



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

PDR

March 11, 1986

The Honorable William V. Roth, Jr., Chairman
Committee on Governmental Affairs
United States Senate
Washington, D. C. 20510

Dear Senator Roth:

Last year you requested our comments on proposed bill S.525, "Radiation Reorganization Act of 1985." Comments on the bill sent by our General Counsel, Herzel H. C. Plaine, endorsed the transfer of radiation epidemiology research programs from the Department of Energy to the Department of Health and Human Services which would be accomplished by S.525. This position reflected prior NRC endorsement of the 1979 recommendations from Joseph Califano, then Secretary of the Health, Education and Welfare, to the President concerning radiation research authorities.

Because of the importance of this issue, the Commission itself decided to reexamine the merits of S.525. The Commission sees little benefit to be gained by transfer of ionizing radiation epidemiological research programs from the Department of Energy to the Department of Health and Human Services. Hence, the Nuclear Regulatory Commission does not support enactment of S.525.

Our current position is based in part upon the existence of the Committee on Interagency Radiation Research and Policy Coordination (CIRRPC) which was created in 1984. This organization operates under the aegis of the Office of Science and Technology Policy within the Executive Office of the President and has provided a strong central focus for coordination of radiation issues, including radiation health related research. The CIRRPC furnishes a means for interagency review and input into the development of Federal radiation research projects rather than relying solely upon a single agency to plan this research.

Transfer of the human epidemiological studies from DOE would separate this research from related animal research on radiation injury mechanisms at DOE. The current DOE epidemiology program seems to be adequately supported and technically well managed. The program is reviewed by a scientific advisory panel and the results are openly published in peer-reviewed journals. These factors support DOE retention of this research at this time. The continued support of these activities at their current levels may pose problems due to budgetary constraints. However, the DOE may provide a more stable funding level than other

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agencies to which this research might be transferred. This is a critical consideration in light of the long-term nature of epidemiological research.

It should be noted that the provisions of S.525 do not immediately impact upon the Nuclear Regulatory Commission or its programs. However, regardless of where the responsibility for this research is assigned, a mechanism for considering the special information needs of regulatory agencies is required. The Commission believes that the Committee on Interagency Radiation Research and Policy Coordination can fulfill this requirement, so that modifications to the institutional arrangements for the research program at this time are not needed. While finding that the transfer of authority would serve little useful purpose, the Commission encourages other agencies, such as the Department of Health and Human Services, to augment the work performed by DOE in the area of radiation epidemiological studies, consistent with such agencies' special statutory responsibilities.

Commissioner Asselstine believes that public health oriented agencies, such as the NIH, are best suited to have primary responsibility for radiation effects research, including epidemiological studies. Consequently, he would prefer the reorganization proposed in S.525 to the current situation.

Sincerely,


Nunzio J. Palladino