

DOCUMENT RESUME

05670 - [B1226195]

EPA Efforts To Guard the Public in a Period of Radiation Proliferation. April 18, 1978. 10 pp.

Testimony before the House Committee on Government Operations: Environment, Energy, and Natural Resources Subcommittee; by Henry Eschwege, Director, Community and Economic Development Div.

Contact: Community and Economic Development Div.
Organization Concerned: Environmental Protection Agency.
Congressional Relevance: House Committee on Government Operations: Environment, Energy, and Natural Resources Subcommittee.

Authority: Atomic Energy Act. Federal Water Pollution Control Act. Marine Protection, Research, and Sanctuaries Act. Toxic Substances Control Act. Resource Conservation and Recovery Act. Safe Drinking Water Act. Clean Air Act Amendments of 1977. Reorganization Plan No. 3 of 1970.

The Environmental Protection Agency (EPA) has broad responsibility to provide Federal radiation guidance for all radiation directly or indirectly affecting health. Much of man's radiation exposure is from unavoidable natural sources as compared to manmade sources. However, further improvements in radiation techniques and controls could reduce exposures. EPA's attempts to implement its responsibilities have resulted in challenges to its authority, and considerable disagreements have occurred in obtaining cooperation with relevant regulatory agencies. To date under its original 1970 authority, EPA has issued only one radiation standard, and it is currently not enforced. In addition, the agency has issued only one new formal guidance document to other Federal agencies. When the issued standard is fully effective in 1978, it will establish new criteria for exposure to the public and limit for the first time the quantities of long-lived radioactive materials entering the environment. The radiation program is sparsely funded and has received very low priority in EPA; it had an annual average budget authority over the past 3 years of about \$5.7 million and an average of 220 positions. As a result of low funding and low priority, morale in the agency's radiation program is low, and EPA officials point to inadequacies in staffing, data, laboratory support, or research as reasons for not being able to do an effective job. EPA should: reexamine its monitoring efforts and develop the capability to provide complete and accurate information on radiation dangers, coordinate research with that of other agencies, and develop an assessment of the scope and need for standards and guidance. (RRS)

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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

FOR RELEASE ON DELIVERY
EXPECTED AT 10 A.M. EST
TUESDAY, APRIL 18, 1978

STATEMENT OF
HENRY ESCHWEGE, DIRECTOR
COMMUNITY AND ECONOMIC DEVELOPMENT DIVISION

BEFORE THE
SUBCOMMITTEE ON ENVIRONMENT, ENERGY, AND NATURAL RESOURCES
HOUSE COMMITTEE ON GOVERNMENT OPERATIONS

ON

EPA EFFORTS TO GUARD THE PUBLIC IN
A PERIOD OF RADIATION PROLIFERATION

MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE:

WE ARE HERE TODAY AT YOUR INVITATION TO DISCUSS OUR JANUARY 1978 REPORT TO THE CONGRESS ENTITLED "THE ENVIRONMENTAL PROTECTION AGENCY NEEDS CONGRESSIONAL GUIDANCE AND SUPPORT TO GUARD THE PUBLIC IN A PERIOD OF RADIATION PROLIFERATION." MY STATEMENT WILL HIGHLIGHT THE MAJOR FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS IN THAT REPORT AS WELL AS RECENT DEVELOPMENTS.

OVERALL, WE REPORTED THAT THE EPA'S RADIATION PROTECTION PROGRAM HAS NOT BEEN FULLY EFFECTIVE NOR HAS IT ACCOMPLISHED ITS GOAL OF SETTING ENVIRONMENTAL STANDARDS AND PROVIDING GUIDANCE FOR PROTECTING THE PUBLIC HEALTH AND ENVIRONMENT. THE AGENCY WAS PROVIDED WITH UNCLEAR OVERVIEW AUTHORITY AND AS A RESULT, ITS ACTIVITIES IN THE RADIATION AREA ARE PLAGUED BY JURISDICTIONAL CHALLENGES TO ITS AUTHORITY; BY LIMITED COOPERATION FROM OTHER AGENCIES; AND BY THE LOW PRIORITY PLACED ON RADIATION PROTECTION.

IN ORDER FOR EPA TO BETTER ASSERT ITS ROLE AND PROVIDE IMPROVED PROTECTION, WE RECOMMENDED THAT EPA'S AUTHORITIES BE BETTER DEFINED BY THE CONGRESS. A CLEARLY DEFINED AND MANDATED EPA ROLE, NECESSITATING POSSIBLE REALIGNMENT OF AGENCY ROLES AND BETTER ALLOCATION OF RESOURCES WOULD REDUCE THE CONFUSION AND CONFRONTATIONS WHICH CURRENTLY EXIST. EPA OFFICIALS RECOGNIZE THE JURISDICTIONAL CHALLENGES TO THEIR AUTHORITY AND AGREE THAT CONGRESSIONAL CLARIFICATION WOULD BE VALUABLE.

RADIATION DANGER

EPA ESTIMATES THAT EACH YEAR THOUSANDS MAY CONTRACT CANCER OR GENETIC DISEASE AS A RESULT OF EXPOSURE TO RADIATION. MUCH OF MAN'S RADIATION EXPOSURE IS FROM UNAVOIDABLE NATURAL BACKGROUND SOURCES AS COMPARED TO MANMADE SOURCES. IT IS RECOGNIZED, HOWEVER, THAT FURTHER IMPROVEMENTS IN RADIATION TECHNIQUES AND CONTROLS COULD REDUCE EXPOSURES. FEDERAL PROTECTION POLICY IS BASED ON THE AXIOM THAT NUCLEAR ENERGY AND THE MEDICAL, AGRICULTURAL, SCIENTIFIC, AND INDUSTRIAL USES OF RADIATION ARE ESSENTIAL FOR HUMAN ADVANCEMENT. THE PROLIFERATION OF EXISTING APPLICATIONS AND THE DEVELOPMENT OF NEW TECHNOLOGY MEAN THAT THE TOTAL SOURCES OF RADIATION ARE INCREASING AND WILL CONTINUE TO INCREASE. EPA CURRENTLY SEES ITS RADIATION RESPONSIBILITY AS BALANCING POTENTIAL DAMAGE TO HEALTH AND THE ENVIRONMENT AGAINST THE BENEFITS OF RADIATION USE. EPA RECOGNIZES THAT NO MATTER HOW LOW THE LEVEL OF RADIATION EXPOSURE, SOME POTENTIAL FOR DAMAGE TO HEALTH AND THE ENVIRONMENT WILL ALWAYS EXIST.

LEGISLATIVE AUTHORITY

EPA'S AUTHORITY IN THE RADIATION AREA IS BASED ON RADIATION PROTECTION RESPONSIBILITIES TRANSFERRED TO EPA FROM THE ATOMIC ENERGY ACT BY EXECUTIVE REORGANIZATION PLAN NO. 3 OF 1970 WHICH CREATED EPA. EPA HAS BROAD RESPONSIBILITY TO PROVIDE FEDERAL RADIATION GUIDANCE FOR ALL RADIATION DIRECTLY OR INDIRECTLY AFFECTING HEALTH. THIS RESPONSIBILITY HAD PREVIOUSLY BEEN CARRIED OUT BY THE FORMER FEDERAL RADIATION COUNCIL. SPECIFIC RADIATION PROTECTION REGULATORY ACTIVITIES ARE CARRIED OUT BY THE VARIOUS AGENCIES UNDER THEIR SPECIFIC AUTHORITY, FOR EXAMPLE, THE REGULATION OF NUCLEAR POWER BY THE NUCLEAR REGULATORY COMMISSION AND THE DEPARTMENT OF ENERGY, WORKER SAFETY BY THE DEPARTMENT OF LABOR, AND PERFORMANCE STANDARDS FOR ELECTRONIC PRODUCTS WHICH EMIT RADIATION BY THE FOOD AND DRUG ADMINISTRATION.

EPA WAS ALSO MADE RESPONSIBLE FOR THE SETTING OF GENERALLY APPLICABLE ENVIRONMENTAL STANDARDS OUTSIDE THE BOUNDARIES OF SITES WHICH POSSESS RADIOACTIVE MATERIALS THAT ARE SUBJECT TO REGULATION UNDER THE ATOMIC ENERGY ACT. TOGETHER, THESE RESPONSIBILITIES GIVE EPA A UNIQUE ROLE AS THE OVERSEER OF RADIATION PROTECTION PHILOSOPHIES, POLICIES, AND CONTROLS FOR THE FEDERAL GOVERNMENT.

SINCE 1970, EPA HAS ALSO RECEIVED SPECIFIC RADIATION AUTHORITY UNDER VARIOUS LAWS. THESE INCLUDE THE

- FEDERAL WATER POLLUTION CONTROL ACT,
- MARINE PROTECTION, RESEARCH, AND SANCTUARIES ACT
- TOXIC SUBSTANCES CONTROL ACT,
- RESOURCE CONSERVATION AND RECOVERY ACT,
- SAFE DRINKING WATER ACT, AND MOST RECENTLY
- CLEAN AIR ACT AMENDMENTS OF 1977.

DELAYS AND OBSTACLES IN ISSUING GUIDANCE AND STANDARDS

EPA'S ATTEMPT TO IMPLEMENT ITS RESPONSIBILITIES HAS RESULTED IN CHALLENGES NOT ONLY TO ITS AUTHORITY BUT ITS TECHNICAL COMPETENCE. CONSIDERABLE DISAGREEMENTS HAVE ALSO OCCURRED IN GETTING COOPERATION WITH THE RELEVANT REGULATORY AGENCIES.

TO DATE UNDER ITS ORIGINAL 1970 AUTHORITY, THE AGENCY HAS ISSUED ONLY ONE STANDARD AND IT IS CURRENTLY NOT ENFORCED. EPA HAS ISSUED ONLY ONE NEW FORMAL GUIDANCE DOCUMENT TO OTHER FEDERAL AGENCIES. IN 1971, EPA BEGAN EXAMINING AS ITS FIRST PRIORITY THE POTENTIAL DANGERS INVOLVED IN THE MANUFACTURING PROCESS OF NUCLEAR ENERGY. THIS PROCESS IS REFERRED TO AS THE URANIUM FUEL CYCLE. WHAT FOLLOWED WERE 6 YEARS OF UNRESOLVED CONFLICTS WITH THE ATOMIC ENERGY COMMISSION, NOW THE NUCLEAR REGULATORY COMMISSION AND THE DEPARTMENT OF ENERGY. REPRESENTATIVES OF THE GENERAL PUBLIC, THE INDUSTRY, PROFESSIONAL GROUPS, AND STATE AND FEDERAL AGENCIES, ALL QUESTIONED WHETHER EPA HAD JURISDICTION. IT WAS ARGUED THAT EPA'S PROPOSED STANDARD WAS WASTEFUL, UNNECESSARY, AND A CONFLICTING DUPLICATION OF EXISTING AUTHORITY. IT WAS ALSO CHALLENGED AS NOT BEING TECHNICALLY SUPPORTABLE, REASONABLE OR CAPABLE OF BEING IMPLEMENTED.

ON THE BASIS OF HEARINGS AND COMMENTS RECEIVED, EPA MADE CHANGES IN THE STANDARD WHICH DELETED THE TRANSPORTATION AREA OF THE URANIUM FUEL CYCLE, EXTENDED THE TIME PERIOD FOR IMPLEMENTATION, AND ALLOWED THE VARIOUS REGULATORY AGENCIES DISCRETION IN GRANTING VARIANCES FROM THE STANDARD. THE FINAL URANIUM FUEL CYCLE STANDARD WAS ISSUED ON JANUARY 13, 1977.

WHEN THE STANDARD IS FULLY EFFECTIVE IN 1983, IT WILL ESTABLISH NEW CRITERIA FOR EXPOSURE TO THE PUBLIC AND LIMIT FOR THE FIRST TIME THE QUANTITIES OF LONG-LIVED RADIOACTIVE MATERIALS ENTERING THE ENVIRONMENT. ADDITIONAL FUEL CYCLE AREAS NOT CURRENTLY COVERED BY THE STANDARD, BUT ONES WHICH SHOULD BE FURTHER ADDRESSED BY EPA INCLUDE THE CRITICAL AREAS OF MINING URANIUM ORE, TRANSPORTING RADIOACTIVE MATERIALS, AND FINALLY DISPOSING OF RADIOACTIVE WASTES.

EPA'S ATTEMPTS IN DEVELOPING PUBLIC HEALTH RADIATION PROTECTION GUIDANCE FOR OCCUPATIONAL AND MEDICAL AREAS HAVE SIMILARLY EXPERIENCED CONSIDERABLE DIFFICULTIES AND DELAYS IN GETTING COMPLETE COOPERATION FROM DEPARTMENTS OF LABOR AND HEALTH, EDUCATION, AND WELFARE (HEW).

BOTH LABOR AND HEW DECLINED TO PARTICIPATE FORMALLY IN INTERAGENCY WORKING GROUPS CHAIRED BY EPA, STATING THAT EPA'S EFFORTS WERE A DUPLICATION OF THEIR X-RAY PROTECTION AND OCCUPATIONAL SAFETY AND HEALTH AUTHORITIES. THEIR POSITION WAS THAT EPA DID NOT HAVE A ROLE IN FEDERAL GUIDANCE FOR MEDICAL OR OCCUPATIONAL RADIATION. HOWEVER, FOLLOWING A JANUARY 1977 AGREEMENT, A JOINT GUIDANCE DOCUMENT WAS FINALLY ISSUED BY EPA AND HEW ON FEBRUARY 1, 1978 DEALING WITH RADIATION PROTECTION GUIDANCE TO FEDERAL AGENCIES FOR DIAGNOSTIC X-RAYS. THE OCCUPATIONAL ISSUE WITH LABOR HAS NOT BEEN RESOLVED AND NO GUIDANCE HAS BEEN ISSUED.

EPA IS ALSO CURRENTLY EVALUATING THE NEED FOR PROTECTION STANDARDS FOR ENVIRONMENTAL NONIONIZING RADIATION EXPOSURES. SIGNIFICANT SOURCES PRODUCING NONIONIZING RADIATION INCLUDE RADIO AND TELEVISION BROADCAST ANTENNAS, RADARS, SATELLITE COMMUNICATIONS SYSTEMS AND MICROWAVE OVENS. EPA WILL DECIDE SHORTLY ON WHETHER PROTECTION STANDARDS ARE NEEDED FOR NONIONIZING RADIATION AND WILL DEVELOP FEDERAL GUIDANCE BY APRIL 1979, IF IT IS DETERMINED NECESSARY.

ALTHOUGH EPA IS CONTINUING ITS EFFORTS ON NONIONIZING RADIATION THIS SUBJECT IS ALSO CONTROVERSIAL. HEW OFFICIALS QUESTION WHETHER EPA CAN ISSUE NONIONIZING RADIATION GUIDANCE, STATING THAT EXISTING EPA AUTHORITY APPLIES ONLY TO NUCLEAR MATERIALS.

THE NEED FOR PROTECTION

RADIATION PROTECTION ISSUES CONTINUE TO BECOME MORE IMPORTANT. FOR EXAMPLE IN 1972 THE NATIONAL ACADEMY OF SCIENCES STATED THAT MEDICAL DIAGNOSTIC RADIOLOGY ACCOUNTS FOR AT LEAST 90 PERCENT OF THE TOTAL MANMADE RADIATION DOSE TO WHICH THE U.S. POPULATION IS EXPOSED. THE ACADEMY CITED ESTIMATES THAT IMPROVED TECHNICAL AND EDUCATIONAL METHODS COULD RESULT IN A 50-PERCENT REDUCTION OF THE "GENETICALLY SIGNIFICANT DOSE."

EPA ALSO ESTIMATED THAT OF THE OVER 22,000 YEARLY POTENTIAL HEALTH EFFECTS OF LEUKEMIA, OTHER FORMS OF CANCER, AND SERIOUS GENETIC DISORDERS AND DISEASES WHICH COULD BE CAUSED BY RADIATION, APPROXIMATELY 8,000 WERE ATTRIBUTED TO RADIATION IN THE HEALING ARTS. EPA BELIEVES THAT AS MANY AS 3,000 CASES PER YEAR COULD BE PREVENTED BY ELIMINATING EXCESSIVE OR UNNECESSARY EXPOSURE TO MEDICAL X-RAYS. EPA SINGLED OUT X-RAYS AS A RADIATION SOURCE IN WHICH A MAJOR, FURTHER REDUCTION IN EXISTING LEVELS OF EXPOSURE WAS POSSIBLE.

SIMILARLY, EPA STATES THAT APPROXIMATELY ONE MILLION AMERICAN WORKERS MAY BE POTENTIALLY EXPOSED TO IONIZING RADIATION. PEOPLE WHO ARE EXPOSED TO RADIATION ON THE JOB FOR EXAMPLE INCLUDE PHYSICIANS, X-RAY TECHNICIANS, NUCLEAR POWER PLANT OPERATORS, URANIUM MINERS, AND FIRE ALARM MAKERS. IT IS IMPORTANT TO KNOW HOW MANY ARE EXPOSED TO HOW MUCH RADIATION, AND WHAT EFFECT EXPOSURE HAS ON THEM. EPA BELIEVES THAT THE ADEQUACY OF EXISTING GUIDELINES, WHICH WERE WRITTEN IN 1960, SHOULD BE REASSESSED.

MORE RECENTLY THE SUBJECT OF NONIONIZING RADIATION HAS ALSO BECOME A NATIONAL CONCERN BECAUSE THE POPULATION IS RECEIVING MEASURABLY INCREASED EXPOSURES. EPA BELIEVES THAT THE POTENTIAL DANGER FROM NONIONIZING RADIATION HAS RISEN DRAMATICALLY SINCE 1945, WHEN LEVELS WERE VERY LOW. EPA ESTIMATES THAT RADIOFREQUENCY AND MICROWAVE SOURCES ALONE ARE INCREASING BY 15 PERCENT ANNUALLY. EXPOSURES TO THE POPULATION ARE BECOMING A MAJOR CONCERN BECAUSE THE HARMFUL ENVIRONMENTAL LEVELS ARE NOT KNOWN, AND THE NUMBER OF SOURCES IS RAPIDLY INCREASING. THE HEALTH EFFECTS OF SUCH EXPOSURES EVEN AT LOW LEVELS HAVE BECOME CONTROVERSIAL. CURRENTLY, THERE IS NO OFFICIAL U.S. ENVIRONMENTAL PUBLIC HEALTH STANDARD FOR EXPOSURE TO NONIONIZING RADIATION SOURCES, BECAUSE RESEARCH PROGRAMS HAVE NOT YET DEVELOPED SUFFICIENT DATA TO ESTABLISH ENVIRONMENTAL STANDARDS FOR MICROWAVE AND OTHER NONIONIZING FREQUENCIES.

STAFFING AND FUNDING DEFICIENCIES

IN TESTIMONY PRESENTED EARLIER THIS YEAR ON THE ADEQUACY OF EPA'S BUDGETARY AND MANPOWER RESOURCES IN CARRYING OUT ITS MISSION, WE REPORTED THAT THE RADIATION PROGRAM IS SPARSELY FUNDED AND RECEIVED VERY LOW PRIORITY IN EPA. EPA'S RADIATION PROGRAM HAD AN ANNUAL AVERAGE BUDGET AUTHORITY OVER THE PAST 3 YEARS OF ABOUT \$5.7 MILLION, AND AN AVERAGE OF 220 POSITIONS. THERE HAS BEEN A GRADUAL DECREASE IN FUNDING OVER THE YEARS FROM A HIGH OF \$8.8 MILLION IN FISCAL YEAR 1972.

EPA GENERALLY RECEIVED FROM THE CONGRESS THE AMOUNTS REQUESTED FROM OMB IN FISCAL YEARS 1976 AND 1977. IN FISCAL YEAR 1978, HOWEVER, EPA'S \$7.8 MILLION REQUEST TO OMB WAS CUT TO \$5.6 MILLION, AND THE CONGRESS FUNDED THAT AMOUNT.

A TOTAL OF \$11.3 MILLION IS REQUESTED FOR FISCAL YEAR 1979. AN INCREASE OF \$5.5 MILLION IS TO BE USED PRIMARILY TO DETERMINE THE APPROPRIATE REGULATORY METHOD FOR CONTROLLING AIRBORNE RADIOACTIVE POLLUTANTS AS REQUIRED BY THE CLEAN AIR ACT AMENDMENTS OF 1977.

AS A RESULT OF LOW FUNDING AND LOW PRIORITY, MORALE IN THE AGENCY'S RADIATION PROGRAM IS LOW AND MOST EPA OFFICIALS INTERVIEWED POINTED TO INADEQUACIES IN STAFFING, DATA, LABORATORY SUPPORT, OR RESEARCH AS REASONS FOR NOT BEING ABLE TO DO AN EFFECTIVE JOB.

RADIATION PROTECTION UNCERTAINTIES

THE ADEQUACY OF RADIATION STANDARDS ARE BEING QUESTIONED BY SOME EXPERTS IN THE FIELD OF LOW LEVEL RADIATION RESEARCH. STUDIES INDICATE THAT THE CURRENT STANDARDS MAY BE FAR TOO HIGH TO INSURE PUBLIC SAFETY. DEMANDS ARE INCREASING FOR A MORE PRUDENT PUBLIC HEALTH POLICY AND FOR REDUCING THE SOURCES OF RADIATION EXPOSURES. ALL SUCH STUDIES ARE UNDER CLOSE SCRUTINY BY BOTH OPPONENTS AND PROPONENTS OF MORE STRINGENT RADIATION PROTECTION.

IT IS IMPERATIVE THAT THE RESPONSIBLE FEDERAL AGENCIES BE ADEQUATELY MANDATED AND SUPPORTED TO ASSURE CREDIBILITY IN RADIATION PROTECTION. EPA IS SPECIFICALLY CHARGED WITH A RESPONSIBILITY TO KNOW HOW PRESENT GUIDANCE IS WORKING, WHAT EFFECT VARIOUS CHANGES WOULD HAVE, AND WHAT ADDITIONAL GUIDANCE IS NECESSARY. ACCORDING TO SOME EXPERTS, HOWEVER, EPA CURRENTLY HAS NEITHER THE SCIENTIFIC LEADERSHIP NOR THE EXPERTISE TO ADEQUATELY PERFORM ITS GUIDANCE ROLE. ALTHOUGH EPA HAS PROVIDED INTERPRETATIONS AND REAFFIRMATIONS OF EXISTING GUIDANCE IN AREAS INVOLVING EXPOSURES TO URANIUM MINERS, FALLOUT INCIDENTS, AND AIRCRAFT CONTAMINATION AND EXPOSURES TO PEOPLE TRAVELING ON AIRCRAFT CARRYING RADIOACTIVE SHIPMENTS, THE ONLY NEW

FORMAL GUIDANCE ISSUED BY EPA WAS THE JOINT EPA/HEW X-RAY GUIDANCE ISSUED IN FEBRUARY 1978.

THE EPA ADMINISTRATOR SHOULD PROVIDE THE RADIATION PROGRAM WITH SUFFICIENT SUPPORT TO DO ITS JOB. ALSO EPA SHOULD:

- REEXAMINE ITS MONITORING EFFORTS AND DEVELOP THE CAPABILITY TO PROVIDE ACCURATE AND COMPLETE INFORMATION ON RADIATION DANGERS,
- COORDINATE ITS IN-HOUSE RESEARCH WITH THAT OF THE OTHER AGENCIES AND WITH OTHER GROUPS AND,
- DEVELOP A COMPREHENSIVE ASSESSMENT OF THE SCOPE AND NEED FOR STANDARDS AND GUIDANCE BASED ON AN EXPLICIT TIME AND PRIORITY DETERMINATIONS OF POTENTIAL RISKS.

TO OVERCOME THE APPARENT CONTROVERSIES REGARDING THE ROLE OF EPA IN DEVELOPING STANDARDS AND FEDERAL GUIDANCE FOR EXPOSURE TO RADIATION, THE CONGRESS SHOULD:

- DEFINE MORE CLEARLY THE AGENCY'S ROLE AS THE FEDERAL OVERSEER OF RADIATION PROTECTION,
- OUTLINE THE SCOPE OF RADIATION DANGERS TO BE ADDRESSED BY THE AGENCY, AND,
- REQUIRE TIMELY DEVELOPMENT OF THE NECESSARY STANDARDS AND GUIDANCE AND PERIODIC ADVISEMENT OF THE AGENCY'S PROGRESS IN MEETING ITS RADIATION PROTECTION GOALS.

EPA RECOGNIZED THE PROBLEMS IN OPERATING A NATIONAL RADIATION PROTECTION PROGRAM AND AGREED WITH US THAT CONGRESSIONAL CLARIFICATION OF ITS AUTHORITIES WOULD BE VALUABLE.

IN SUMMARY, MR. CHAIRMAN, WE BELIEVE THE DIFFICULTIES EPA HAS EXPERIENCED IN CARRYING OUT ITS SPECIFIC AUTHORITIES AND IN STAFFING AND FUNDING ITS RADIATION ACTIVITIES WILL CONTINUE TO IMPACT ON ITS ABILITY TO INSURE RADIATION PROTECTION.

MR. CHAIRMAN, THIS CONCLUDES MY PREPARED STATEMENT. WE SHALL BE GLAD TO RESPOND TO YOUR QUESTIONS.