

JAN 30 1997

Mr. Michael H. Mobley, Director
Division of Radiological Health
Tennessee Department of Environment
and Conservation
3rd Floor, L & C Annex
Nashville, TN 37243-1532

Dear Mr. Mobley:

This replies to your December 31, 1996, letters to Chairman Jackson and Commissioners Rogers, Dicus, Diaz and McGaffigan which provided comments on the November 22, 1995 draft "EPA/NRC Risk Harmonization White Paper."

We agree with you that EPA's air emissions standard is not more protective than NRC's air emissions standard. The section you quote on page 15 of the White Paper is entitled, "Different exposure scenarios are used in some programs." As one example, the paper says that, under National Emissions Standards for Hazardous Air Pollutants, "the scenarios addressed by EPA are more extensive." While one could infer that this means that EPA's standard is more stringent, we agree with you that such an inference would be incorrect. Such an inference was not intended. Elsewhere in the paper, it is made clear that, "The agencies usually achieve similar levels of protection, despite fundamental differences in approaches."

We also agree that it is inaccurate to describe EPA's drinking water standard as being simply 4 mrem/year. The paper repeats this common error on page 22. As you stated, the standard actually corresponds to a range of dose limits that vary by radionuclide, and there is no standard for some radionuclides.

Thank you for your interest in risk harmonization. We will forward both of your comments to the ISCORS Risk Harmonization Subcommittee. For your information, Robert Nelson, at (301) 415-7298, is NRC's risk harmonization technical contact.

Sincerely,

Original signed by Carl J. Paperiello

Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 30, 1997

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Tennessee Department of Environment
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Sincerely,

Carl J. Paperiello
Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

✓23 Informed Patty/EDO
that OSP would like to add
a few sentences to NM558
close out this letter.

EDO Principal Correspondence Control

FROM: DUE: / /
Michael H. Mobley, State of Tennessee

EDO CONTROL: G970023
DOC DT: 12/31/96
FINAL REPLY:

TO:
Chairman

OR SIGNATURE OF : ** GRN **

CRC NO: 97-0017

DESC:

ROUTING:

COMMENTS ON EPA/NRC RISK HARMONIZATION WHITE PAPER
BEING REVIEWED BY ISCORS

Callan
Jordan
Thompson
Norry
Blaha
Bangart, SP
Morrison, RES

DATE: 01/10/97

ASSIGNED TO:

CONTACT:

NMSS

Paperiello

SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action

1-15-97

Kathaleen:

SP please acknowledge per King. Mobley wrote
a letter to the Chairman and each Commissioner, so
please reference all of them. Thanks.

Margo

ACB

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-97-0017 LOGGING DATE: Jan 6 97

ACTION OFFICE: EDO

AUTHOR: MICHAEL MOBLEY
AFFILIATION: TENNESSEE

ADDRESSEE: CHAIRMAN JACKSON

LETTER DATE: Dec 31 96 FILE CODE:

SUBJECT: COMMENTS TO A NOV. 22, 1995 EPA/NRC RISK
HARMONIZATION WHITE PAPER

ACTION: Appropriate

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