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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Dade W. Moeller, Ph.D.
Associate Dean for Continuing Education
Office of Continuing Education
Harvard School of Public Health
667 Huntington Avenue
Boston, MA 02115

Dear Dade:

I appreciate the attentive audience that the NRC Advisory Committee on Nuclear Waste (ACNW) provided during our presentations on EPA's High-Level Waste Standards (40 CFR 191). However, I still came away with an uncertainty as to where the real criticism lies. Whatever it is, risk adversity, probabilistic uncertainties, or concern for NRC implementation, we would appreciate a definitive statement of the concern and its basis.

I gathered that you favored the approach of ICRP Report 46. We would be interested in your views on its' difference with the EPA approach. Report 46 applies its probabilities to individual risks, an approach we found could flunk sites that the EPA Standard would pass. This becomes largely a function of the time over which the release would occur, a matter that we could see causing some havoc in licensing, with perhaps no definitive answer. Also, the total release can be modeled easier and with more certainty than the time differential of the release.

Relative to truncation of individual doses and the use of collective doses, I ran across the enclosed comment by Bo Lindell, past ICRP President, that I found interesting, I think you will too.

In conclusion, let me reiterate that when the ACNW makes their evaluation of the EPA 40 CFR 191, I hope they make it in terms of direct, definitive statements of problems found or perceived. We would also appreciate the opportunity to sit down and discuss the points with the Committee.

Sincerely yours,

Floyd L. Galpin, Chief
Waste Management Standards Branch
Criteria and Standards Division
Office of Radiation Programs (ANR-460)

cc: Melvin Carter
James Martin

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