



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

AUG 20 1990

MEMORANDUM FOR: FILE

FROM: Douglas M. Collins, Chief
Emergency Preparedness and
Radiological Protection Branch
Division of Radiation Safety
and Safeguards

SUBJECT: TELECON FROM MR. OWEN HOFFMAN OF OAK RIDGE NATIONAL
LABORATORIES (615-576-2118) ON AUGUST 10, 1990

Mr. Hoffman called to provide a comment of concern for consideration at the public meeting on BRC. Mr. Hoffman performs risk assessment for Superfund sites for the EPA.

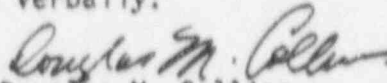
He noted that under the BRC policy allowing 10 mrem a year to individuals from disposal of contaminated materials, the disposal site would exceed the acceptable risk factor for Superfund sites. He noted that the March 9, 1990, Federal Register notice for Superfund sites established risk factors for site cleanup. The "targets" of a lifetime risk under these rules should not to exceed 10 E-6 and, under no circumstances, would a 10 E-4 risk be tolerated. These risk factors were for the maximally exposed individual.

Mr. Hoffman stated that the 10 mrem per year criteria, in the policy statement, over 70 years, exceeds these EPA risk factors. Thus, materials could be defined as BRC and disposed of according with NRC policy and yet would have to be cleaned up under Superfund.

He noted arguments provided by the policy were "risk-based", yet risk comparisons were mostly to natural background. He said such comparisons did not consider incremental risk. He contended that the risk comparisons should be made to those used by EPA for all carcinogens including radioactive materials under Superfund regulations. His basic questions was, "Why has the NRC chosen to regulate risk under BRC in a manner inconsistent with criteria required by EPA under Superfund?"

I brought to Mr. Hoffman's attention that as an interim policy, the NRC will limit dose from an activity to 1 mrem per year to the maximally exposed individuals. In addition, I noted that the NRC had been working with EPA during development of BRC Policy and that I was confident those involved developing the Policy were aware of Superfund criteria. Mr. Hoffman stated that he was more comfortable with the interim policy dose criteria which were in concert with IAEA standards. I also noted that the NRC had sought public input to the Policy via Advance Notice of Proposed Rulemaking in the Federal Register and at an international conference on the issue last fall. I also noted that this was a Policy and that any changes to regulations would be available for public review and comment.

Mr. Hoffman stated that he would be unable to attend the public meeting and would like an answer to the issue as part of the record of public meeting. He said he did not think he needed to take the time to submit the question in writing since he had given it to me verbally.


Douglas M. Collins