

August 23, 2006

MEMORANDUM TO: Luis A. Reyes  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS - SECY-06-0168 - STAFF COMMENTS  
ON THE DRAFT RECOMMENDATIONS OF THE  
INTERNATIONAL COMMISSION ON RADIOLOGICAL  
PROTECTION

The Commission has approved the staff's proposed comments on the draft 2006 recommendations of the International Commission on Radiological Protection (ICRP), subject to the comments provided below. The staff should take a lead role in discussing these comments at the NEA/ICRP Forum later this month.

1. The Commission endorses radiological protection recommendations that can enable tangible improvements in providing for adequate protection of public health and safety, and that can be implemented by practitioners and regulatory authorities in a practical, timely, and cost effective manner. Therefore, the Commission supports the Advisory Committee on Nuclear Waste's assessment that "this ICRP document does not add value to the radiation protection programs in the United States, especially those promulgated by the Commission for its licensees and for licensees in Agreement States", and the staff's assessment that since there has not been any significant change in radiation risks, there is no compelling public health and safety argument to make any changes to the recommendations, or to national regulations that implement those recommendations.
2. The Commission specifically notes (as previously documented in the SRM on SECY-04-0223) that it is not necessary to develop a framework for radiological protection of non-human species, and Section 10 of the draft recommendations should be removed. The staff should continue to express the Commission's opposition to developing standards for protection of flora and fauna to the ICRP and IAEA in the appropriate forums.
3. The Commission strongly supports the staff's view that ICRP should not propose any numerical values that could be used as the basis for terminating a pregnancy and agree that such discussion (paragraph 263) should be removed from the ICRP recommendations document. This issue should be emphasized in a standalone general comment, as follows: "The NRC believes that discussions regarding the termination of pregnancy are beyond the scope of the ICRP's mission. Such discussions should be held on case-by-case bases between competent medical practitioners and their patients, and it is therefore inappropriate for the ICRP to propose any numerical value that could be the basis for terminating a pregnancy."

4. The Commission believes that the ICRP should be encouraged to provide stronger statements to further discourage misuse of the collective dose concept and to provide recommendations on the limited appropriate uses of collective dose. The ICRP needs to provide clear guidance with numerous examples of when it is appropriate to use collective dose and, more importantly, when it is not appropriate to use collective dose.
5. The staff should continue to support the open process that ICRP is using to gather feedback from the many groups interested in the development of these recommendations. Coincident with the upcoming NEA/ICRP Forum, the staff should urge domestic stakeholders, particularly States, industry and professional organizations, and public interest groups to submit their comments on the recommendations directly to the ICRP.
6. The Commission supports the Advisory Committee on Nuclear Waste's (ACNW) view that ICRP should not adopt a new set of tissue weighting factors and nominal risk coefficients until the assessment of the atomic-bomb data is completed and published. Additionally, the staff should continue to challenge ICRP to 1) clearly describe the technical basis for its decisions and to incorporate peer-reviewed scientific information that reflects the current state of knowledge and 2) delay finalizing the draft 2006 recommendations until the ICRP stated objectives have been fulfilled.
7. The staff should continue to monitor the DOE Low Dose Radiation Research, and the ICRP and other ongoing radiation protection activities to understand the boundaries of our scientific knowledge of low dose radiation effects.
8. The staff should address the following specific comments before providing them to ICRP:
  - Comments 60 and 61 provide an adequate discussion of a specific problem(s), but they do not provide the corrections the staff desires to be made to the report. The staff needs to be clear what they want done to address the issue.
  - Comment 76 clearly indicates what the staff wants accomplished in the report but provides no justification for the action. Some type of brief justification should be provided.
  - For Comment 78, the first two sentences are clear but the third sentence needs some type of lead in phrase to connect it to the idea in the first two sentences. Otherwise the third sentence is an apparent abrupt change in thought. A possible revision of the third sentence is "As an example, U.S. materials ...".

cc: Chairman Klein  
Commissioner McGaffigan  
Commissioner Merrifield  
Commissioner Jaczko  
Commissioner Lyons  
OGC  
CFO  
OCA  
OPA  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
PDR