

# Conference of Radiation Control Program Directors, Inc.

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Lisa Bruedigan

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January 22, 2026

The Honorable Ho Neih, Chairman  
And Members of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: CRCPD Statement of Concern and Request for Engagement Regarding EO 14300  
Section 5(b) and 10 CFR Part 20

Dear Commissioners,

On behalf of the Conference of Radiation Control Program Directors (CRCPD), I am writing to provide comments and express concerns regarding the Nuclear Regulatory Commission's (NRCs) on going reevaluation of the Linear No-Threshold (LNT) model and the as low as reasonably achievable (ALARA) principle pursuant to Executive Order 14300, Section 5(b), with relevance to 10 Code of Federal Regulation (CFR) Part 20.

CRCPD offers these comments in the spirit of partnership and cooperation, consistent with our organizational objectives to promote uniformity in radiation protection programs and to support effective, efficient implementation of federal regulatory policy across the states. We recognize the complexity of the task before the NRC and appreciate the opportunity to share the state regulatory perspective.

### **Alignment with NRC Mission and Principles of Good Regulation**

CRCPD recognizes and supports the NRC's revised mission statement, including its commitment to protecting public health and safety while not unnecessarily restricting beneficial uses of radiation. In this context, we believe it is essential to underscore that changes to foundational radiation protection concepts—particularly the ALARA and linear non-threshold (LNT) models—have implications well beyond NRC materials licensees.

CRCPD also notes that the NRC's Principles of Good Regulation, include openness, clarity, reliability, and independence, emphasizing the importance of seeking and considering a full range of stakeholder perspectives. Where regulatory changes will have national, long-term consequences, early engagement with those responsible for implementation is essential to achieving effective and resilient outcomes.

### **Scope and Impact of Potential Changes to 10 CFR Part 20**

Although the current reevaluation focuses on materials regulation, 10 CFR Part 20 functions as a foundational framework for radiation protection across the United States. Any substantive modification to ALARA or LNT within Part 20 is likely to affect:

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- State equivalents to 10 CFR Part 20;
- Agreement State compatibility requirements;
- Dose-based table values for emissions and discharges;
- Radiation-producing machine programs, including X-ray, that rely on Part 20 concepts as a regulatory basis;
- Medical, industrial, and transportation sectors regulated outside the NRC.

Medical X-ray use alone affects a substantially larger portion of the U.S. population than radioactive materials regulated directly by the NRC. Even where alternative regulatory approaches may be theoretically available, Part 20 has long served as a unifying reference point for radiation protection programs nationwide. As a result, changes of this magnitude will have cascading impacts across regulatory systems.

The United States is widely recognized as a global leader in radiation protection. Significant changes to its foundational regulatory philosophy have the potential to influence international standards and practices, with implications extending beyond U.S. borders.

### **Compatibility, Harmonization, and International Considerations**

CRCPD is particularly concerned about the implications of potential changes to Part 20 for regulatory compatibility and international harmonization. Many U.S. standards align with international frameworks, including:

- International Commission on Radiation Protection (ICRP) recommendations, which most Western countries and all European Union member states follow (e.g., 20 mSv/year averaged over five years for occupational exposure);
- International Atomic Energy Agency (IAEA) standards, which inform U.S. Department of Transportation regulations in 49 CFR governing nearly all aspects of radioactive material transport.

A departure from these harmonized, dose-based protection concepts could create discord with international partners, complicate interstate and international commerce, and introduce unintended regulatory and economic consequences.

### **Role and Value of the ALARA Principle**

CRCPD wishes to emphasize that ALARA remains a critical safety principle, independent of scientific debate regarding the LNT model.

ALARA provides an essential margin of safety by discouraging routine operation at regulatory dose limits. Without ALARA, licensees may operate consistently at those limits, increasing the likelihood of dose exceedances and constraining regulators' ability to intervene effectively. Importantly, the concept of "reasonable" has always incorporated cost considerations, and economic efficiency has long been part of ALARA implementation.

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CRCPD is concerned that removing ALARA while also reconsidering LNT could result in higher routine occupational and public exposures, increased dose exceedances, and reduced regulatory flexibility. These outcomes may not be fully anticipated at this stage of the reevaluation.

### **Scientific Basis and Appropriate Authorities**

CRCPD does not assert technical authority to determine the scientific validity of LNT or alternative dose response models. Accordingly, CRCPD believes that any changes to foundational radiation protection principles should be grounded in recommendations from the National Council on Radiation Protection and Measurements (NCRP), as chartered by Congress under Public Law 88-376 (July 14, 1964).

We acknowledge that Executive Order 14300 imposes time constraints that limit the development of new scientific research. However, changes of this magnitude should ultimately rest on a robust, peer-reviewed scientific consensus that is transparent and accessible to regulators, stakeholders, and the public.

### **Stakeholder Engagement and State Participation**

CRCPD recognizes that formal stakeholder engagement requirements may differ across rulemakings. Nonetheless, we are concerned that state radiation control programs are not currently represented in the ALARA/LNT reevaluation efforts under EO 14300, despite participation in other NRC rulemakings.

States are responsible for implementing and maintaining compatibility with NRC regulations and bring critical operational insight into how regulatory changes function in practice. CRCPD's request is not for preferential access, but for meaningful engagement consistent with past practice and with the shared goal of effective and efficient regulation.

### **CRCPD's Intent and Request**

CRCPD does not seek to oppose NRC rulemaking, delay its schedule, or advocate for a particular scientific model. Rather, we respectfully request:

- Meaningful engagement of state radiation control programs in the ALARA/LNT reevaluation process;
- Clear communication regarding the scope and intent of any proposed changes to 10 CFR Part 20;
- Consideration of compatibility, implementation challenges, and unintended consequences across both the materials and X-ray programs;
- Continued collaboration to ensure uniform, protective, and practical radiation regulation nationwide.

CRCPD remains committed to supporting the NRC's mission and values its longstanding partnership with the agency. We stand ready to work collaboratively with the NRC to ensure that any future regulatory

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changes are scientifically sound, internationally aligned, and effectively implementable across all jurisdictions.

Thank you for your consideration of these comments and for your continued engagement with state radiation control programs.

Sincerely,



Patrick Mulligan  
CRCPD Chairperson

CC: Chairman Ho K. Nieh  
Commissioner David A. Wright  
Commissioner Bradley R. Crowell  
Commissioner Matthew J. Marzano  
Commissioner Douglas W. Weaver

## **NRCExecSec Resource**

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**From:** Lisa Bruedigan <lbruedigan@crcpd.org>  
**Sent:** Friday, January 23, 2026 7:45 AM  
**To:** NRCExecSec Resource  
**Cc:** patrick.mulligan@dep.nj.gov  
**Subject:** [External\_Sender] CRCPD Statement of Concern and Request for Engagement Regarding EO 14300 Section 5(b) and 10 CFR Part 20  
**Attachments:** Letter to NRC\_EO14300 01.22.2026.pdf

Dear Chairman Neih and Members of the Commissioners,

On behalf of the Board of Directors of the Conference of Radiation Control Program Directors (CRCPD), I am attaching a letter regarding the ongoing concerns CRCPD and our members have regarding the Nuclear Regulatory Commission's (NRCs) ongoing reevaluation of the Linear No-Threshold (LNT) model and the as low as reasonably achievable (ALARA) principle pursuant to Executive Order 14300, Section 5(b), with relevance to 10 Code of Federal Regulation (CFR) Part 20.

It is our sincere hope that this letter receives the proper attention so that the necessary measures can be taken to ensure any future changes are scientifically sound, internationally aligned, and effectively implementable across all jurisdictions.

We respectfully request acknowledgment of receipt within five days.

Sincerely,

*Lisa Bruedigan*

Executive Director  
Conference of Radiation Control Program Directors

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