Mr. David Minnaar Michigan Department of Public Health Division of Radiological Health P. O. Box 30195 3423 North Logan Lansing, Michigan 48909

Dear Mr. Minnaar:

This is a follow-up to our recent telephone discussion during which you inquired about the Nuclear Regulatory Commission position regarding monitoring health effects in the vicinity of low-level waste disposal facilities.

The NRC has adopted no formal position regarding the direct monitoring of health effects in the vicinity of nuclear facilities. The agency has instead developed a regulatory framework, 10 CFR Part 61, that mandates direct environmental sampling as an indicator of proper facility performance. Part 61 requires that a low-level waste facility licensee implement an environmental monitoring program that provides data to evaluate the potential health and environmental impacts associated with a low-level waste disposal facility and to develop the plan for taking corrective measures if migration of radionuclides is indicated. Part 61 requires preoperational monitoring to establish natural background radiation levels, operational monitoring to verify site performance and assure worker protection, and post operational monitoring to verify the absence of radiological releases for the long term. I have included for your information a copy of the NRC draft technical position related to environmental monitoring in the vicinity of low-level waste disposal facilities in 10 CFR Part 61.

As you are aware, monitoring health effects associated with the extremely low-levels of radiation that would be characteristic of a low-level radioactive waste disposal facility would be a rigorous, resource intensive exercise that would have a low probability of yielding significant results. Sample populations would have to be extremely large and control parameters extremely rigorous in order to produce any statistically significant results. This is explained in more detail in the attached testimony related to releases of slightly contaminated tritiated water from Three Mile Island.

The National Cancer Institute (NCI) has undertaken a study related to the monitoring of health effects in the vicinity of nuclear power plants. I have included the study protocol and a list of references for your information as you address the issue of monitoring health effects in the vicinity of a low-level waste disposal facility.

8907250298 890721 PDR WASTE WM-3 PDC If you have any further questions on this matter, please call me or $\mbox{Jim Shaffner at (301) } 492-3450.$

Sincerely,

ORIGINAL SIGNED BY

Paul H. Lohaus, Chief Operations Branch Division of Low-Level Waste Management and Decommissioning, NMSS

Enclosures: As stated

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