



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
ADVISORY COMMITTEE ON NUCLEAR WASTE  
WASHINGTON, DC 20555 - 0001

ACNWR-0241

June 8, 2006

The Honorable Nils J. Diaz  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-001

SUBJECT: COMMENTS ON ICRP DRAFT DOCUMENT - SCOPE OF RADIATION  
PROTECTION REGULATIONS (SPRING 2006 VERSION)

Dear Chairman Diaz:

At its 170<sup>th</sup> meeting, the Committee was briefed by the NRC staff on the International Commission on Radiological Protection (ICRP) Draft Document "The Scope of Radiation Protection Regulations" (ICRP, 2006). The NRC staff is preparing general comments and specific technical comments. The staff plans to transmit those comments to the ICRP. The Committee supports the direction and content of the staff's comments as reported during the meeting.

The Committee believes that this ICRP document does not add value to the radiation protection programs in the United States, especially those promulgated by the Commission for its licensees and for licensees in Agreement States. The Committee also believes that there are inconsistencies between this ICRP draft document and the terminology used in U.S. laws, regulations, and implementing guidance. These inconsistencies could lead to significant confusion in radiation protection programs and practice in the United States. Therefore the Committee believes that this draft document in its present form is not useful for further consideration without substantial revision and alignment with other ICRP draft guidance documents.

Sincerely,

**/RA/**

Michael T. Ryan  
Chairman

Reference:

ICRP (International Commission on Radiological Protection), 2006. Draft report titled, "The Scope of Radiological Protection Regulations," Editor J. Valentin, February 2005 – spring 2006 version, available at: [http://www.icrp.org/docs/Scope\\_of\\_rad\\_prot\\_draft\\_02\\_258\\_05v06.pdf](http://www.icrp.org/docs/Scope_of_rad_prot_draft_02_258_05v06.pdf).

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