



Department of Energy
Washington, DC

December 13, 2002

Dr. Jack Valentin
Scientific Secretary
International Commission on
Radiological Protection
ICRP-SE-17116
Stockholm, Sweden

Dear Dr. Valentin:

The U.S. Department of Energy (DOE) appreciates the opportunity to provide comments on the International Commission on Radiological Protection (ICRP) Task Group report, "Protection of Non-Human Species from Ionizing Radiation" (ICRP reference 02/305/02). The comments provided are based on our experiences and lessons learned in developing methods and dose rate guidelines within a graded approach for evaluating radiation doses to non-human species, our participation in the ICRP Task Group as a designated corresponding member, and our participation in related international meetings and symposia on this topic. General and detailed comments are provided in an enclosure to this letter.

We would like to commend the ICRP for its initiative to re-examine its 1997 assumption that "...if man is adequately protected then other living things are also likely to be sufficiently protected." We understand that the ICRP Task Group was established with the aim of developing a policy and framework for protection of non-human organisms. The Task Group's report gives the radiation protection community a good starting point for discussing the need for a revised policy statement and supporting implementation framework for non-human organisms. However, we believe that the Task Group's recommendation that the ICRP Main Commission approve and proceed with a complex, comprehensive biota research and dosimetry development program is premature.

We recommend that the Task Group first conduct an assessment of where, under what exposure scenarios, and to what degree the current system of radiation protection for man may not be protective of the environment. From this assessment, the degree to which a new ICRP comprehensive dosimetry development program for non-human species is warranted can be determined. Alternative approaches and paths forward, to include the development of a general, performance-based framework that would allow the use of biota dose evaluation methods and models already available and in use by several countries, should also be evaluated and presented as options to the ICRP Main Commission.

Finally, if a general framework for environmental radiation protection is advanced by the ICRP, we believe that an important component should be the inclusion of screening

levels - levels of radioactivity or radiation dose that are clearly not harmful to non-human species under bounding conditions - within a graded or tiered assessment approach. Such a generic screening level approach is common to many regulatory programs and can quickly and cost-effectively eliminate from further consideration those contaminants which pose no harm to the environment while allowing resources to be directed towards those contaminants having the potential to put non-human species at risk.

We thank you again for the opportunity to offer comments on the report and look forward to our continuing participation in this ICRP initiative as a corresponding member to the Task Group. If you have any questions concerning these comments, please contact Mr. Stephen Domotor of my staff (stephen.domotor@eh.doe.gov).

Sincerely,

A handwritten signature in cursive script that reads "Andy Lawrence".

Andy Lawrence
Director
Office of Environmental Policy and Guidance

Enclosure