



International Radiation Protection Association

2 November 2017

Hans Menzel
ICRU Chairman

Dear Hans,

ICRP/ICRU Draft Report on Operational Quantities for External Radiation Exposure

IRPA welcomes this opportunity to comment on this draft report. We accept that the report demonstrates that the proposed new approach as presented represents an improved scientific accuracy in the measurement of dose from external radiation, particularly for the lower photon doses.

However, we are disappointed that the report has no discussion whatsoever on the implications for the practical application of the proposed new approach, or even any recognition that there are very real issues and implications in this regard.

IRPA is strongly of the view that organisations which develop international recommendations should always take account of the implications for the practical application of their proposals. Whilst we accept that the report is essentially reporting the outcome of a scientific exercise, it must be accepted that science itself is but one input into the system of protection. The report should as a minimum identify the principal issues in moving towards application in practice.

The IRPA Associate Societies and the Executive Council are aware that the principal concern for practical implication relates to the potentially very significant cost impact of amending measurement instrumentation to take account of the proposed approach. Any perceived benefit from improved scientific accuracy needs to be judged against the direct costs of implementation and any other impacts arising from application.

In other words, just because an approach is scientifically more accurate does not mean that its implementation should be regarded as automatic. There needs to be a period of reflection on this issue, and as a minimum the current report should point to this need and provide an insight and lead into this next important stage of consideration.

I am copying this response to Chris Clement for ICRP, the co-sponsors of the draft document. These comments have also been entered onto the formal consultation website via the ICRP page.

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With best regards

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