



CHAIRMAN

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

December 22, 1989

The Honorable J. Bennett Johnston, Chairman
Committee on Energy and Natural Resources
United States Senate
Washington, D. C. 20510

Dear Mr. Chairman:

I am responding to your November 13, 1989 request for the Nuclear Regulatory Commission's (NRC's) views on S. 972, the "Radiation Research Reorganization Act of 1989". This legislation would transfer the responsibility for conducting epidemiological studies of the effects of exposure to radiation from the Department of Energy (DOE) to the Department of Health and Human Services (HHS).

Over the years this agency has taken differing positions regarding which Federal agency should administer the radiation health effects research program. The NRC's prime concern is not where the epidemiological research program is centered, but that the Federal government maintains a strong radiation health effects research program to provide NRC with information needed to support its regulatory program.

The NRC is aware of efforts by DOE and the National Academy of Sciences to review the substance and the organizational structure of DOE's radiation research program. As a result of these reviews, numerous improvements have been made in DOE's radiation research program. The NRC supports improvements in the current program as we rely on DOE research in several important areas.

In particular, NRC and DOE have worked closely to develop a jointly funded and managed program on improving radiation protection measurements in areas such as personnel dosimetry, bioassay, air sampling and survey instrumentation. In addition, efforts are currently underway to determine the feasibility of merging cellular and molecular effects assessments with epidemiology assessments in order to reduce the uncertainty in radiation health risk estimates. Another major ongoing program is DOE's long term analysis of radiation health effects in the Japanese population exposed to nuclear blasts at Hiroshima and Nagasaki. This project will continue to generate the major data base upon which risk projections rest. A new effort of great interest to NRC is confirmatory research to support risk assessments at low doses and low dose rates. It is critical to the NRC that decisions regarding administration of the national effort in radiation health effects research assure that these projects are continued at recommended levels of support and without interruption.

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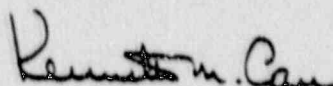
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In addition to these Department of Energy programs, the Nuclear Regulatory Commission continues to need recommendations on estimates of radiation health effects from organizations such as the National Academy of Sciences and the National Council on Radiation Protection and Measurements. Their recommendations on such topics as occupational and public dose limits and methods for calculating health effects provide the technical basis for NRC's radiation protection regulations, guidance, and reviews. It is essential that recommendations from national advisory groups continue to rest on a technically sound, peer reviewed and accessible data base.

For the foregoing reasons, the current arrangement for conduct of epidemiological studies on the effects of exposure to radiation has proven to be workable and the Commission supports retaining this arrangement. If Congress decides to alter this arrangement, the Commission wishes to emphasize that whatever agency administers the funds for research in radiation health effects, it is critical that the technical credibility of the epidemiological data base be maintained and that progress continues in resolving uncertainties associated with radiation exposure risks.

If you or other Committee members have additional questions on this matter, please do not hesitate to contact me.

Sincerely,


Kenneth M. Carr

cc: Senator James A. McClure