



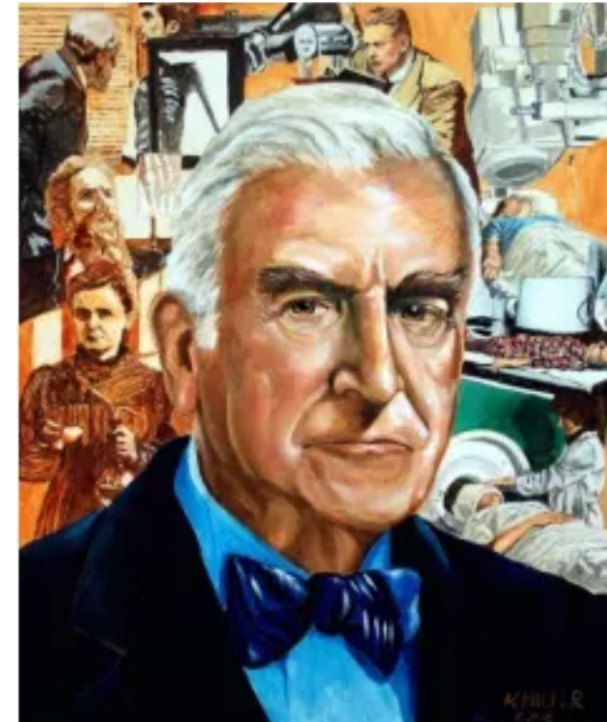
**National Council on Radiation
Protection & Measurements**

**NCRP Comments on Enhancing NRC's Radiation
Protection Framework
In Response to Executive Order 14300 Section 5(b)
July 16, 2025**

**Kathryn A. Higley, PhD, CHP, HPS Fellow
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President, National Council on Radiation Protection &
Measurements**

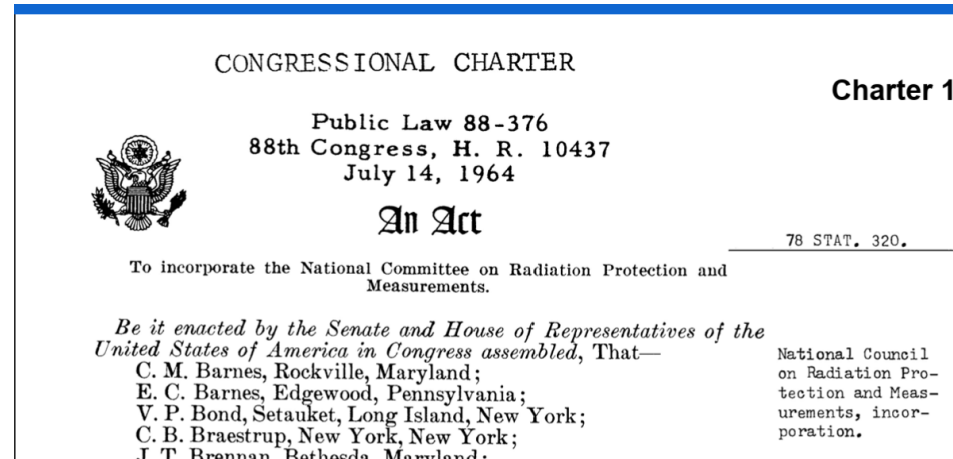
The History of NCRP

- Founded by Congress in 1964 (Public Law 88-376)
- Evolved from the 1929 Advisory Committee on X-Ray and Radium Protection. First President Lauriston Taylor
- Mission: Provide guidance on radiation protection and measurements
- Longstanding advisory role to NRC and other federal agencies



NCRP's Congressional Charter

- Develop & disseminate radiation protection recommendations



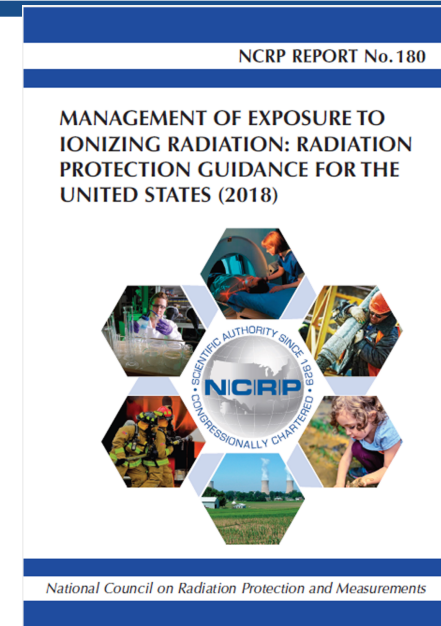
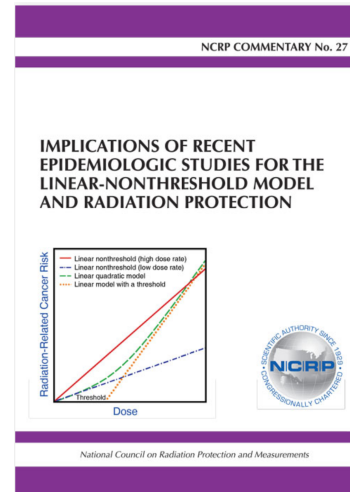
- Collaborate with national & international organizations
- Provide guidance on topics such as ALARA and LNT
- Support regulatory decision-making

NCRP's Support of NRC Over the Decades

- 1980s–1990s: Input on worker reporting requirements
- 1994: Helped develop NRC's Radiation Exposure Information and Reporting System (REIRS)worker registry
- 2012–present: Analysis of worker dose data (as part of Million Person Study)
- Issued guidance on lens of the eye dose limits

NCRP Reports in Support of NRC

- Report No. 180: Comprehensive Radiation Protection Guidance for Workers, the Public, and the Environment
- Commentary No. 27: Scientific basis for LNT



- Provided input on petitions regarding LNT model (Federal Register documentation)

The Million Person Study (MPS)

- Launched early 2000s by NCRP
- Studies >1 million U.S. workers and veterans
- Focus: Chronic, low-dose radiation exposure
- Includes atomic veterans, power plant, medical, and weapons workers

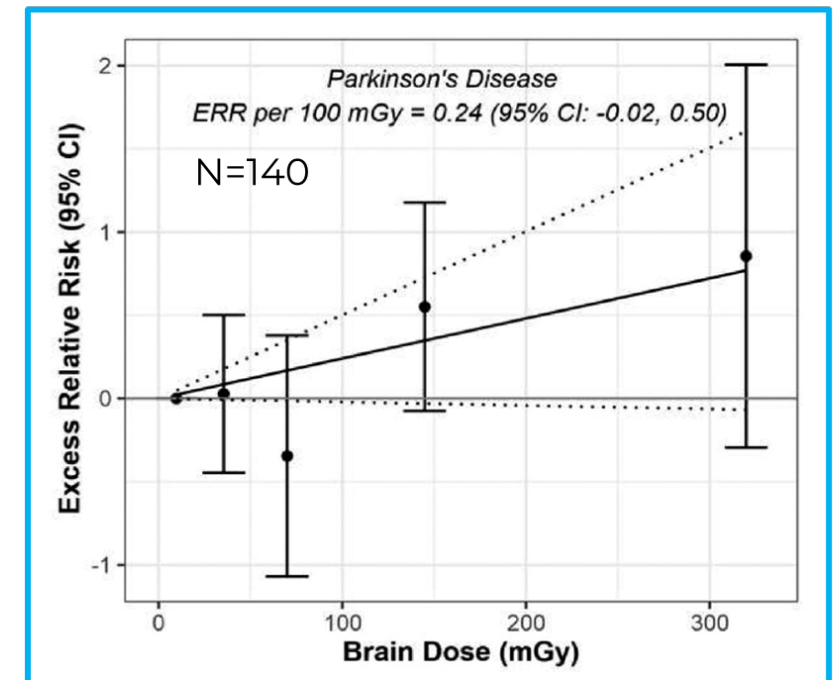


MPS and Public Health Impact

- Addresses cancer **and noncancer** outcomes (e.g., cardiovascular disease, neurodegenerative disorders, cognitive decline)
- Improves dose-response estimates
- Enhances understanding of long-term, low-level exposures
- Strengthens scientific foundation for dose limits

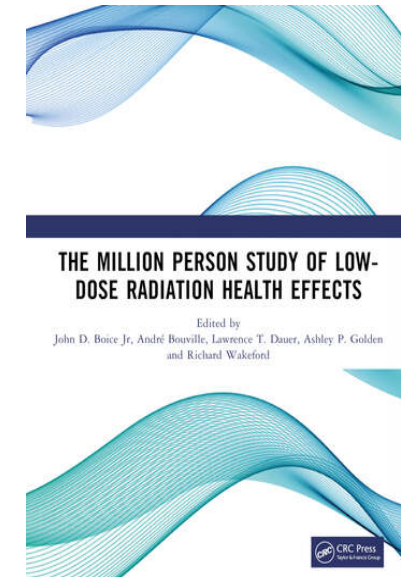
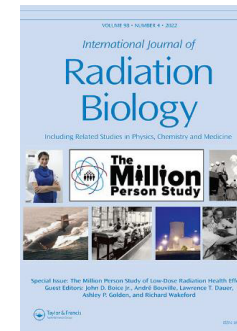
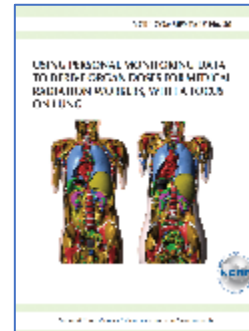
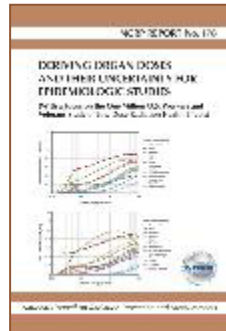
Nuclear Power Workers

Mean 33.2 mGy, Max 834 mGy



Rigorous Methods, Transparency & Public Data Access

- Retrospective cohort design with linked health records
- Uses Medicare/Medicaid data for noncancer endpoints
- Over 100 peer-reviewed publications
- Public data archive at DOE's Comprehensive Epidemiology Data Resource (CEDR)



NCRP's Approach to Stakeholder Topics

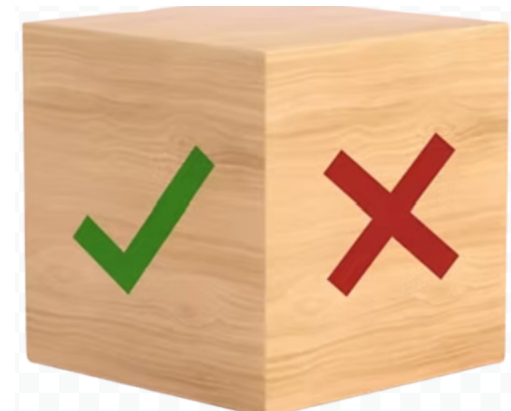
- Consensus-driven recommendations by 100 expert Council Members and other technical volunteers
- Commitment to revisiting guidance as science evolves
- ALARA guidance (Report No. 107)
 - Balances dose reduction with need for clear imaging
- Report No. 180:
 - Revised ALARA under 'optimization of protection'
 - Emphasizes considering societal, economic, and environmental factors
 - NCRP can revisit to ensure all factors are appropriately valued

NCRP's Position on LNT

- Nearly 25 years ago: Report No. 136 (2001):
 - LNT prudent and science-based
- 2018: Commentary No. 27
 - 29 epidemiological studies reviewed; reaffirmed LNT
 - No superior alternative model currently available for low dose and low dose rate exposures
 - Pragmatic and protective
- Willing to revisit if requested by NRC, as 7 years have elapsed
 - Can incorporate insights from MPS

NCRP Guidance on Negligible Dose

- NCRP has considered a dose 'floor'
- Report No. 116: 0.01 mSv (1 mrem) annual dose as negligible
- Revisited in Report No. 180
- NCRP is ready to re-examine this recommendation at NRC's request





NCRP's Continued Commitment

- Decades of independent, scientifically grounded, consensus-based guidance
- Ready to assist NRC in addressing EO 14300
- Ensuring policies reflect current science and protect public health





**National Council on Radiation
Protection & Measurements**

Thank You