

May 18, 2004

Dr. Abel Gonzalez  
International Atomic Energy Agency  
Wagramerstrasse 5, P.O. Box 100  
A-1400 Vienna, Austria

Dear Dr. Gonzalez:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am writing to express appreciation for your taking the time to meet with each member of the Commission, as well as members of the NRC staff, to discuss areas of mutual interest and progress on initiatives that will enhance the protection of public health and safety and the environment throughout the world. In this regard, the Commission supports the development of an international radiation protection framework that includes standards that are realistic, workable, and risk-informed. We value the long history of cooperation between the NRC, the International Atomic Energy Agency (IAEA), and the International Commission on Radiological Protection (ICRP) and continue to support your efforts to improve, integrate, and harmonize the existing international radiation protection framework.

The Commission believes that the limited resources available to address key radiation protection issues should be applied to activities that are likely to provide a demonstrable improvement in protection of public health and safety and the environment. For example, since the events of September 11, 2001, the international community, with leadership from the IAEA, has made progress in increasing the security of civilian radioactive sources through development of the "Code of Conduct on the Safety and Security of Radioactive Sources." Similarly, IAEA and ICRP efforts to prevent high-dose rate brachytherapy accidents are also focused on improving practices in industrialized and developing nations so as to avoid potentially severe accidents.

In contrast, some efforts, such as developing standards for the protection of non-human species, are designed mainly to fill a conceptual gap. The Commission has deep misgivings with, and is highly skeptical of, the need to develop separate standards for the protection of non-human species. There is no evidence to suggest that the existing regulatory framework to protect the public is not protective of other species, and, in the absence of such evidence, the effort to develop separate standards is likely to detract from ongoing efforts to improve, integrate, and harmonize the current protective framework. The Commission believes that proceeding with this effort, which is intended to provide increased assurance that the present system of protection is functioning adequately, is not an effective use of limited resources. Moreover, the development of unnecessary requirements would detract from more urgent and risk-significant efforts that would actually increase radiological protection. Should, however, IAEA and ICRP continue to pursue the development of such standards, the NRC will participate only to the extent necessary to ensure that our opinion on this matter is heard and to ensure that individual nations have great flexibility to decide what, if any, additional measures need to be implemented. The NRC will not expend significant research funds on this activity.

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The Commission encourages you to assist us in ensuring that international standards activities remain focused on outcomes that provide demonstrable benefits to protection of public health and safety and the environment.

Sincerely,

***/RA/***

Nils J. Diaz

cc: Roger Clarke, ICRP

May 18, 2004

Professor Roger H. Clarke, Chairman  
International Commission on Radiological Protection  
SE-171 16 Stockholm  
Sweden

Dear Professor Clarke:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am writing to express the Commission's support for the development of an international radiation protection framework that includes standards that are realistic, workable, and risk-informed. In this regard, we value the long history of cooperation between the NRC, the International Commission on Radiological Protection (ICRP), and the International Atomic Energy Agency (IAEA) and continue to support your efforts to improve, integrate, and harmonize the existing international radiation protection framework.

The Commission believes that the limited resources available to address key radiation protection issues should be applied to activities that are likely to provide a demonstrable improvement in protection of public health and safety and the environment. For example, since the events of September 11, 2001, the international community, with leadership from the IAEA, has made progress in increasing the security of civilian radioactive sources through development of the "Code of Conduct on the Safety and Security of Radioactive Sources." Similarly, ICRP and IAEA efforts to prevent high-dose rate brachytherapy accidents are also focused on improving practices in industrialized and developing nations so as to avoid potentially severe accidents.

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***/RA/***

Nils J. Diaz

cc: Abel Gonzalez, IAEA