



Organization of Agreement States

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The letter was addressed and sent individually to the Chair and Ranking Member of the following Committees on January 30, 2009:

House of Representatives:

Committee on Appropriations  
Committee on Homeland Security  
Committee on Energy and Commerce  
Committee on Oversight and Government Reform  
Committee on Science and Technology  
Committee on Ways and Means  
Committee on Education and Labor

Senate:

Committee on Appropriations  
Committee on Environment and Public Works  
Committee on Homeland Security and Governmental Affairs  
Committee on Health, Education, Labor and Pensions

Dear \_\_\_\_\_:

We the undersigned Agreement State Radiation Control Program Directors are writing about an issue that is very important to the health and welfare of the people in this country. The issue is the lack of a comprehensive, coherent national radiation control program. The federal level, at present, has numerous agencies having some responsibility regarding radiation. However, there is no national standard for all sources of radiation and there is no national program charged with the protection of the public from all radiation sources. As a result, federal agencies pressure the states, most of which have comprehensive radiation programs, to provide protection from certain sources of radiation while ignoring other sources. The result of this can be expressed no better than the statement by the federal Committee on Interagency Radiation Research and Policy Coordination in its 1988 report when it stated: *"The number of standards applicable to a given source appears to be inversely proportional to the contribution of the source to the exposure of the population."* They conclude with: *"A cursory review of the legal and technical facts contained in many of the basic U.S. radiation protection standards suggests that the standards are numerous and complex, principally control activities that make relatively small contributions to the overall U.S. population dose, have become more restrictive over time, and follow no common rationale in achieving public health objectives."*

This is exactly the perspective our state radiation control programs have relative to the federal effort. The federal effort focuses on well-regulated radiation sources while spending little or no effort on those actually affecting the public health. As a result, the states find themselves driven by the federal level to expend precious resources trying to emulate federal directives while those sources not addressed by these same federal agencies continue to expose the public.

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*Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Washington, Wisconsin*

This is a serious problem, forcing our programs to evolve into expending more effort protecting the public from a potential hypothetical exposure than we expend to protect them from the actual exposures they are receiving.

The attached paper serves as a background document for the proposal that:

- 1) A single federal agency be charged with the development of a comprehensive radiation protection policy such that national radiation protection standards are consistent across all controllable exposure pathways and radiation sources and;
- 2) a single federal agency be charged with the establishment of national radiation protection standards.

Radiation control program directors are trained to prevent the exposure of the public to all unnecessary sources of exposure from ionizing radiation. However, it is a difficult chore without a national radiation policy for this great country.

We request you review this issue and initiate action to resolve this lack of a national radiation policy that addresses all radiation sources in the United States of America.

Sincerely,

Kirksey Whatley, Director  
Alabama Office of Radiation Control

Jared W. Thompson, Program Manager  
Radioactive Materials Program  
Arkansas Department of Health

Jeffrey P Meyers, LEM  
Division Administrator  
Radiation Control Program Director  
Emergency and Radiological Services Division  
Louisiana Department of Environmental Quality

Beverly O. Hall  
Section Secretary  
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Rhode Island Department of Health  
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Tennessee Department of Environment and  
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Gary Robertson, Director  
Washington State Department of Health  
Division of Environmental Health  
Office of Radiation Protection