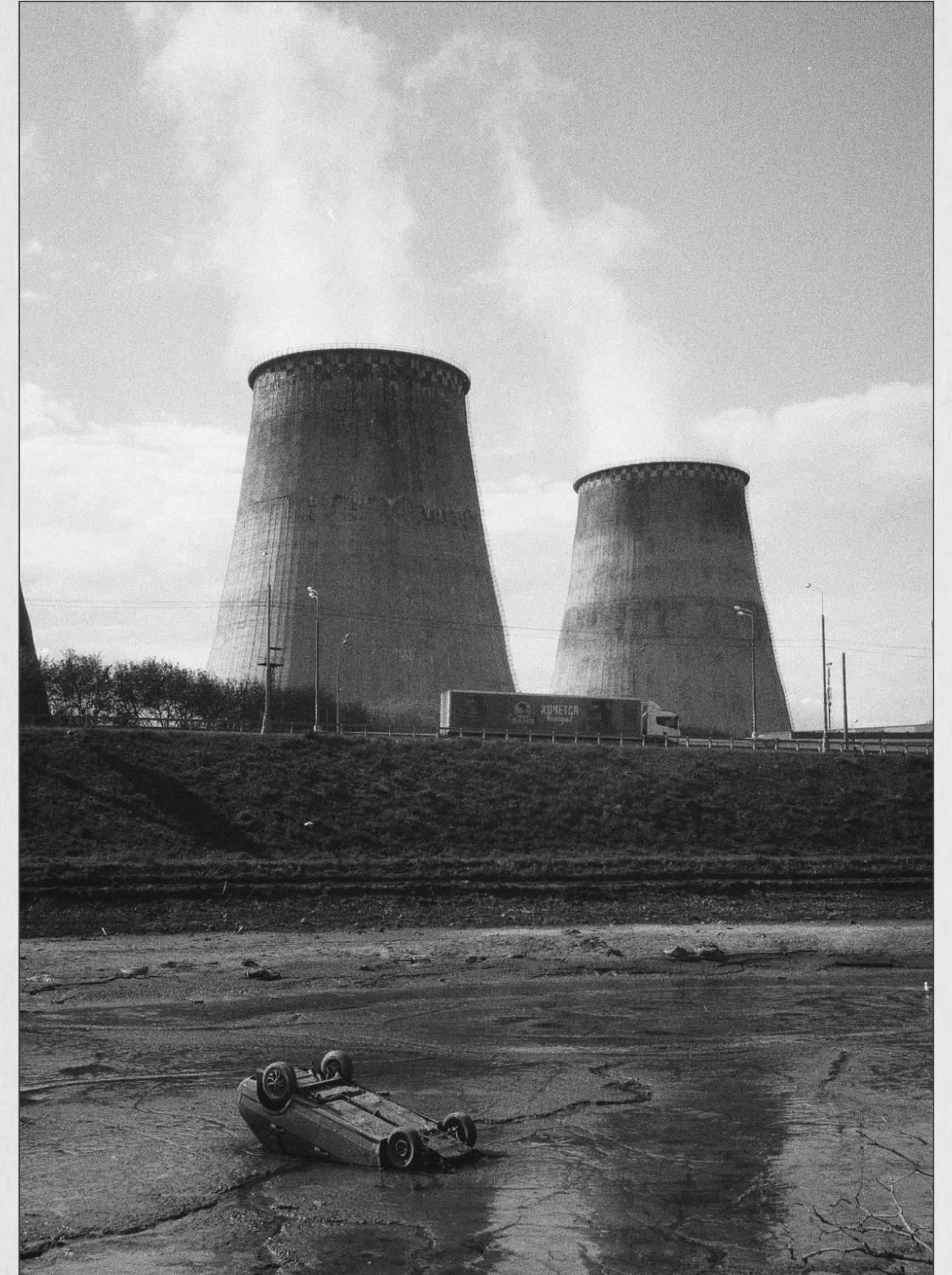
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THE NRC HAS PROPOSED A MAJOR REWRITE OF RADIATION PROTECTION RULES. THE PROPOSED RULE WOULD REMOVE ALARA LANGUAGE FROM NRC REGULATIONS.

PUBLIC COMMENTS ARE
DUE AUGUST 31, 2026.

**WHY ARE
WE TALKING
ABOUT THIS
NOW?**



WHAT DOES ALARA ACTUALLY
MEAN?

ALARA = AS LOW AS REASONABLY ACHIEVABLE



**RADIATION EXPOSURE
SHOULD BE:**

- **BELOW LEGAL LIMITS AND**
- **REDUCED FURTHER WHEN
REASONABLY POSSIBLE**

NO SCIENTIFIC THRESHOLD HAS
BEEN ESTABLISHED BELOW
WHICH RADIATION-RELATED
CANCER RISK IS KNOWN TO
DISAPPEAR.



**REMOVE ALARA
AND REPLACE IT
WITH A
“GRADED
APPROACH”**

WORKERS
ALLOW UP TO 2× THE NORMAL
ANNUAL DOSE LIMIT

RADIOACTIVE RELEASES
RAISE AN AIR-EMISSION
CONSTRAINT FROM 10 → 25
MREM/YEAR

PUBLIC EXPOSURE
ALLOW FACILITIES TO REQUEST
DOSES ABOVE THE NORMAL
PUBLIC LIMIT

MORE “FLEXIBILITY” FOR
OPERATORS = MORE RISK FOR
EVERYONE ELSE

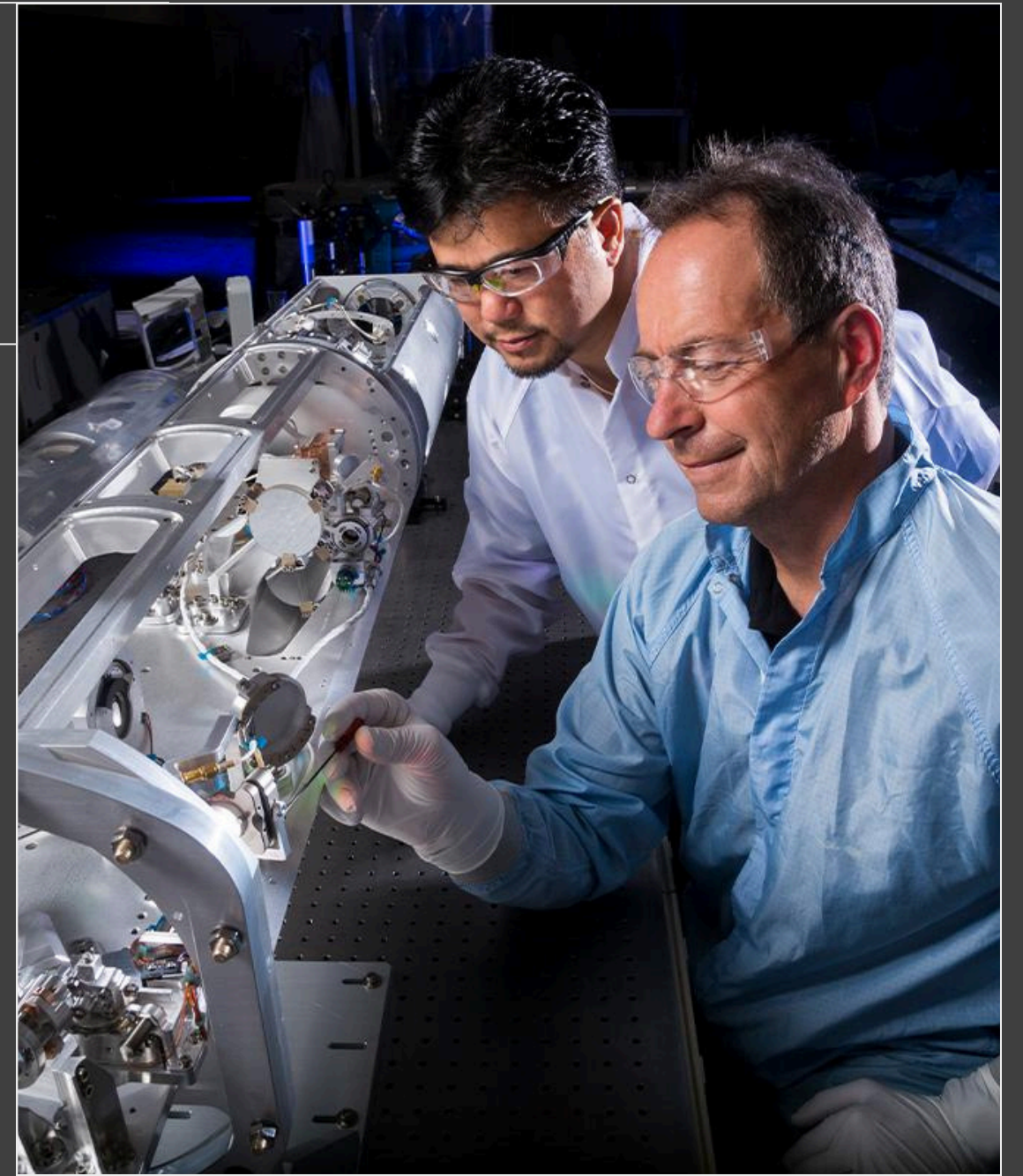
WHAT IS THE NRC
ACTUALLY
PROPOSING?

THE NRC CALLS IT “UNUSED RETROSPECTIVE DOSE”

NORMAL WORKER LIMIT: 5 REM/YEAR

- PROPOSED POSSIBLE EXPOSURE: UP TO 10 REM IN ONE YEAR
MAXIMUM ACROSS 5 YEARS: 25 REM

- A WORKER'S AVOIDED
RADIATION EXPOSURE IS NOT
AN ASSET FOR THEIR
EMPLOYER TO SPEND LATER.



SHARED CONTRACTORS

SHARED WORKERS

**WASTE & TRANSPORTATION
NETWORKS**

FEDERAL POLICY PRECEDENTS



THE DEFENSE NUCLEAR
FACILITIES SAFETY BOARD HAS
DESCRIBED DOE'S ACTION AS
INVOLVING "POTENTIAL
REVISIONS" TO 10 CFR PART 835

DOE CURRENTLY REQUIRES
WORKER DOSES TO BE:
BELOW LIMITS + ALARA



IN JANUARY 2026, ENERGY SECRETARY CHRIS WRIGHT APPROVED A PLAN
TO ELIMINATE ALARA FROM DOE DIRECTIVES AND REGULATIONS.

**LIVERMORE IS NOT
DIRECTLY NRC
REGULATED. SO WHY
DOES THIS MATTER?**

NOT EVERYONE BEARS RADIATION RISK EQUALLY

**“THE PUBLIC” IS NOT
ONE GENERIC PERSON**

RADIATION IMPACTS AND EXPOSURE CIRCUMSTANCES DIFFER BY AGE, SEX, PREGNANCY, OCCUPATION, EXISTING EXPOSURES AND WHERE PEOPLE LIVE AND WORK

WHO HAS THE LEAST POWER TO
AVOID EXPOSURE?

- CONTRACT WORKERS
- NEARBY COMMUNITIES
- CHILDREN
- PEOPLE LIVING NEAR
MULTIPLE POLLUTION
SOURCES
- FUTURE GENERATIONS

TVC OPPOSES NRC-2025-1140

**RADIATION PROTECTION SHOULD
GET STRONGER AS SCIENCE
IMPROVES; NOT WEAKER BECAUSE
PROTECTION COSTS MONEY.**

**KEEP ALARA
ENFORCEABLE**

**REJECT WORKER “DOSE
BANKING”**

**KEEP STRONG
MONITORING & REPORTING**

**CONSIDER IMPACTS ACROSS
THE NUCLEAR WEAPONS
COMPLEX**

**WHAT IS TVC
ASKING FOR?**

