

D860716

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

Dear Mr. Zech:

SUBJECT: ACRS COMMENTS REGARDING SUPPORT OF RADIATION PROTECTION ORGANIZATIONS SUCH AS THE NATIONAL COUNCIL ON RADIATION PROTECTION AND MEASUREMENTS (NCRP), THE INTERNATIONAL COMMISSION ON RADIOLOGICAL PROTECTION (ICRP), AND THE NATIONAL ACADEMY OF SCIENCES (NAS)

By his letter of July 1, 1986, the EDO responded to our May 13, 1986 letter to Chairman Palladino on the subject matter (copies attached). We most certainly agree with his comment that the assessments provided by the NCRP, the ICRP, and the NAS of the significance of the results of ongoing research concerning the effects of exposures to various types of radiation delivered to various parts of the body are important to NRC's mission. Indeed, these assessments are basic and provide the most authoritative information available for the agency's decisions as to the levels of protection needed over a wide range of circumstances.

In addition, it should be noted that the range of activities of the NCRP, for example, extends far beyond assessments of the biological effects of ionizing radiation. Other NCRP program areas include the movement, transport, and behavior of radionuclides within the environment, procedures for environmental radiation surveillance, nuclear emergency planning, radionuclide contamination limits, and occupational and environmental radiation protection. You might recall, for example, that it was the NCRP that provided a definitive evaluation of the potential impacts of the release of krypton-85 from the containment at Three Mile Island, Unit 2, following the accident at that plant.

As the EDO also pointed out, in the past, the NRC has supported these efforts to assimilate and codify the most recent information bearing on the effects of radiation. Purely as a matter of bookkeeping convenience [since this activity is neither initiated nor controlled by the Office of Nuclear Regulatory Research (RES)], the funds for such support have, in the past, been included within the RES budget. But it is the agency -- and not RES, nor any particular division of the agency -- which has an essentially primordial need for the information in question. To argue that, because funds for the research activity of the agency have been subjected to such major budgetary reductions, there is no longer room in the RES budget to accommodate this support -- which may well be correct -- ought not lead to the decision to drop such support; but ought, instead, to lead to efforts to find the mechanism whereby the agency can continue to help with the development of the information it needs. Parenthetically, it is obvious that no division of the agency can be expected to take the funds for such a broad purpose out of its own budget.

Obviously, also, the resources available to the agency as a whole have been curtailed. According to the EDO, this has resulted in placing "primary emphasis" on the inspection and enforcement programs, as well as on other "program needs." Amongst the latter is the unquestionable need of ascertaining the cause, sequence, and consequences of the Chernobyl accident, and the determination of what the implications of this may be with respect to U.S. regulatory policies and practices. However, these "program needs" are evidently somewhat flexible, as indicated by the intention expressed in SECY-86-185, "Program Plan for Chernobyl Accident Followup," of also inquiring into the Chernobyl geology, and the design features to accommodate seismic, tornado, and flood loads, the Soviet use of simulators, etc., etc., etc. -- items of interest, no doubt, but items having little if anything to do with the cause and progress of the accident, or with the implications for U.S. practice.

Thus, even in the context of a stated level of support, the "program needs" admit of some flexibility -- in addition to the need of allowing for the possibility that support levels could change. In the radiation protection area, the "primary emphasis on inspection and enforcement" could, of course, continue for years on the basis of existing data and regulatory dicta; but, to the extent possible, it ought to adapt to the best current information available. The acquisition of such information is a prerequisite to having these activities proceed on the most rational basis possible.

The Committee believes that there are many areas within RES, as well as the remainder of the Commission's program, whose funding could be reduced by the amount necessary to provide support to these organizations with a relatively small loss compared to the substantial gains to the Commission from the studies conducted by these groups.

In conclusion, while we think we understand the EDO's position, we believe much more strongly that this position should be changed. An integral part of the agency's mission should be that of supporting efforts to obtain the information which it needs.

Sincerely,

David A. Ward
Chairman

Attachments:

1. Letter from Victor Stello, Jr., Executive Director for Operations to David A. Ward, Chairman, ACRS, regarding NRC funding for independent scientific advisory groups, dated July 1, 1986
2. Letter from David A. Ward, Chairman, ACRS, to N. J. Palladino, Chairman, NRC, Subject: Support of Radiation Protection Organizations, dated May 13, 1986

→