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

DEC 01 1989

Mr. Warren J. LaBeau
Monroe County Board of Commissioners
125 East Second Street
Monroe, MI 48161

Dear Mr. LaBeau:

Your letter of November 6, 1989, transmitted a resolution adopted by the Monroe County Board of Commissioners urging the Nuclear Regulatory Commission (NRC) not to redesignate or reclassify any low-level radioactive waste as being "below regulatory concern" (BRC). I would like to take this opportunity to respond to the concerns raised by the Board of Commissioners, because the NRC believes that reasonable application of the BRC concept can result in optimal use of resources applied to public health and safety issues.

As the resolution states, there exists some concern relative to the health effects of exposure to low levels of radiation. The basis for this concern originates with the fact that, at high doses and dose rates, radiation has been shown to cause an increased incidence of various forms of cancer. This relationship has been derived, in large measure, from studies of the Japanese atomic bomb survivors. The data has then been cautiously used to estimate hypothetical health effects which may be attributable to radiation exposures involving low doses and dose rates, and specifically for those potential exposures related to BRC waste disposals. In making this estimate, however, one should keep sight of the fact that any exposures to BRC waste will represent only a small fraction of the total which we all receive from naturally occurring background radiation. By way of further comparison, the exposures would typically be less than that additional increment which an individual would receive from cosmic radiation during a cross-country plane flight.

These and other perspectives have led the Congress and the NRC to the conclusion that an acceptably small level of calculated hypothetical risk can be defined below which the resources of the NRC and its regulated community are better spent on more important radiation protection issues. Very likely the Board of Commissioners has made similar public health decisions on a wide variety of Monroe County issues.

Regarding the Board's second concern, I would point out that in assessing the potential radiological risks from BRC waste disposals, the design and operating features of the disposal facility will be taken into account. As a result, I expect that if any BRC waste disposals are approved, they will include provisions identifying appropriate disposal facilities.

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Mr. Warren J. LaBeau

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As the Board may be aware, the NRC has issued the enclosed statement of policy with regard to BRC waste disposals. We are also currently formulating a broad-based policy defining the rationale for any exemption decision that would allow radioactive material to be transferred from a controlled to an uncontrolled status. This policy would also state the criteria and conditions which must be satisfied.

If the Board has any further questions or concerns, or needs for additional information, please let me know.

Sincerely,

Original Signed By
Themis P. Speis

Joe Eric S. Beckjord, Director
Office of Nuclear Regulatory Research

Enclosure:
As stated

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