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The Honorable Lando W. Zech, Jr.  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: ACRS COMMENTS ON THE DEVELOPMENT OF RADIATION PROTECTION  
STANDARDS

During the 331st meeting of the Advisory Committee on Reactor Safeguards, November 5-7, 1987, we met with Floyd L. Galpin, Office of Radiation Programs, U.S. Environmental Protection Agency (EPA), and Robert E. Alexander, Office of Nuclear Regulatory Research, U.S. Nuclear Regulatory Commission (NRC), to discuss current developments related to radiation protection standards. These discussions included reports on the efforts of (1) EPA to establish individual dose rates for members of the public that would be considered to be "below regulatory concern" (BRC), and (2) an interagency committee, coordinated by EPA with NRC support, that is engaged in developing guidance for federal agencies on radiation protection of the public. These topics were also subjects of discussion by our Waste Management Subcommittee during its meeting on October 15-16, 1987.

Current EPA efforts are being directed primarily to developing limits on dose rates from low-level radioactive wastes, including the development of dose rates that are BRC, for members of the public. Several proposals on this topic from outside organizations have been reviewed and endorsed by the EPA's Science Advisory Board. As such, this work holds promise for alleviating some of the problems being encountered in the management and disposal of such wastes.

Although these efforts have revealed inconsistencies in existing radiation protection standards (which will require considerable efforts to resolve), and although problems remain (such as clarifying distinctions in dose rates considered to be BRC and those considered to be de minimis), we are very encouraged by these activities. They hold promise, not only of providing a coherent system of radiation protection standards, but also of placing the risks from low radiation dose rates in better perspective.

For these reasons, we recommend that the NRC continue its support of and lend encouragement to the work of the interagency committee and the related efforts of the EPA.

Sincerely,

William Kerr  
Chairman

