

Honorable Lando W. Zech, Jr.
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Zech:

SUBJECT: ADDITIONAL RECOMMENDATIONS ON THE DEVELOPMENT OF DE MINIMIS
LEVELS

During its 315th meeting, July 10-12, 1986, the Advisory Committee on Reactor Safeguards gave additional consideration to procedures that might be used in the development of de minimis radiation dose values for regulatory use. This matter was also discussed during a combined meeting of our Subcommittees on Occupational and Environmental Protection Systems and on Auxiliary Systems held on June 27, 1986.

As a result of these discussions, we offer the following additional comments and recommendations:

1. Additional review and discussions need to be held to determine whether the development of de minimis values is justified. Included in such a review would be studies to determine, as far as practical, the risks (health effects) and benefits (economic savings) associated with the application of such a concept.
2. If initial studies determine that the development of de minimis dose values is justified, the development of the rationale to support the selected dose levels should be made an integral part of the overall effort.
3. To assure the acceptability of the numerical value recommended, we believe that the deliberations suggested above should be conducted by a scientific body, as contrasted to a regulatory agency. Since determination of such levels will involve a wide range of considerations, including an evaluation of the risks and benefits associated with all methods for generating electricity, we believe that the organization selected to conduct these studies should have a "global" outlook. One example of such an organization is the National Academy of Sciences.
4. If the suggested studies lead to the development of de minimis values, careful consideration should be given as to how they should be applied within the regulatory framework.

Although the development of de minimis values is of importance to the NRC, other Federal agencies have equal interests in this matter. We suggest that the NRC consider taking the lead in joining with other appropriate Federal agencies to follow through on this issue.

Sincerely,

David A. Ward
Chairman

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