



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

ACNWR-0259

February 28, 2007

The Honorable Dale E. Klein  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: COMMENTS ON "DRAFT RECOMMENDATIONS OF THE INTERNATIONAL  
COMMISSION ON RADIOLOGICAL PROTECTION," DATED JANUARY 12, 2007

Dear Chairman Klein:

The Advisory Committee on Nuclear Waste has consulted with the U.S. Nuclear Regulatory Commission (NRC) staff on the latest draft<sup>1</sup> of the International Commission on Radiological Protection (ICRP) document, "Draft Recommendations of the International Commission on Radiological Protection," dated January 12, 2007. The Committee understands that the staff's comments are in the concurrence process before transmission to ICRP.

Although ICRP did not allow sufficient time for a comprehensive review of these draft recommendations, the Committee believes that the NRC staff has performed a thorough review<sup>2</sup> and that its comments are appropriate. Although the staff recognizes improvements in this draft compared to previous drafts, it concludes that problems remain.

The following two issues are noteworthy:

- (1) ICRP relied on unpublished reports and data as a basis for its recommendations. This is a poor practice. The Committee believes that the staff should advise ICRP accordingly.
- (2) The Committee supports the staff view that it is not necessary to develop a radiation exposure standard for nonhuman species.

The Committee prepared this short letter to offer its independent review of, and agreement with, the staff comments so that the Commission would have the benefit of the Committee views before the ICRP comment deadline. Furthermore, the Committee concurs with the staff conclusion<sup>2</sup> that "there may be no compelling public health and safety argument to change NRC regulations..." based on the current draft of the ICRP recommendations<sup>1</sup>.

Sincerely,

**/RA/**

Michael T. Ryan  
Chairman

References:

1. Draft Recommendations of the International Commission on Radiological Protection, January 12, 2007 ([http://www.icrp.org/docs/ICRP\\_Draft\\_Recommendations\\_12\\_January\\_2007.pdf](http://www.icrp.org/docs/ICRP_Draft_Recommendations_12_January_2007.pdf)).
2. Draft NRC staff comments (February 2007) on the January 12, 2007 Draft Recommendations of the International Commission on Radiological Protection.

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**DOCUMENT NAME:** C:\FileNet\ML070600286.wpd

<b>OFC</b>	ACNW	ACNW	ACNW	ACNW
<b>NAME</b>	NColeman	ADias	FGillespie	MRyan
<b>DATE</b>	2/28/07	2/28/07	2/28/07	2/28/07

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