The need to review low-dose decision-making in radiation protection

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The broad context

But it’s not just the ‘system of protection’ itself – it’s also **how we implement it!**

- As RP professionals
- As regulators

As a profession we are perhaps too cautious – and we are certainly very conservative in our general approaches.

Are we fixated on ‘ever lower doses’ and forever chasing μSvs?
Low Dose Decisions
Around ‘a few mSv’ and lower

The Basic Issue

Why do we allocate significant societal resources to reduce some relatively low exposure levels to even lower levels?

– Such exposures are often well within the variability of natural background, including the consequences of individual day to day decisions
– They make no real difference to the total exposure of any individual
– We are contributing to poor utilisation of societal resources, and risk bringing our profession into disrepute.
– This is at variance with the common-sense way we all live in a radiation environment
An Illustrative Example

Compare and contrast two types of exposure:

Exposure from the clearance system

versus

Exposure from a holiday
The classic example

**Clearance** – the 10 μSv/a criterion
Actually its nearer 0.1μSv/a because of conservatism!
Doses to a very few individuals!
  - up from 2mSv/a to 2.0001mSv/a
It costs many tens/hundreds £M
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Tens of thousands of holidaymakers each year
Each person gets several tenths mSv additional dose
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Is this giving value for money (best use of resources) to society?

Does it align with **Common Sense**?
Common Sense

Definitions:

• The basic level of practical knowledge and judgment that we all need to help us live in a reasonable and safe way.

• Practical judgment that is independent of specialized knowledge, training, or the like.

• The natural ability to make good judgements and behave sensibly.

• Sound and prudent judgment based on a simple perception of the situation or facts.

A VALUE that is perhaps missing from our system?
The context of natural background exposure

- Every person receives at least 2mSv/a:
  - This is the basic minimum (and many receive significantly higher doses)
  - Everything else is an addition to this

- Personal lifestyle decisions add a ‘Delta’ to this:
  - Whether to change house
  - Where to holiday
  - Whether to fly
  - What to eat (..... etc)

This Delta could easily be ± 0.5 mSv or more
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• Such decisions are made daily, with no concern or interest (and usually no knowledge) of radiation risk.
  Rightly so, but ............
The context of natural background exposure

• Natural background exposure at the basic level is classed as ‘existing exposure’ and usually regarded as uncontrollable

• But these ‘Delta’ exposures of individual choice are in principle controllable:
  – Property safety laws: [move house, or holiday accommodation]
  – Risk information laws: [warning on airline tickets]
  – Food safety laws: [restrict higher dose foods]
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  - Risk information laws
  - Food safety laws

- OK – most of us would agree that it would be disproportionate to control these exposures, but ........ they are controllable!

- Our system of protection has decided to allow them – they are ‘deemed acceptable’.
Common sense again

........ Why is it acceptable to automatically allow controllable exposures at levels of significant fractions of a mSv?

........ Whilst requiring some exposures to a very few persons to be reduced to µSv levels and lower?

• This places unnecessary burdens on society
• It is almost impossible to explain to peers
• It has the potential to call our profession into disrepute
Decisions at low dose
- the context of natural background

• **How to take decisions at ‘a few mSv/a and lower’**
  - when we don’t really know the risk, other than ‘if there is a risk, its very small’.

• **LNT in principle provides a prudent basis for the system of protection,**
  - but it needs a sense of proportionality in applying this prudence at these very low doses.
  - It must not be the only input to decision-making.

• **We need to develop a more pragmatic framework:**
  - which acknowledges the uncertainties,
  - recognises the wider framework of our radiation world,
  - and takes account of ‘common sense’
How to make decisions at very low dose

This is a challenging proposition

- it links to tolerability of risk and public perception

  • the classical ToR approach relies on comparisons to other generally accepted risks

  • but it does not take account of radiation risk uncertainty at low dose (it compares very real risks with hypothetical/inferred risk): prudence is OK, but it needs some balance

  • it also ignores the wider picture of our ‘radiation world’: the universal natural background gives a different dimension to radiation risk
We should make use of the context of natural background, and its variability, in our public interactions.

And we should beware reacting to ‘perceived public concern’ by imposing very low dose decisions:

– Does driving to low doses really ease public concern?
– Or does it make them think: ‘if it needs to be that low, this man-made radiation must be really dangerous’
– Hence it actually feeds ‘radiation phobia’

And remember that someone has to pay. Usually its all of us!

*The System of Protection itself, and how we implement it, should not try to anticipate any perceived public concern by reinforcing low dose expectations*
Conclusions and Recommendations

How to build a better, stronger and more relatable approach:

• Give greater emphasis to natural background exposure and its variability, both in general decision-making and in public interactions.

• Review the basis for assessing tolerability of risk, taking account of broader inputs such as the context of natural background.

• Further reinforce that optimisation is not minimisation.

• Continue to prioritise public engagement on radiation risk, but avoid an ‘auto-response’ of seeking ‘ever lower doses’.

• Ensure that decisions are based on realistic dose estimates rather than overly-conservative assessments.
And recognize the value of Common Sense