



Radiation Cancer Prevention Standards Should be Set by Independent Agency, Not Congress

July 13, 1999

Dear Senator,

The undersigned organizations and individuals that are devoted to the prevention of cancer adamantly oppose S. 1287, the Nuclear Waste Policy Amendments Act of 1999. Our objections are a result of Sec. 103, Radiation Protection Standard, which attacks the cancer prevention standard of Yucca Mountain, Nevada, a proposed nuclear waste dump. We oppose the rollback of cancer prevention standards that are necessary to prevent increases in cancer for the population surrounding Yucca Mountain. We believe that Sec.103 attacks the basic concept of cancer prevention and sets a dangerous precedent. Our specific concerns are:

Radiation cancer prevention standards should be set by an independent agency with significant scientific expertise without political interference from Congress. Current law requires the Environmental Protection Agency (EPA) to set a cancer prevention standard for Yucca Mountain. EPA has finished their draft standard and has sent it to Office of Management and Budget as a draft rulemaking. However, S. 1287 blocks EPA from setting this standard. Instead, S. 1287 sets strict boundaries for the Nuclear Regulatory Commission to set the standard within. Qualified scientists and doctors should set cancer prevention standards, not Senators.

The cancer standard within S. 1287 is equivalent to a 50-millirem annual exposure, which is at least twice as high as other standards. However, the National Academy of Sciences has recommended that such a standard be set within a 2 to 20 millirem annual exposure. Proponents of this legislation justify the increased exposure by comparing it to natural background radiation (an average annual exposure of 360 millirem). But this is a false comparison and is equivalent to comparing apples to oranges. It is scientifically accepted that background radiation causes cancer. As such, the purpose of a cancer prevention standard is to prevent additional cancers resulting from manmade sources. Exposure to an additional 50 millirems creates a deadly precedent.

Health standards are established to protect people. The typical standard is set to protect all but 1 in 10,000 to 1 in 1,000,000 people. S. 1287 sets a considerably less protective risk-based standard at one excess cancer death for every 1,000 individuals exposed over a lifetime. This reduced level of protection is morally unacceptable.

The standard in S. 1287 is actually much worse than it appears on the surface. Health protection standards for both radiation and toxins have always been set to protect those most likely to be exposed to the hazard. By protecting those at the highest risk, we achieve a high confidence that the entire population is protected. However, the standard set by S. 1287 violates this sacred doctrine, by mandating that the standard be set to the average critical member of the population. This permits the masking of higher levels of exposure because they are mixed in with those who receive less exposure. The resulting risk is three times greater for the citizens who are above this average.

The use of an average member of the critical group in S. 1287 does nothing to protect the most vulnerable citizens, which include children and pregnant women. Any new cancer prevention standard must provide protections for our most cherished citizens.

S. 1287 jeopardizes a critical natural resource for Nevadans. The expected migration of radionuclides from Yucca Mountain will contaminate a single groundwater aquifer, which is the sole source of water for people, crops and livestock near the site. This is a large aquifer capable of supplying drinking water to 250,000 people. Since this ground water is the most likely pathway for exposure, any cancer prevention standard must protect this essential resource with a strong drinking water standard. S. 1287, to the contrary, prohibits a groundwater based cancer protection standard. This is unacceptable as future generations will rely on the limited water supply and must be protected from the unnecessary risks of cancer.

We must reduce the causes of cancer in our society; not permit new ones. Please support the basic concept of protecting our society from cancer and oppose S. 1287.

Sincerely,

Organizations

American Medical Students Association, Reston, VA

Breast Cancer Action, San Francisco, CA

Cancer Awareness Coalition, New Paltz, NY

Cancer Resource Center, San Francisco, CA

Greater San Francisco Bay Area Chapter Physicians for Social Responsibility, Berkeley, CA

Hawaii Physicians for Social Responsibility, Kailua, HI

Los Angeles Physicians for Social Responsibility, Santa Monica, CA

Maine Chapter Physicians for Social Responsibility, Portland, ME

Marblehead Cancer Prevention Project, Marblehead, MA

New York Black Women's Health Project, Brooklyn, NY

Oregon Chapter Physicians for Social Responsibility, Portland, OR

Physicians for Social Responsibility, Washington, DC

Pioneer Valley Breast Cancer Network, Leeds, MA

UCSF Student Health Professionals for Social Responsibility, San Francisco, CA

Washington Physicians for Social Responsibility, Seattle, WA

Doctors

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David C. Hall, MD, Seattle, WA

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Thomas Hobbins, MD, Baltimore, MD

Judith Litton, MD, Seattle, WA

Frank H. Lucido MD, Oakland, CA

Evan, Kantor, MD, Seattle, WA

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Michael Wenzler, MD, Bloomington, IN

Peter Wilk, MD, Portland, ME

Medical School Students

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