



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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Mr. Frank Kinnelly, Director
Office of Nuclear Technology and
Safeguards
Nuclear Energy and Energy Technology
Affairs
Department of State
Washington, D.C. 20520

Dear Mr. Kinnelly:

The NRC reserves its position on Item 1 on the September 20 IAEA Board of Governors Meeting Agenda for reasons such as the following:

1. This draft, which is dated April 1989, was not received in NRC until late August, only a few weeks before this meeting, making it difficult to complete staff and Commission review.
2. Preliminary review indicates that the draft still uses the earlier ICRP Report 26 mortality risk coefficient of 10^{-2} /Sievert which results in an estimated 10^{-5} per year risk based on a dose of 1 milliSievert per year. Previous comment from the U.S. and current thinking suggest use of a mortality risk coefficient about an order of magnitude higher, which would equate a dose of 0.1 milliSievert per year to a latent cancer fatality risk of 10^{-5} per year. We understand that the ICRP is planning to issue a revision to its fundamental radiation protection guidance (ICRP 26) sometime next year; we expect it to support the latter suggested risk coefficient.
3. The draft still seems to contain no recognition of alternate standard forms such as release quantity limits which are proposed in the U.S. in conjunction with individual exposure limits.
4. There may be a need for significant clarification in the wording used to relate disruptive process, random events, probabilistic analysis and risk.

A proposed talking point on Number 2 above for Ambassador Kennedy's statement on Agenda Item 1 at the Board of Governors meeting follows:

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Mr. Frank Kinnelly

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mortality risk coefficient about an order of magnitude higher. We understand that the ICRP is planning to issue a revision to its fundamental radiation protection guidance sometime next year; we expect it to support the higher risk coefficient.

Sincerely,

James R. Shea, Director
International Programs, GPA

cc: R. Stratford, State/OES
C. Newstead, State/OES

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