

From: Brian Richter
To: Melinda Malloy
Date: 8/14/03 2:10PM
Subject: EDO Control: G20030479 OMB Request for Views on Sect. 418
Place: FAST

Melinda,

The following is in response to Trip Rothschild's e-mail seeking NRR's response to OMB's request for NRC views on Sec. 418 of H.R. 2861. It has been reviewed by David Matthews and is being sent at his request.

The Nuclear Regulatory Commission (NRC) approach to the use of monetary values for health impacts is described in the "Regulatory Analysis Guidelines of the U.S. Nuclear Regulatory Commission," NUREG/BR-0058, Rev. 3, Final Report, July 2000. The Guidelines describe how the NRC measures health impacts from the amount of radiation exposure using a conversion factor of \$2000 per person-rem. Revision 2 of the Guidelines defined this conversion factor "... as the product of the dollar value of the health detriment and a risk coefficient that establishes the probability of health effects as a result of low doses of radiation. In the NRC's formulation, the value of the latter term is on the order of 7×10^{-4} per rem and includes allowances for fatal cancers, nonfatal cancers, and severe genetic effects." That version of the Guidelines then went on to explain "For the dollar valuation of the health detriment, the NRC has adopted \$3 million as a representative value. This estimate is consistent with OMB's best estimate and an extensive literature review performed by the NRC. The resulting \$2000 conversion factor was derived by multiplying these two factors (7×10^{-4} and \$3 million), and expressing the result with one significant digit."

As a result, the NRC does not use monetary values for adult premature mortality that differ based on the age of the adult. Therefore, NRC's regulatory policies would not be affected at all if the proposed section 418 were applied to the NRC.

If you have any questions, please contact Brian Richter at 415-1978.

CC: Beverly Sweeney; David Matthews; David Skeen; FAST; Trip Rothschild