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Your reference

Our reference DDG/9/101/78

Date 22 March 1979

Mr J Hendrie
Chairman
US Nuclear Regulatory Commission
Washington DC 20555
USA

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Dear Mr Hendrie

I was sorry to see the views attributed to your staff by Nucleonics Week, March 15, 1979, on the subject of ICRP Publication 26. I realise, of course, that the views attributed to your staff are not necessarily accurate, but the misconceptions are sufficiently important for me to feel that I ought to write to you about them.

The particular phrase that worries me is the one concerned with ICRP "going in the wrong direction", with the implications that ICRP Publication 26 represents a relaxation from previous recommendations. For external radiation, which is the predominant source of exposure throughout all occupations, including reprocessing, the new recommended dose limits are either the same or more stringent than earlier ones. For internal exposure the numbers are not directly comparable because the previous limits apply to individual organs regardless of the number of organs involved, whereas the present system of limitation involves an addition of risk in different organs. In principle, there might be some relaxation for those nuclides which irradiate essentially only one organ. However, I know of no situations in this country, and I suspect there is none in yours, where internal exposure to radionuclides essentially irradiating only a single organ takes place at levels of exposure which are restricted by the dose limits rather than by the more stringent requirement to keep all exposures as low as reasonably achievable.

It is of course true that no country is committed to accepting the ICRP recommended dose limits and the choice of dose limits is currently under discussion throughout the European Community and, I imagine, wider. What worries me is the suggestion that departing from ICRP's dose limits implies a rejection of ICRP Publication 26. As that document makes clear, the dose limits are a very small part of a much more substantial system of dose limitation. I personally have no doubt whatever that this system of dose limitation will underlie radiation protection in Europe. Indeed, it already underlies radiation protection in both our countries. I worked closely with regulatory staff of what was then AEC in ensuring that the concept of ALARA became a practical procedure rather than just a concept, and as this is one of the corner stones of ICRP Publication 26 I would very much regret to see the United States turning its back on the International Commission.

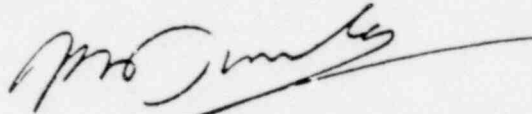
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It may well be that all of this is an unnecessary worry on my

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part because the sources available to Nucleonics Week may not be all that reliable. I understand that Andrew McLean is visiting your organisation in the next few weeks and no doubt he will be able to identify and clarify any differences between us. For this reason I am copying my letter to him and also to John Gaunt in our Embassy.

Yours sincerely



H J DUNSTER
Director of Nuclear Safety

1023 186