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January 8, 1999

William M. Beckner, Executive Director
National Council on Radiation Protection
and Measurements
7910 Woodmont Avenue, Suite 800
Bethesda, MD 20814-3095

Dear Mr. Beckner:

Thank you for the opportunity to provide comments and suggestions on the draft report prepared by National Council on Radiation Protection and Measurements (NCRP) Scientific Committee 1-6 entitled, "Evaluation of the Linear Nonthreshold Dose-Model Response." In general, a majority of Nuclear Regulatory Commission (NRC) staff who reviewed the draft report concluded that the report is well written and compiles a great deal of useful, state-of-the-art information. The members of the Scientific Committee have done an outstanding job reviewing and summarizing the current literature. The chapter Summaries and Research Needs are particularly useful. It is the opinion of several of our staff that this report, when finalized, should be used as a primer on the current understanding of the underlying mechanisms of the health effects associated with ionizing radiation.

Several NRC staff, however, expressed disappointment in the draft report for a variety of reasons. For example, in the Executive Summary the Scientific Committee concludes "that the risk from radiation increases monotonically with dose, in the low dose region above background levels", but this conclusion was not supported by laboratory animal or human epidemiological data. The lack of observable health effects in laboratory animals or humans after exposures in the low dose region is the crux of the linear, nonthreshold debate. Additionally, no compelling argument to refute Dr. Cohen's radon studies is presented. Finally, several NRC staff observed that the technical detail of the report might overwhelm many readers and they suggested that many of the technical details contained in chapters 3 through 10 should be included in one or more appendices.

After reviewing the comments provided by the NRC staff, we recommend that the scientific committee prepare a Preface in which the purpose of the draft report is clearly elucidated in plain, simple language and the intended audience described.

Finally, the NRC would appreciate receiving, 7 to 10 days before public release, an advance copy of future reports funded by this agency. This courtesy provides the NRC staff an opportunity to review the report, brief the NRC Commission, and prepare a public release, if appropriate.

A/B

For additional information concerning this review, please contact Dr. E. Vincent Holahan at (301) 415-6272.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl A. Trottier". The signature is cursive and somewhat stylized.

Cheryl A. Trottier, Chief
Radiation Protection and Health Effects Branch
Division of Regulatory Applications
Office of Nuclear Regulatory Research

For additional information concerning this review, please contact Dr. E. Vincent Holahan at (301) 415-6272.

Sincerely,

Original Signed By:

Cheryl A. Trottier, Chief
Radiation Protection and Health Effects Branch
Division of Regulatory Applications
Office of Nuclear Regulatory Research

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