



OFFICE OF THE
SECRETARY

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

July 22, 1980

Ellyn R. Weiss, Esq.
Sheldon, Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Re: Natural Resources Defense Council
Petition on Occupational Radiation
Exposure Standards

Dear Ms. Weiss:

This is in response to your request for information regarding possible Commission action on this matter.

At the present time, the NRC believes it should not take independent action on your petition. Several significant matters are now pending which could influence any NRC reconsideration of occupational radiation exposure standards. Among these are the long awaited third report by the committee on biological effects of ionizing radiation (BEIR III), proposed guidance on occupational radiation exposure standards expected to be issued by the Environmental Protection Agency (EPA) pursuant to its Federal Radiation Council authority (FRC), and a report by the Radiation Policy Council task force on occupational health protection.

EPA has completed its draft of proposed FRC guidance and intends to circulate it to the interagency task group for comments in the week of July 21. On that basis, all the concerned agencies will have the document for approval before the end of July; EPA will publish its proposed guidance in August 1980, and by January 1981, EPA, NRC, and the Occupational Safety and Health Administration (OSHA) expect to initiate a joint hearing on that guidance. If that guidance is approved by the President, it will be implemented by the NRC.

In view of these significant ongoing activities, the NRC believes that independent action in this area would be ill-advised. Moreover, the NRC does not believe that the majority of evidence supports the contention that immediate action is required to protect public health and safety. Although some studies have indicated that radiation may be likely to cause greater biological effects than previously thought, these studies are controversial and at variance with a substantial body of scientific opinion. As the NRC-sponsored public meeting between Drs. Bross and Rothman clearly demonstrated, opinions differ on the validity of the research methods and statistical analyses used in these studies. The NRC is continuing its review of research on radiation risk and is funding a study which will determine the feasibility of new research on human effects from exposure to radiation.

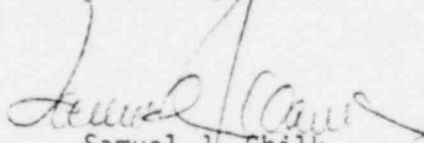
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For these reasons, the NRC believes that independent action on your petition is not warranted at this time. However, the NRC recognizes that this joint hearing process has already taken longer than anticipated and that this matter deserves prompt consideration. Therefore, if there is any further slip in the schedule such that a joint hearing could not be held by January 1981, the NRC will consider holding independent hearings on the issues raised in your petition.

Sincerely,

A handwritten signature in cursive script, appearing to read "Samuel J. Chilk".

Samuel J. Chilk
Secretary of the Commission