

POOR ORIGINAL

COMMENTS ON NUREG-0511

First let's agree that "considerable uncertainties...exist in the health risk estimators used." (p. 4) However, to contend that this document has produced estimates of the "worst-case" (p. 1-2) is an unquestionable distortion.

- 1.) Projections are limited to the year 2000 which severely limits the potential health impacts. (ch. 6)
- 2.) In fact, it is admitted that "the approach taken in developing risk estimators...has been to place conservative bounds on the health effects from the U.S. uranium mining-milling industry." (G-58)
- 3.) Further, in the case of dose equivalent to the bronchial epithelium disputed assumptions are accepted which potentially underestimate risk. (C-4)

Other factors limiting the validity of NUREG-0511 include:

- 1.) Data in NAS BEIR III not included in this document. (G-58)
- 2.) Any reliance on the repeatedly discredited Wash-1400 radiation risk estimates. (G-58)
- 3.) An inability to translate radon concentrations into potential inhalation doses. (C-4)
- 4.) The fact the plume depletion is complex and not thoroughly understood. (G-16)

In the context of the crucial uncertainties and assurances in NUREG-0511 that health impacts will be minimal several conclusions can be postulated:

- 1.) NUREG-0511 provides an unrealistic estimate of health impacts.
- 2.) NUREG-0511 may have significantly underestimated health impacts.
- 3.) NUREG-0511 promotes uranium mining and milling by choosing to employ assumptions minimizing the potential impacts.

RECOMMENDATIONS

- 1.) The most important position NUREG-0511 can take regarding health impacts is that they are, in fact, quite unknown.
- 2.) Risk of health impacts should be presented in the tables in range fashion (NOT AS A FOOTNOTE INDICATING THE ACTUAL IMPACT MAY BE TWICE WHAT IS REPRESENTED IN THE TABLE-p.6) honestly attempting to develop the worst-case possible without time restrictions. This is not to say the best-case should not also be criticized and defended. In fact, a minimum of five health impact scenarios should possibly be analyzed and compared.
- 3.) The range assigned to health impact should be as wide as possible rather than assumptively narrowed.

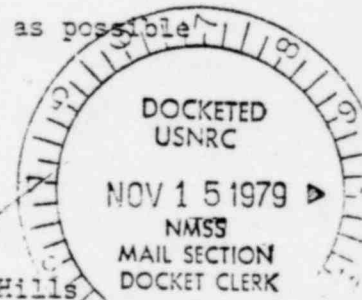
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