

Sep 30, 2021

Dear Sigurdur

On September 2, 2021, the International Correspondence Committee of the Japan Health Physics Society (JHPS) issued a request for comments on the ICRP paper to its members (deadline: September 22, 2021) (see <http://www.jhps.or.jp/cgi-bin/news/page.cgi?id=279>). As a result, two comments were submitted as follows. To further collect the feedback, the International Correspondence Committee has a plan to hold a symposium on the System of RP to address the ICRP paper at the annual meeting in December 2021. We are expecting that deeper discussions and various suggestions will be coming. We will continue to actively be involved for the development the future System of RP by feedbacking our members' view to IRPA.

1. (a. General comments)

The rationale for an annual effective dose limit of 1 mSv for public and the risks that could be expected in such a case should be offered clearly and repeatedly. The concept of why dose limits are only used for planned exposure situations and reference levels are greater than the annual effective dose of 1 mSv should also be offered clearly and repeatedly. After the Fukushima Daiichi Nuclear Power Plant accident, these limits were directly considered by for not only business operators and radiation workers but also the public. They may be dismissed at the door of the debate as "opportunistic and arbitrary" for the reason that limitations are laxer for emergency and existing exposure situations. It is believed that this misunderstanding needs to be cleared up.

2.(b. Specific comments (on ICRP paper 4.2))

The policy of making the calculation of effective doses more detailed and simplifying them (e.g. dose limits) later is understandable in some respects. But, even if detailed calculation procedures are set up, is there sufficient scientific knowledge available to ensure that the calculation results are accurate? I am concerned that if assumptions are used in the process of detailed calculations where there is a high degree of uncertainty, this may lead to an imbalance in the overall calculation between the detailed part and the part relying on assumptions.

Best regards

International Correspondence Committee of JHPS