

International Conference on Radiation Safety: Improving Radiation Protection in Practice

IAEA Headquarters Vienna, Austria; 9–13 November 2020

Organized by the International Atomic Energy Agency (IAEA); in cooperation with: the European Commission (EC); the Food and Agriculture Organization of the United Nations (FAO); the International Labour Organization (ILO); the OECD Nuclear Energy Agency (OECD-NEA); the Pan American Health Organization (PAHO); the United Nations Environment Programme (UNEP); and, the World Health Organization (WHO)

Emerging Challenges in Radiation Protection

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Member of the Commission of Safety Standards of the IAEA

Member of the Committee of Radiation Protection and Public Health of NEA (OECD)

The international radiation safety system is one of the more significant international and intergovernmental successes!

The international radiation safety system

- **Universal and consensual**
- **Founded on internationally accepted science**
- **Based on an universal paradigm recommended by a non-governmental charity.**
- **Resulted in an intergovernmental regime of standards and norms co-sponsored by all relevant international agencies.**
- **Includes provisions for practical applications from international professional societies.**

**CONSENSUAL
SCIENCE**



**UNIVERSAL
PARADIGM**



**INTERGOVERNMENTAL
STANDARDS & NORMS**



**PROVISIONS FOR
APPLICATION**



Notwithstanding this success

....after nearly a century on the run,.....

.....the system may need some **review**... 

...and... eventually.....

revision and fixing!...



Purposes of this presentation

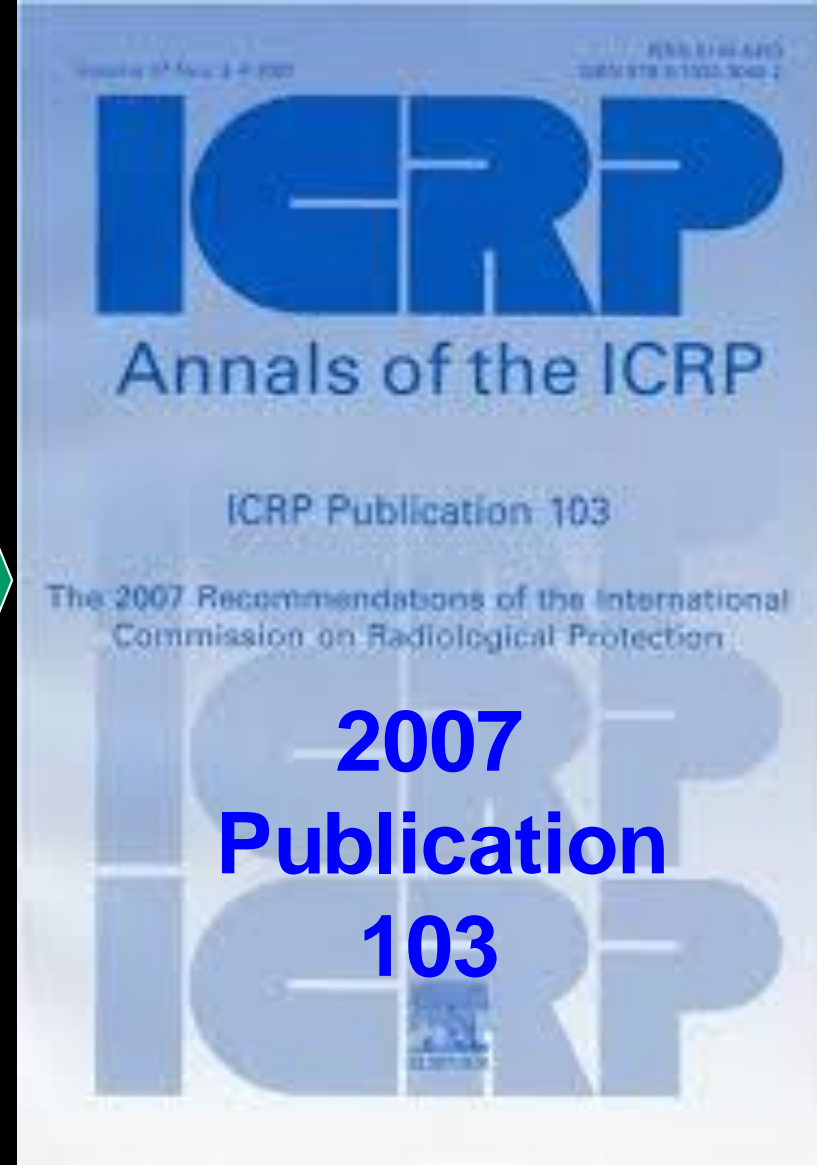
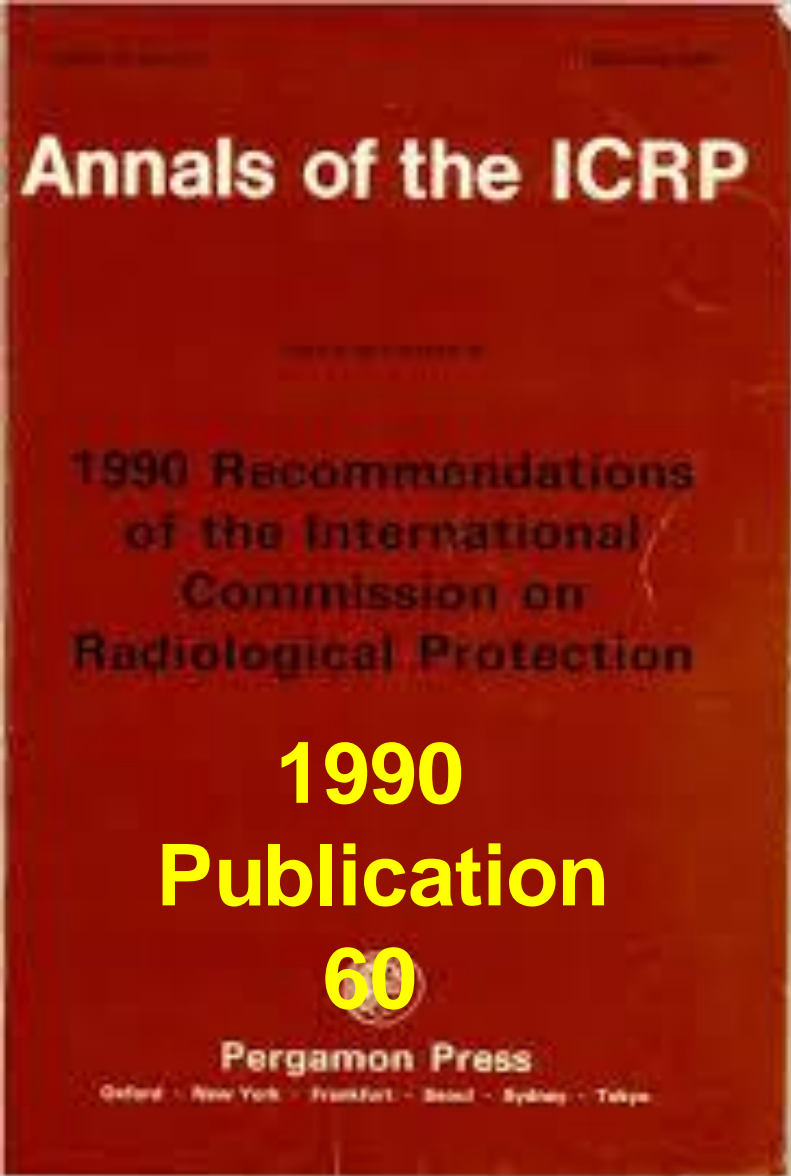
1. Submitting a personal **diagnosis of problems**, and
2. Describing **challenges for fixing** them....but...
...in order to prevent **misunderstanding**, I will present it as a



..because, I was involved in developing the system!

Sorry. Sorry. Sorry. Sorry. Sorry.
Sorry. Sorry. Sorry. Sorry. Sorry.
Sorry. Sorry. Sorry. Sorry. Sorry.
Sorry. Sorry. Sorry. Sorry. Sorry.
Sorry. Sorry. Sorry. Sorry. Sorry.
Sorry. Sorry. Sorry. Sorry. Sorry.
Sorry. Sorry. Sorry. Sorry. Sorry.







Water under the bridge
Lessons learned?

Content

(Emerging Challenges)

- 1. Scientific basis**
- 2. Ethics & Principles**
- 3. Situations & Categorization**
- 4. Standards & Applications**
- 5. Epilogue**

1.

Scientific basis
(The LNT conundrum)

Mea culpa

We did not clearly differentiate between:

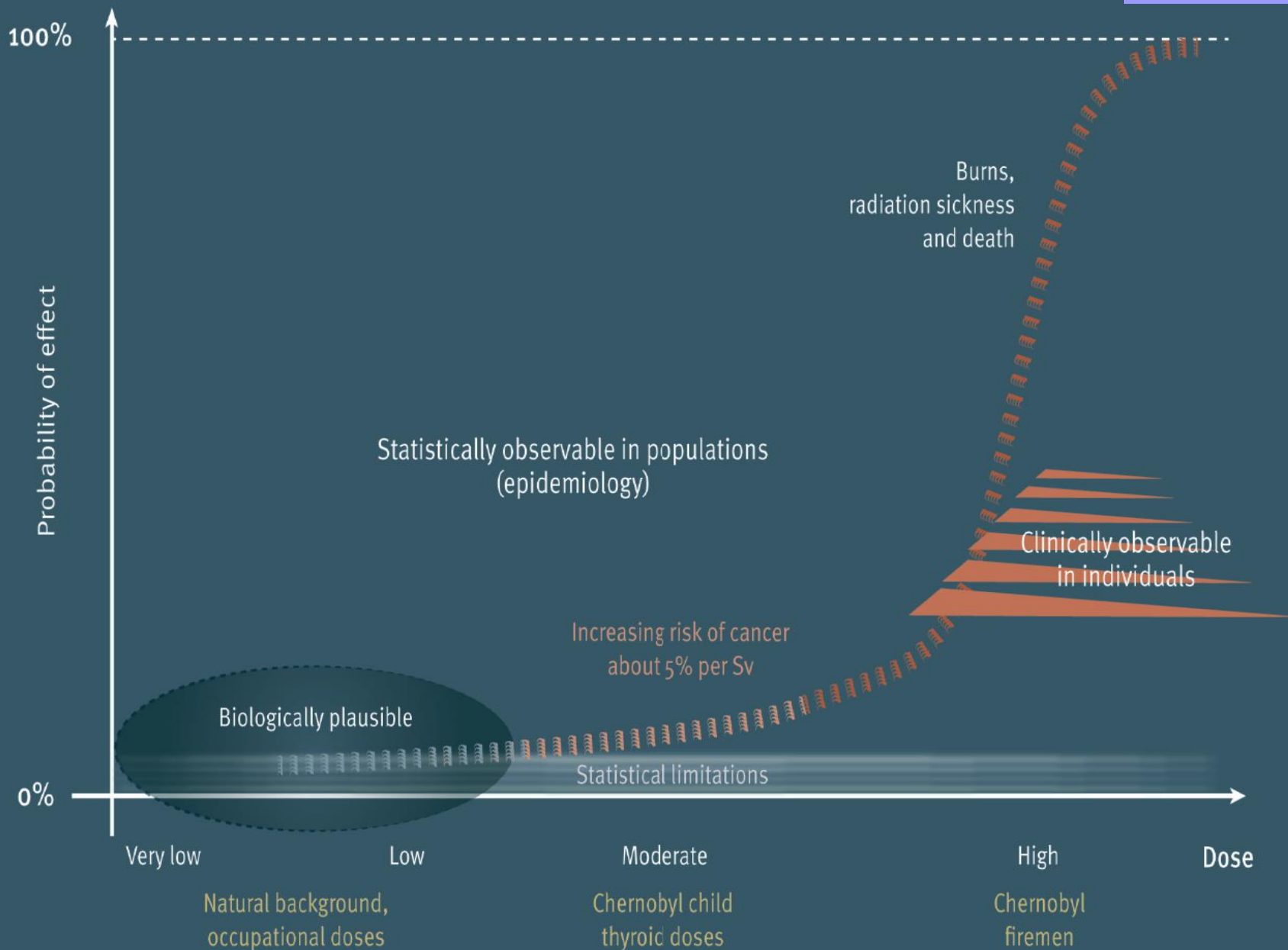
□ Proved **THESIS** on radiation **EFFECTS**
(and their **retrospective attribution**)

and

□ Conjectural **HIPOTHESIS** on radiation **RISKS**
(and their **prospective inference**)

**Thus, A LNT protection model was
confusedly explained and contradictorily
presented as a LNT scientific fact!**

Relationship of radiation doses and health effects



Postulated
likelihood of health effects

Nominal risk=5%/Sv

Total
background
incidence of
effects

Nominal incremental
likelihood
of health effects

Incremental dose

Dose

Background
annual dose
(average 2.4,
typical 10 mSv y⁻¹)

LNT

The critical question

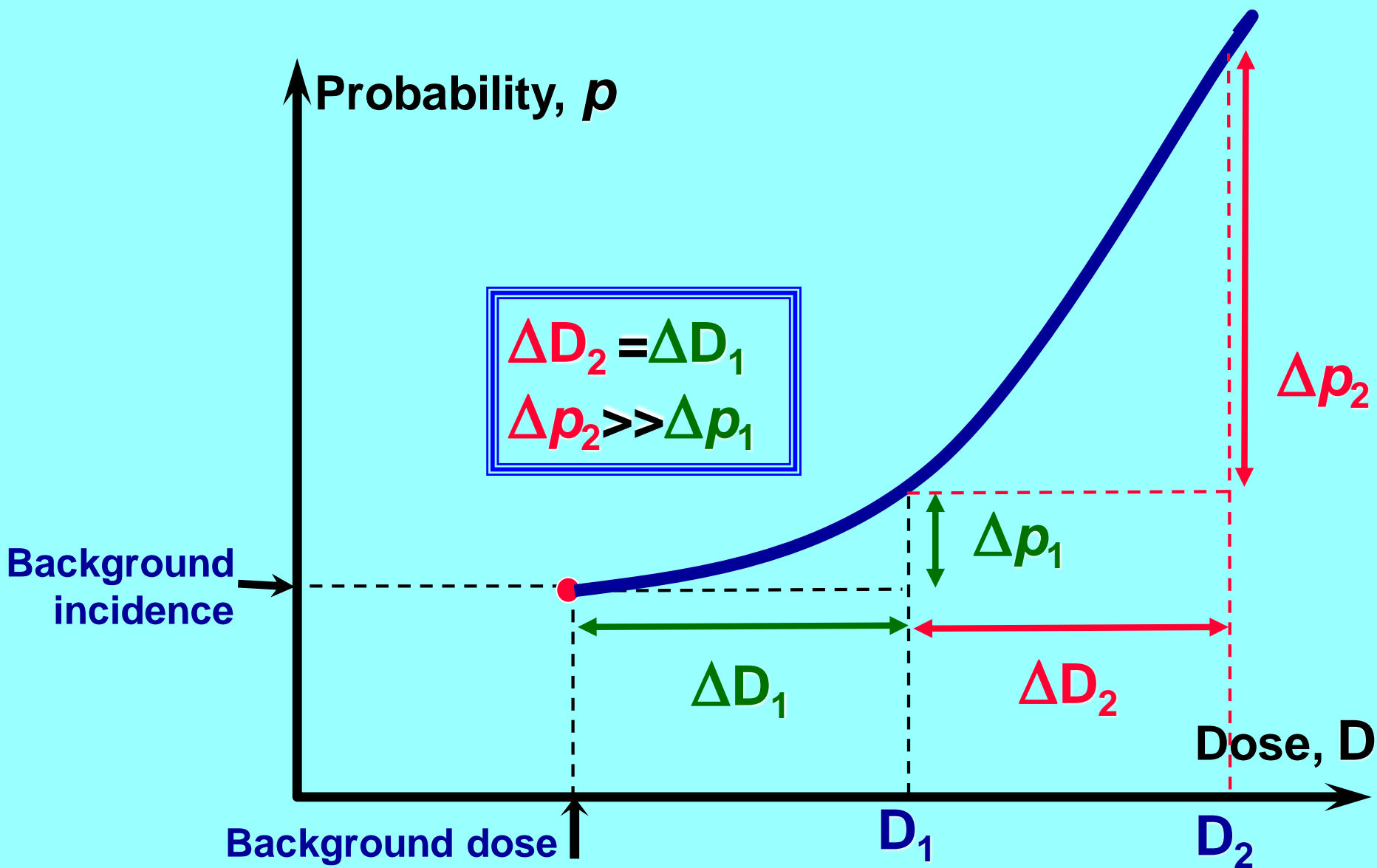
Is the recommended **LNT** :

- a proved **thesis**?

or

- an operational practical **model**?

- The intention was to recommend LNT as a **model** used for radiation protection purposes
- For ICRP, LNT ‘**provides the basis for the summation of doses from external sources of radiation and from intakes of radionuclides**’



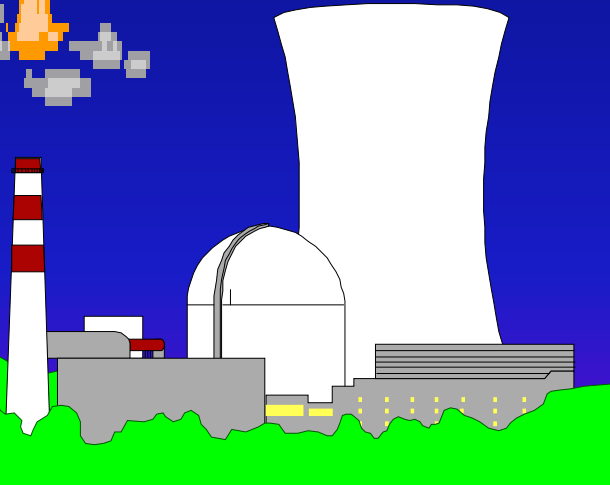
Challenge

**If the LNT conundrum
is not clarified,**

**another more difficult conundrum will
continue to emerge:**

**counting corpses following low-dose
radiation exposure situations**

Modeling



Discharges

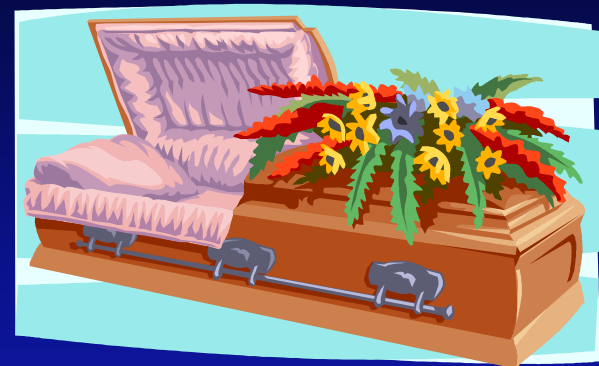


Collective doses

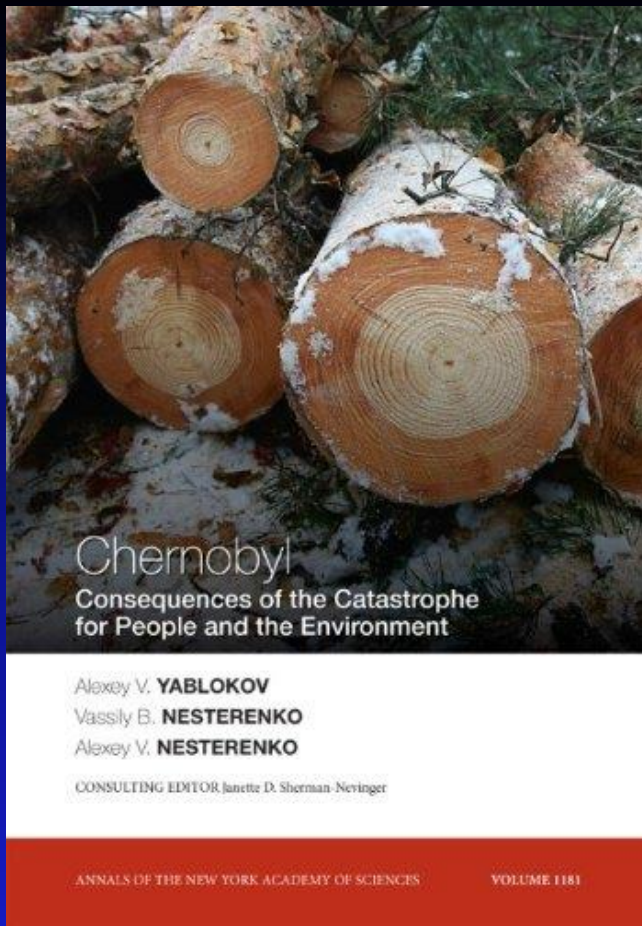


$\times 5\%/Sv$

$=$



Collective Dose x Nominal Risk Coefficient = Nominal Deaths



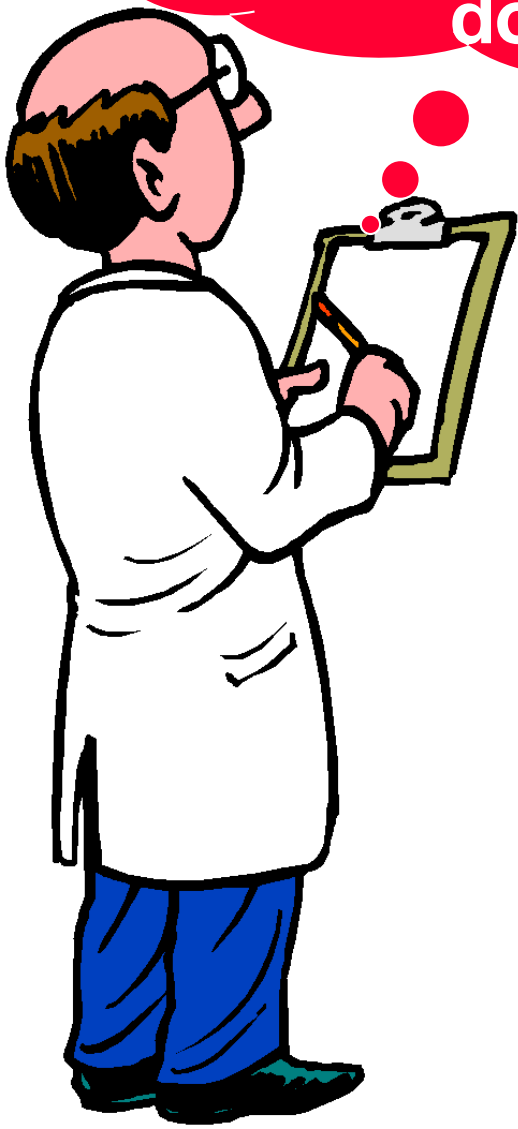
Chernobyl

Consequences of the Catastrophe for People and the Environment

Annals of the New York Academy of Sciences

*It concludes that,
some 985,000 people died due to the
Chernobyl accident!*

**This calculation
should not be
done!**



**Why
not?**





UN General Assembly: 193 States

Clarified the issue in 2012!

SOURCES, EFFECTS AND RISKS OF IONIZING RADIATION
UNSCEAR 2012 Report

Report to the General Assembly

ANNEX A

SCIENTIFIC ANNEXES A AND B

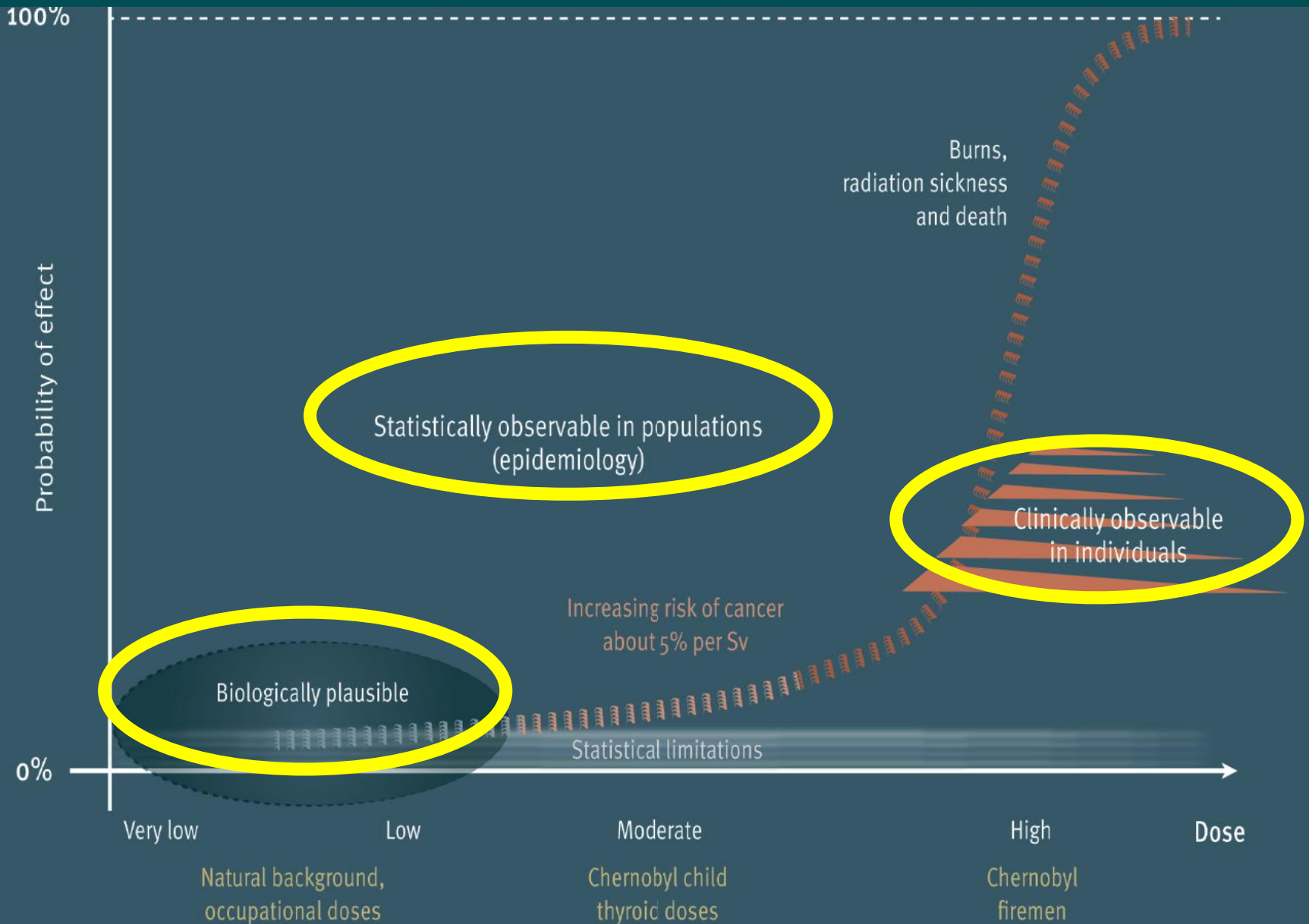
**ATTRIBUTING HEALTH EFFECTS TO IONIZING
RADIATION EXPOSURE AND INFERRING RISKS**



UNITED NATIONS

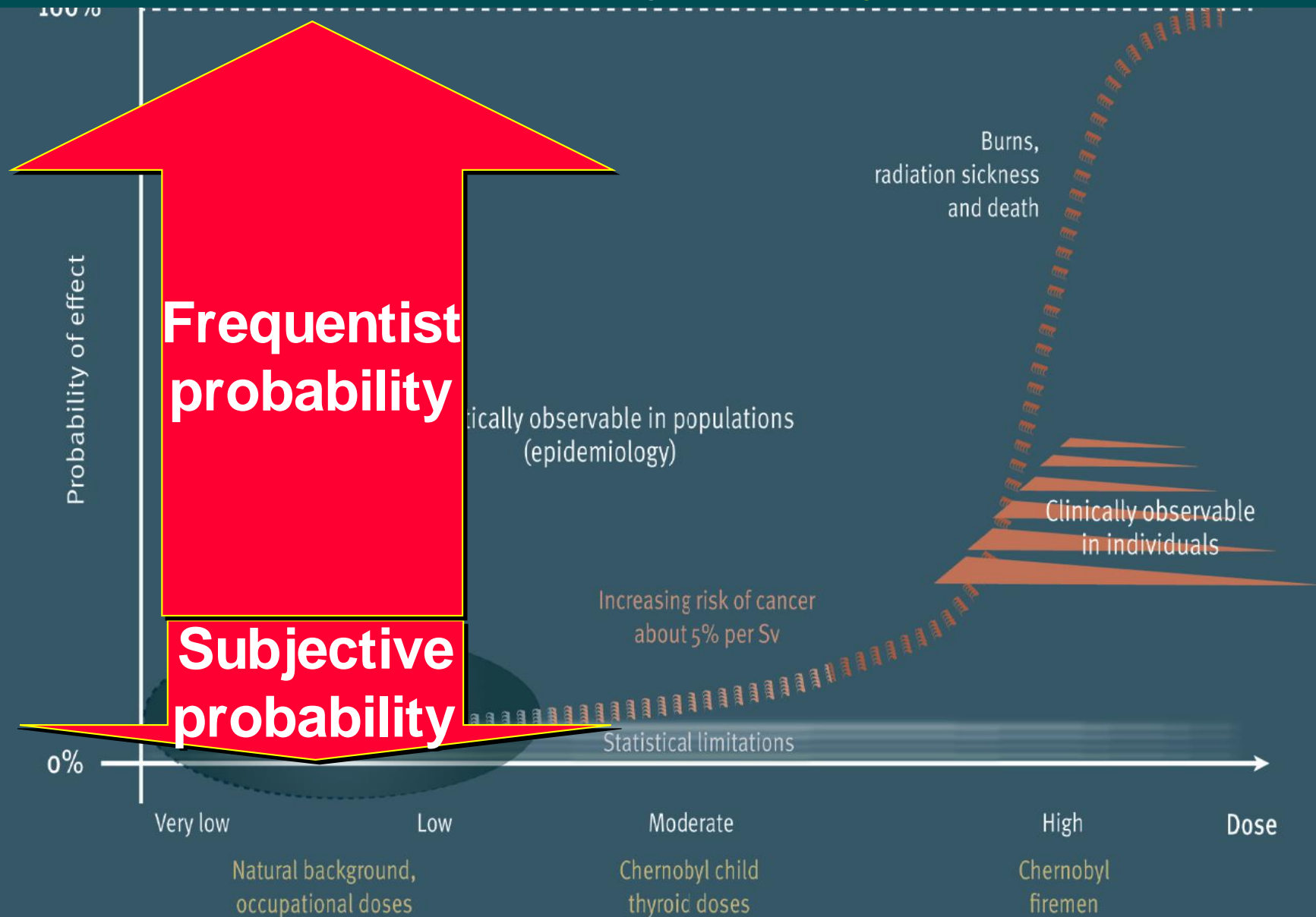
Identifying factual thesis
vs.
Conjectural hypothesis

A clear distinction between effects: clinically observable, statistically observable and biologically plausible



**How the effects are quantified:
frequentist vs. subjective probabilities**

At high doses there are **measurable frequencies** of effects but at low doses just **subjective probabilities**

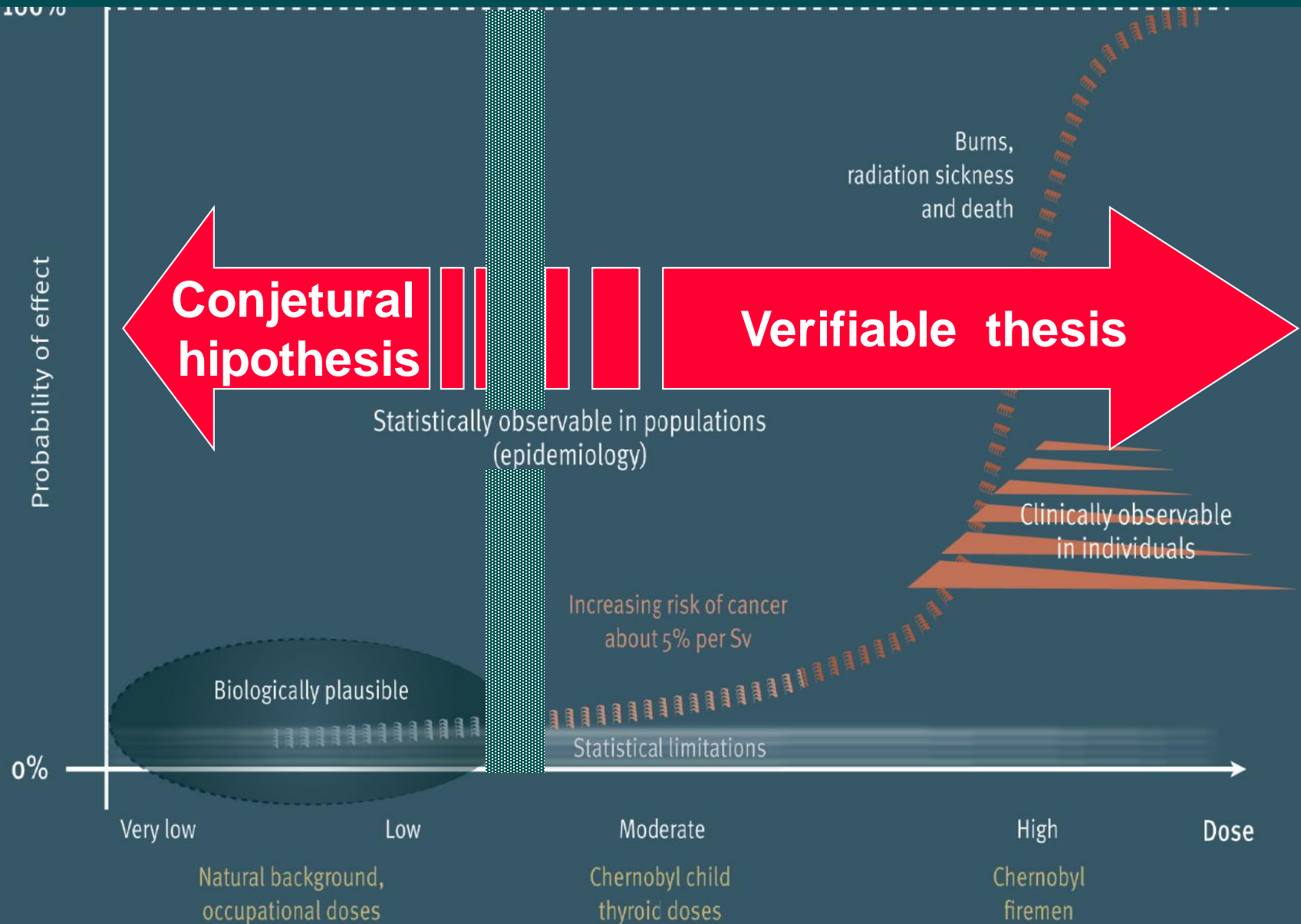


Verifiable thesis

vis-à-vis

Conjectural hypothesis

At high doses the effects are verifiable facts, but at low doses they are subjective conjectures

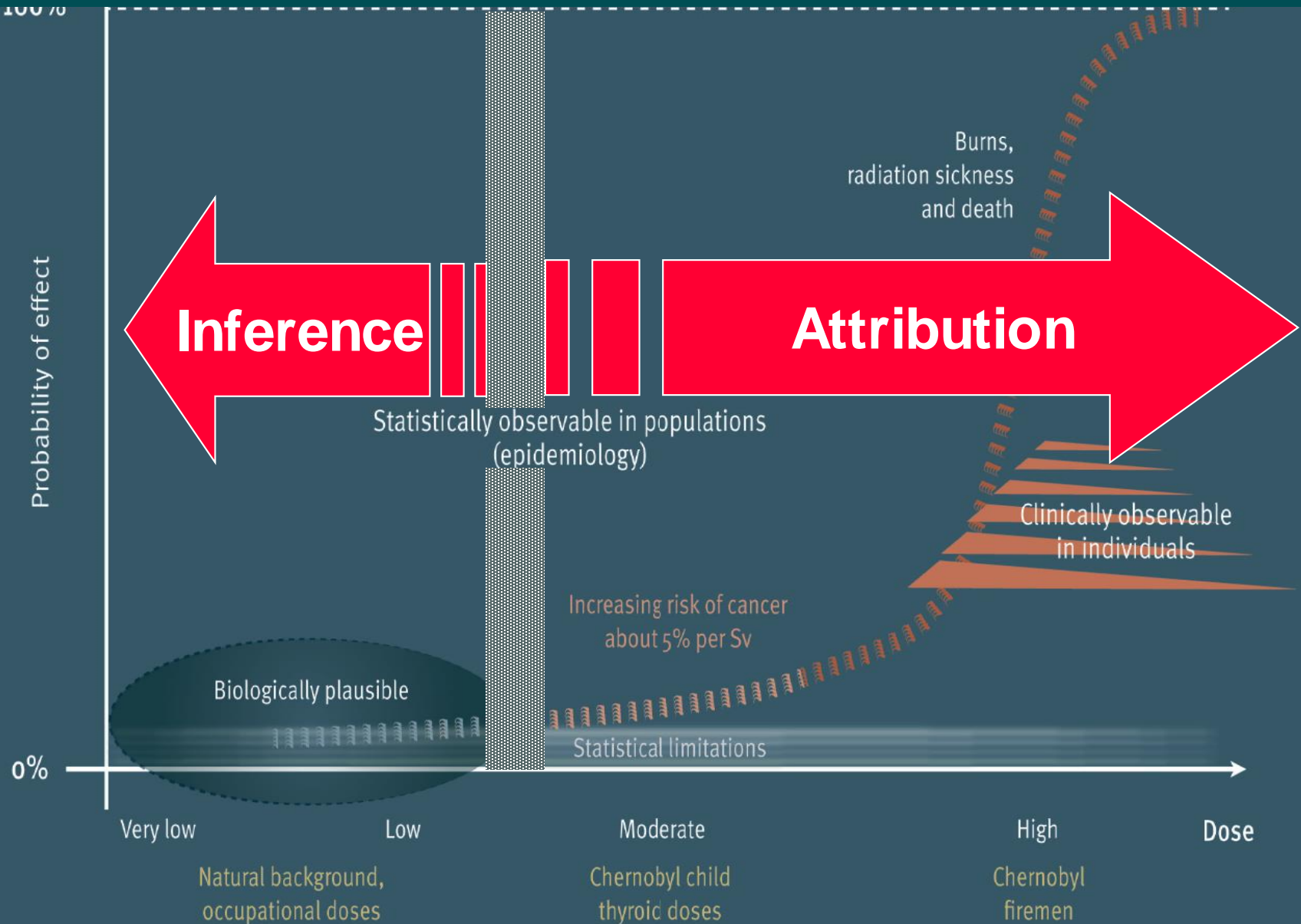


Attribution

vis-à-vis

inference

At high doses, **effects** are **attributable**; at low doses there might just be a **inference** of radiation **risk**



Thesis of deterministic effects



Individual radio-pathological diagnosis

Thesis of stochastic effects



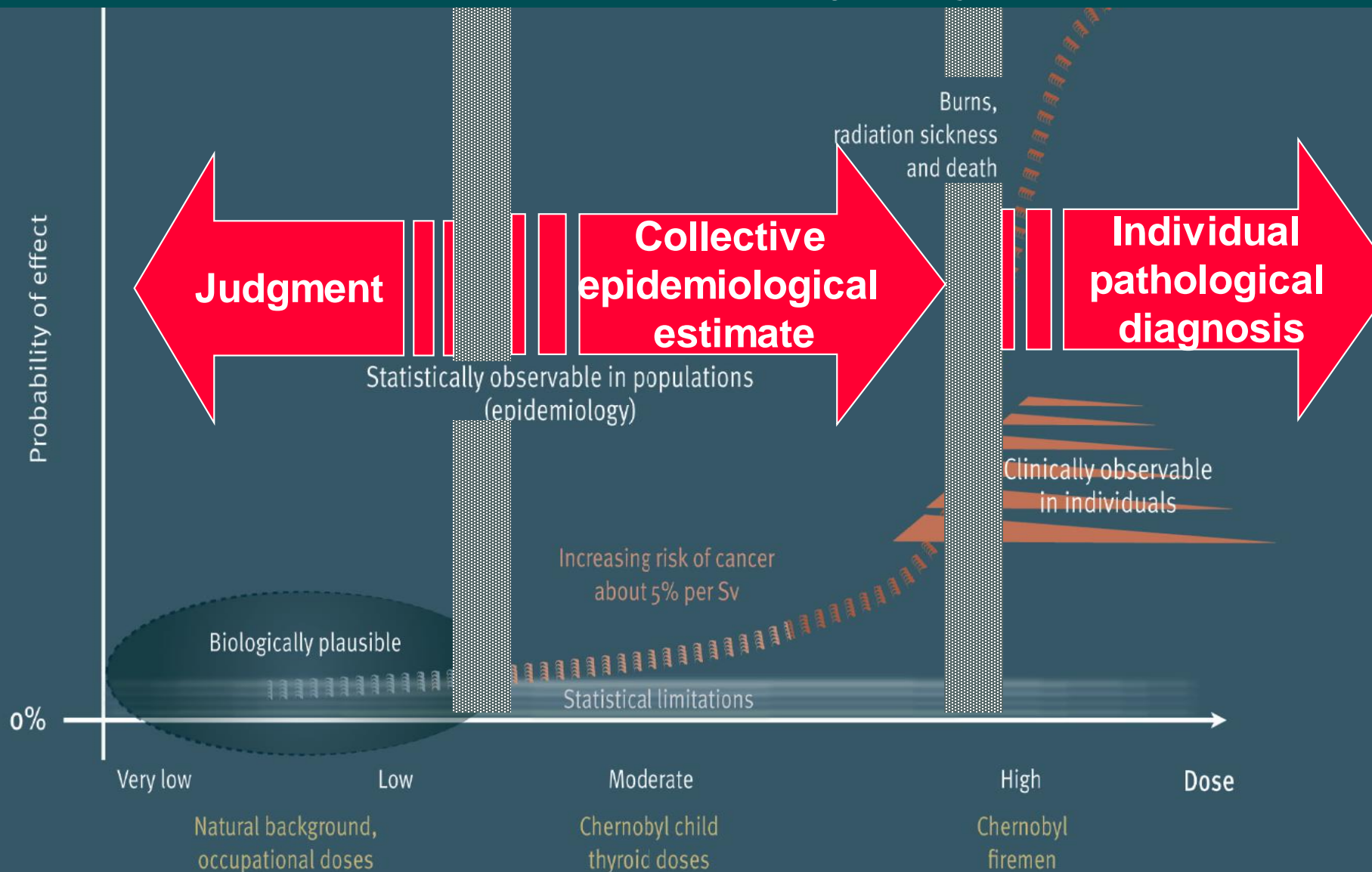
Collective radio-epidemiological estimates

Hypothesis of risk



Radio-protection scientific judgment

At very high doses the effects are diagnosable in the exposed individual, at moderate doses they can be collectible estimated, at low doses they are just extrapolable



Individual attribution

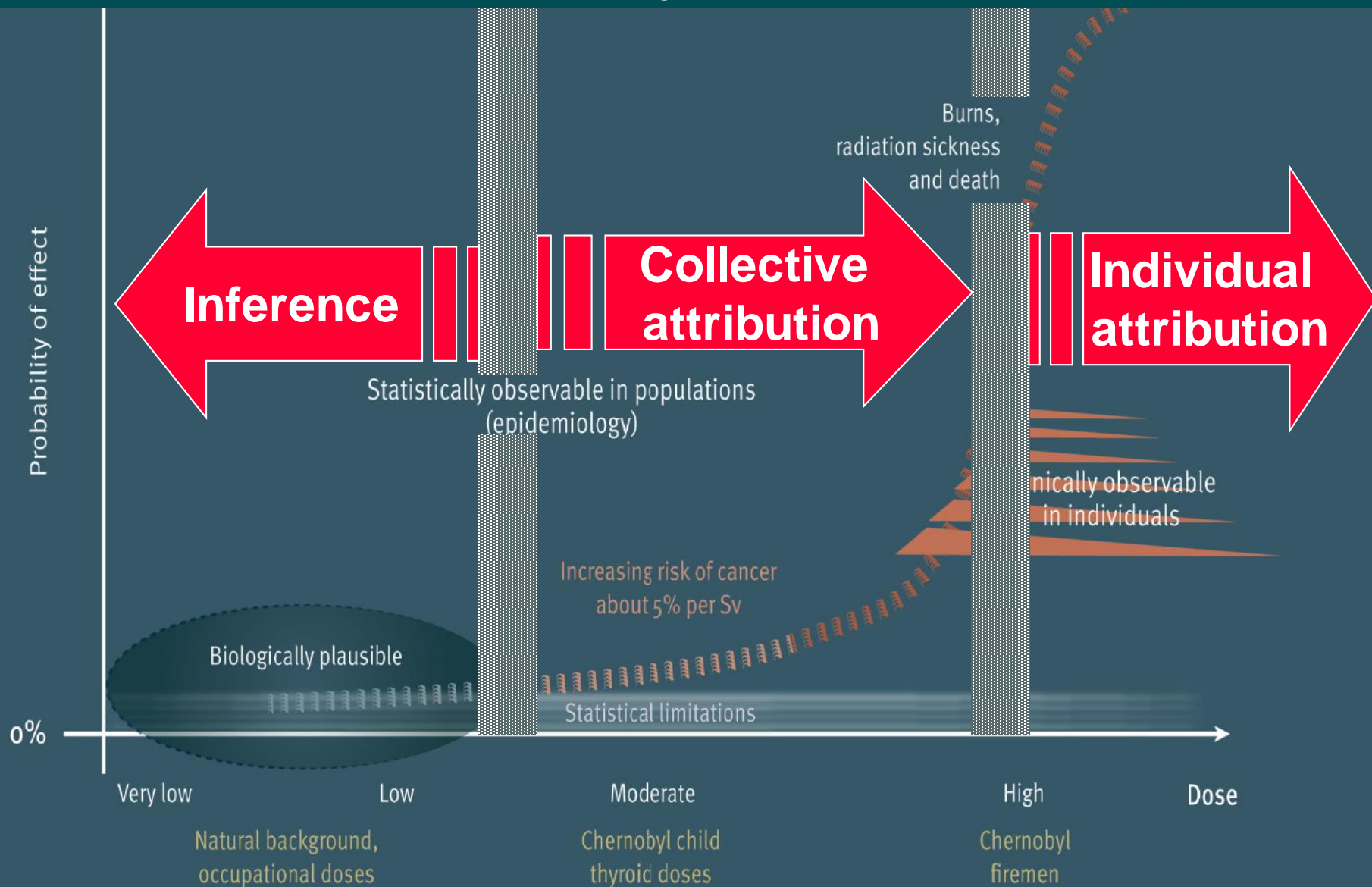
vis-à-vis

collective attribution

vis-à-vis

conjectural inference

High doses → Individual attribution
Moderate doses → collectible attribution
Low doses → just inference



Attesting

(providing formal evidence of)

- **Radio-Pathologists**

(Individual diagnosis of deterministic effect)

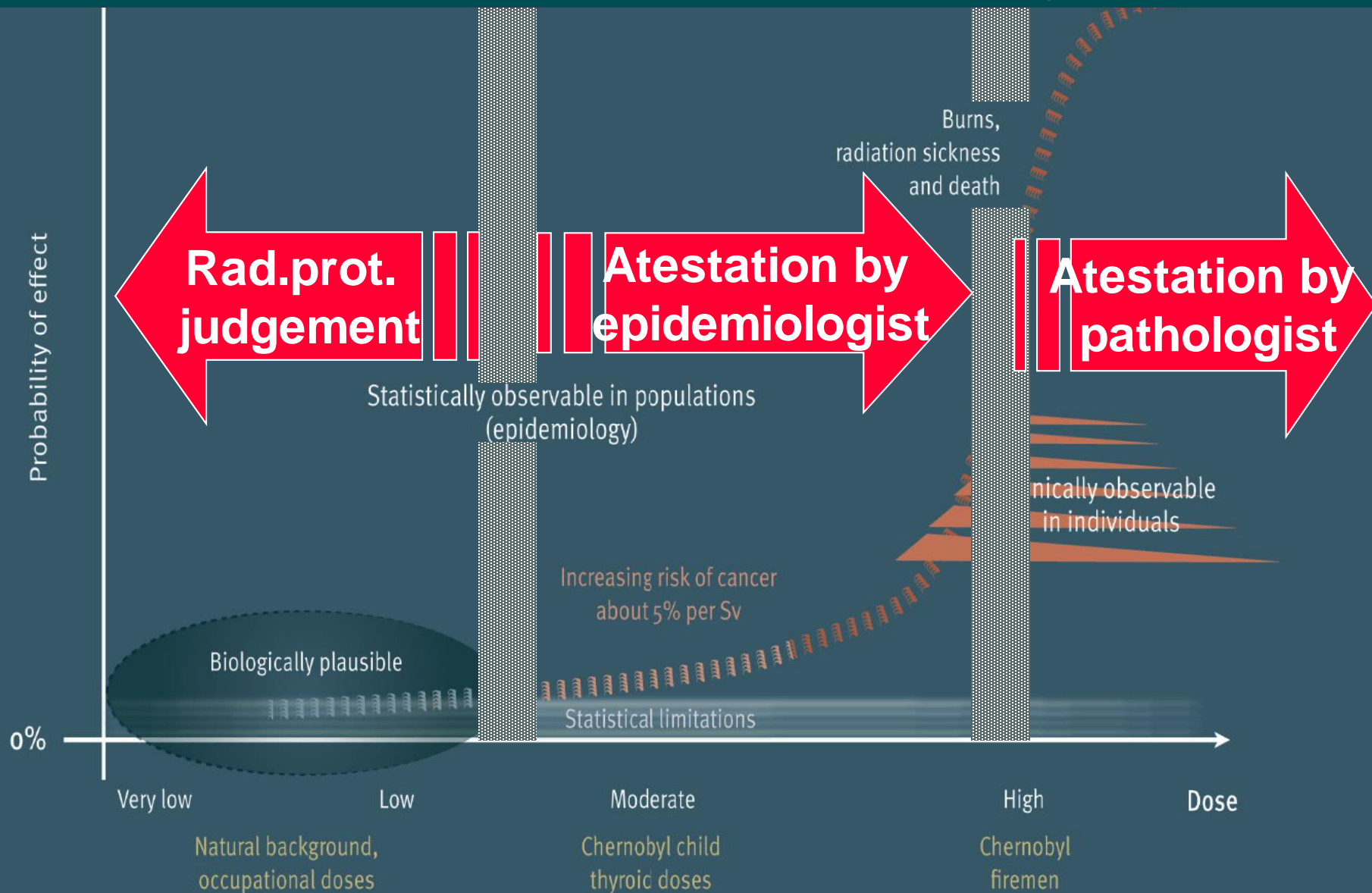
- **Radio-Epidemiologists**

(Collective estimate of stochastic effects)

- **Radio-protectionists**

(Judgement of hypothetical risk)

Individual effects → high doses → radio-pathologists
Collective effects → Moderate doses → radio-epidemiologists
Risks → low doses → radio-protect. judgment



Emerging challenges for the future

Distinguishing

*probabilities based on frequencies of factual
occurrences*

from

*probabilities based on subjective judgments
about potential occurrences.*

Distinguishing

the attribution of provable radiation effect

from

the inference of probable radiation risks.

Distinguishing

attribution of radiation effects incurred by

individuals

from

attribution of changes in the incidence of

radiation effects on large

populations

Clarifying

attestation of individual effects by

radio-pathologists

from

attestation of collective changes in the

incidence of effects by

radio-epidemiologists.

Distinguishing
scientific attribution
from
legal imputation

Radio-pathologists



Attribute individually

Radio-epidemiologists



Attribute collectibly

Radio-protectionists



Infer risks

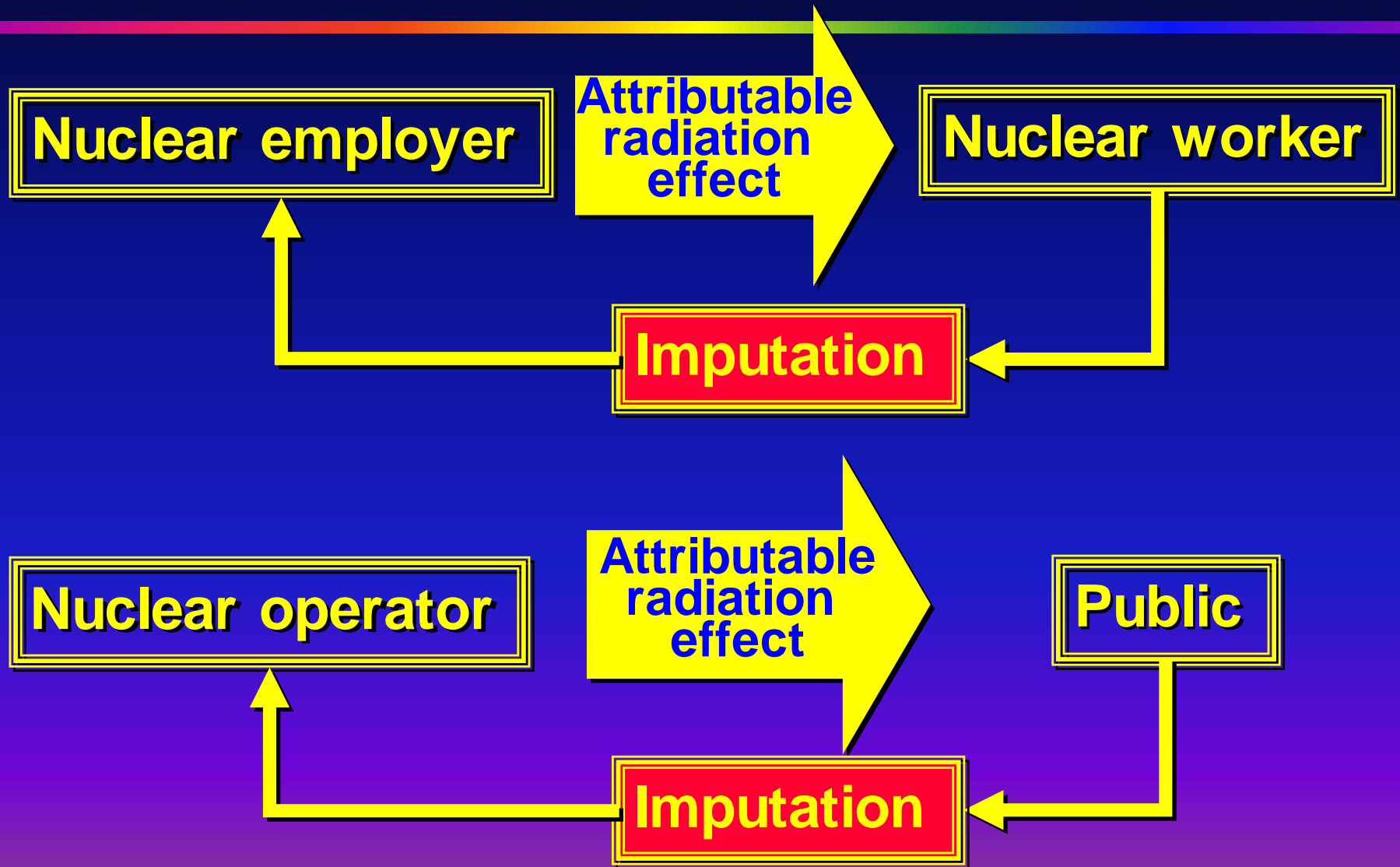
Lawyers



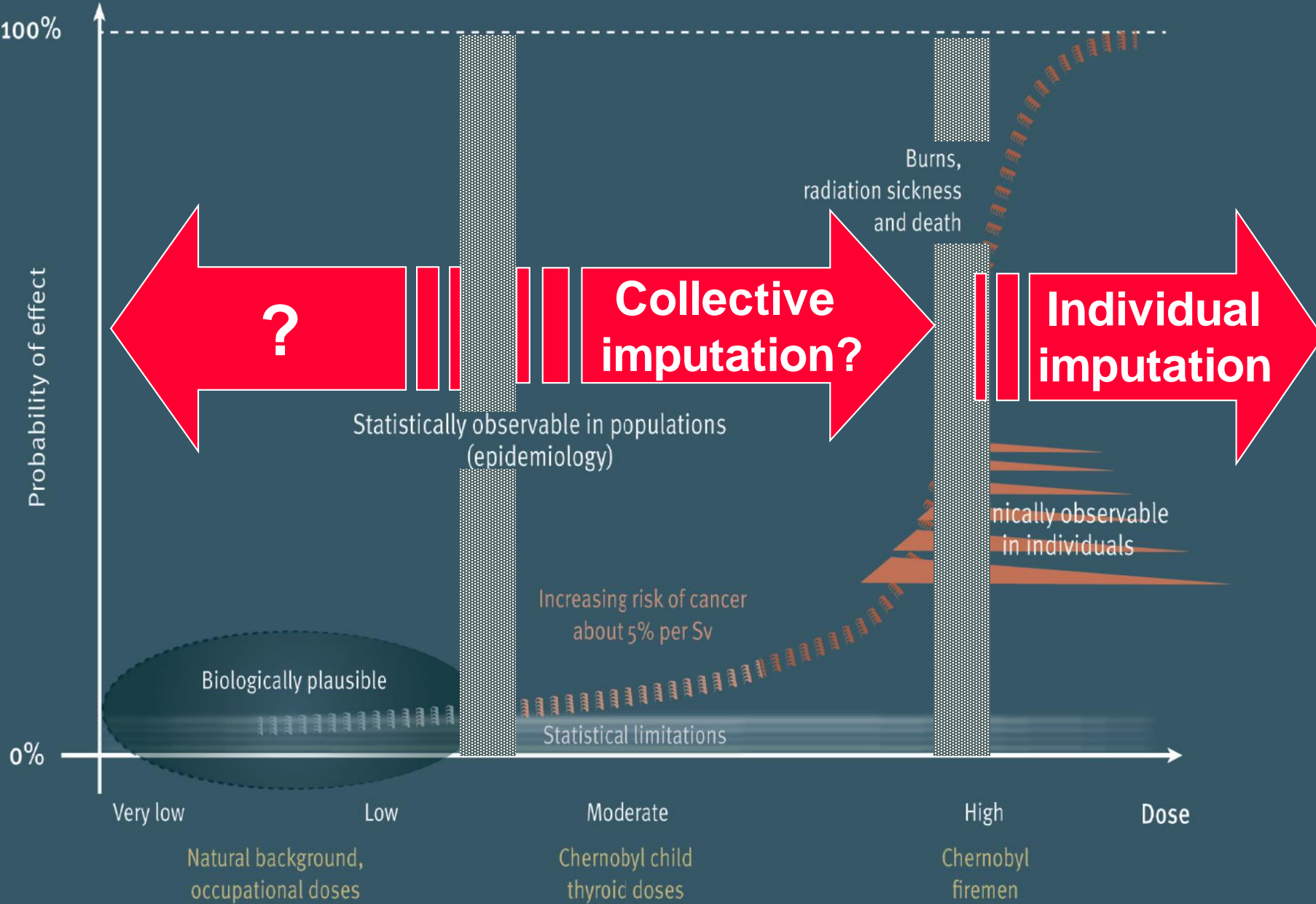
Impute

- either imputing on behalf of a client or,
- defending a client from an imputation

Imputation



Relationship of radiation doses and health effects



2.

**Ethical foundations
and fundamental principles**

Mea Culpa

- Any system affecting human life shall be based on solid ethical foundations, and the RP system complies with this rule

...but....

- Our explanation has not been clear enough

We have to improve it in view of UNSCEAR's output

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ICRP

Annals of the ICRP

ICRP Publication 138

Ethical Foundations of the System of Radiological
Protection

**Ethical
Foundations?
Or core values?**



Values ≠ Ethics

Values

- basic beliefs that motivate attitudes and motives behind purposeful action

Ethics

- philosophy defining good and evil, right and wrong, virtue and vice, justice and crime, by systematization and logic.

Core values in ICRP 138

□ **Beneficence and non-maleficence**

prevents harmful effects for humans and the environment

□ **Prudence**

allows uncertainties to be taken into account

□ **Justice**

ensure social equity and fairness in decisions

□ **Dignity**

consider the respect that one must have for people

ANNEX A. ETHICAL THEORIES

□ **Virtue ethics**

□ **Consequentialist ethics**

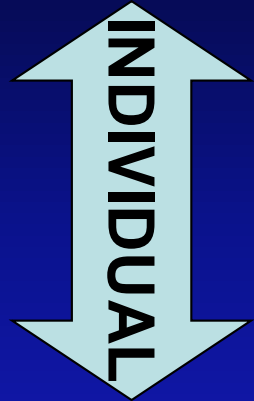
□ **Deontological ethics**

Basic ethics doctrines (in ICRP tradition)

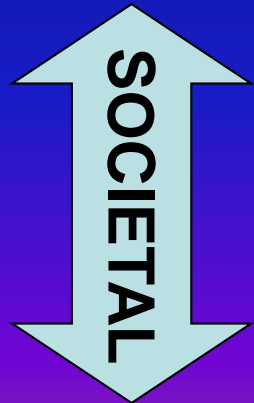
- **Individual** oriented ethics
- **Societal** oriented ethics

Fundamental Ethical Doctrines in ICRP

- Deontological Ethics (based on *duty*)
- (ἀρετή) Areté Ethics (based on *virtue*)



-
- Teleological Ethics (*consequence*)
 - Utilitarian Ethics (*utility*)



**Teleological
(consequence)**

**Utilitarian
(utility)**

**Doctrines
on
Ethics**

**Deontological
(duty)**

**Areté
(virtue)**

Teleological
(consequence)
*Mind the ends, which
justify the means*

Utilitarian
(utility)
*Do the greatest good
for the greatest
number of people*

**Ethical
Aphorisms**

Deontological
(duty)
*Not do unto
others what they
should not do
unto you*

Areté
(virtue)
*do
good that will
not be returned*

Intergovernmental Fundamental Safety Principles

IAEA Safety Standards

for protecting people and the environment

Jointly sponsored by

Euratom

FAO

IAEA

ILO

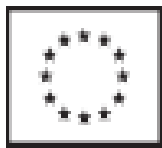
IMO

OECD/NEA

PAHO

UNEP

WHO



IAEA



WHO



IAEA

International Atomic Energy Agency

Intergovernmental Fundamental Safety Principles

- 1: Responsibility for safety
- 2: Role of government
- 3: Leadership and management for safety
- **4: Justification of actions**
- **5: Optimization of protection**
- **6: Limitation of risks to individuals**
- **7: Protection of present and future generations**
- 8: Prevention of accidents
- 9: Emergency preparedness and response
- 10: Protective actions to reduce existing or unregulated radiation risks

Teleology
(consequence)
↓
Justification

Utilitarian
(utility)
↓
Optimization

**Ethics
of
Protection**

Deontology
(duty)
↓
**Individual
Restrictions**

Areté
(virtue)
↓
**Commitment
to the future &
environment**

Teleologism (consequences)

- The morality of protective actions should be judged against its overall consequences.

Justification

- Any decision that alters the radiation exposure situation should do more good than harm

Utilitarianism

(utility)

- The morality of protective actions should be judged against its contribution to the overall utility, namely to the best welfare among all people.

Optimization

- The selected radiation protection option should be the best under the prevailing circumstances, maximizing the margin of benefit over harm.

Deontology (duty)

Individual Protection

- The morality of protective actions should be judged by the duty to protect individual human beings, rather than by their overall consequences or utility.

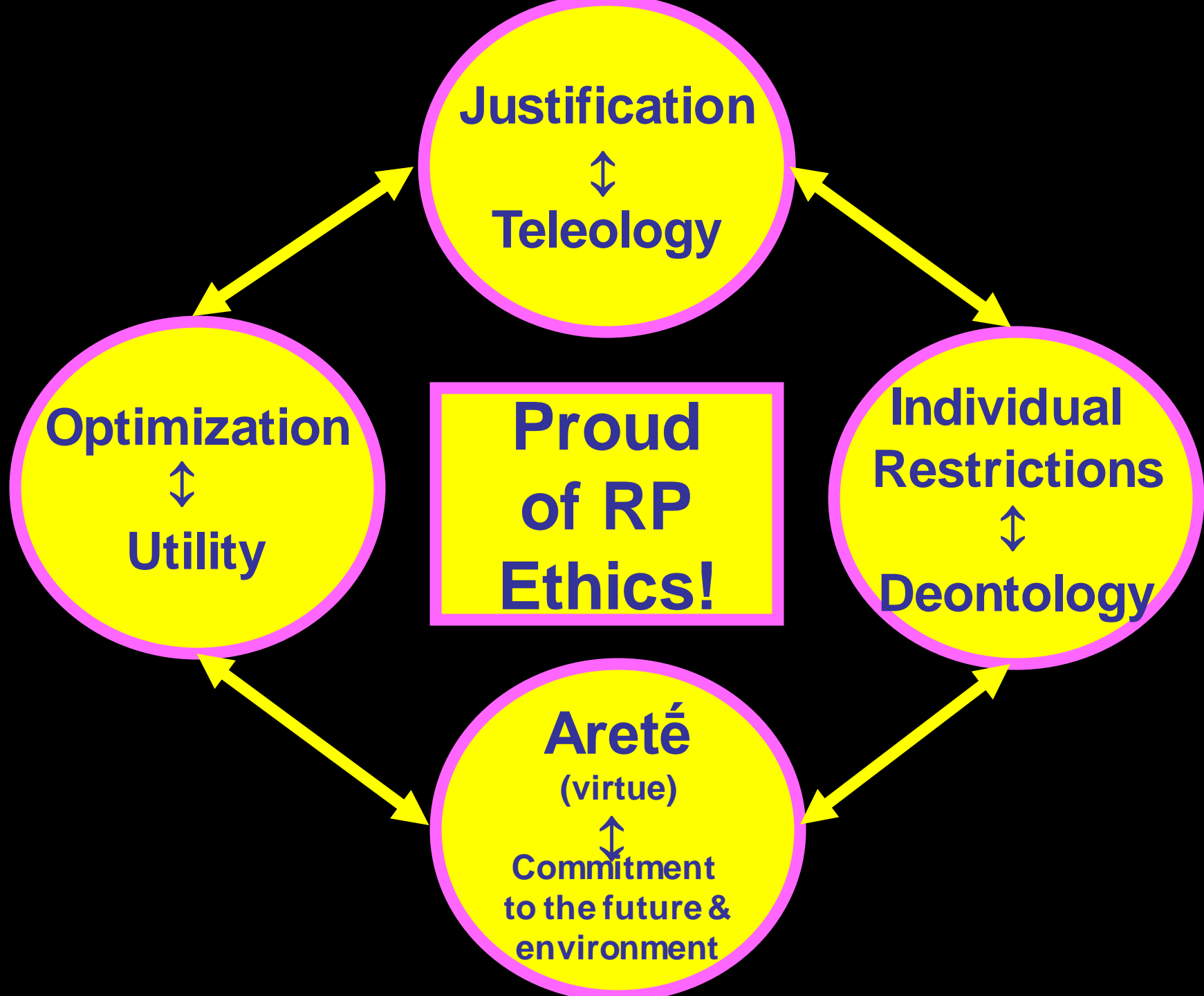
- Inequitable protection options should be prevented by restricting individual risks.

Areté (virtue)

Future

- The morality of protective actions should be judged by their virtuosity rather than their consequences, utility or duty.

- Protection should be provided to both, present and future generations and their environment, against scientifically plausible radiation harm even if it is uncertain.



Challenge

- **Reformulate the fundamental principles**
- **Associate them to the ethical basis**

The fundamental principles

- Principle of Justification of changes in exposure
- Principle of Optimization of protection options
- Principle of individual risk restrictions
- Principle for the future and the environment

‘Limits’ that are not limits

The 'Dose Limits' are not:

- **a point beyond which doses may not pass,**
- **or a terminal point or boundary for doses**
- **or the furthest extent of dose endurance.**
- **or a restriction on the size or amount of the radiation dose people were permitted.**

Namely, THEY ARE NOT LIMITS!

3.
Exposure situations
&
Categorization of exposures

Mea culpa

1. The description of “**radiation exposure situations**” were probably informative but perhaps confusing and thus unhelpful in practice
2. In addition three “**categories of exposure**” were identified, but they are unclear and incomplete.

Exposure situations

- Existing (or extant?)
- Planned
- Emergencies

Challenge

- Was categorization in exposure situations helpful?
- For people expecting to be protected....
....Will they be interested on where the radiation dose they are incurred is arising from an planned, emergency or existing situation?
- Perhaps it was more logical and understandable the old approach of simply:
 - **Restricting increases of doses**
 - **Requiring decreases of doses**

Regulatory restrictions

**Expected
additional
dose**

Background

Activity introduced



DANGER

**CONTAMINATED
AREA**



Extant

dose

**Doses
that
can be
averted**

**Regulatory
ambition**

Current categories of exposure

Precisely defined:

- Occupational
- Public

Less precisely defined:

- Medical

In semi-limbo:

- Rescuers
- Volunteers
- Comforters

Medical exposure

Exposure incurred by:

- **patients** undergoing:
 - **diagnosis** (medical or dental)
 - **treatment**;
- **comforters**
(persons voluntarily helping in the support of patients)
- **volunteers**
(in a programme of biomedical research involving their exposure)

Challenge

Revising the categorization of exposures

Possible re-categorization

- Patients undergoing radio-diagnosis
- Patients undergoing radiotherapy
- Comforters
- Volunteers in medical research
- Workers under ILO 105
- Rescuers workers
- Volunteered workers
- Members of the public

4.

**Establishing standards
and setting up norms**

Mea Culpa

We have consolidated a confusing mix of:

- ❑ **Conventions**
- ❑ **Declarations**
- ❑ **Standards**
- ❑ **Norms**

Conventions≠Declarations≠Standards≠Norms

- Conventions describe binding commitments**
- Declarations express non-binding policies**
- Standards establish level of attainment.**
- Norms detail binding requirements.**

Standard

(from Latin *estendere* 'extend', influenced by stand)

An agreed level of attainment or achievement

Norm

(from Latin *norma*, precept, rule)

A prescription that is required or ruled

Example of standard

IAEA Safety Standards for protecting people and the environment

Fundamental Safety Principles

Jointly sponsored by



Safety Fundamentals
No. SF-1



Quasi example of Norm

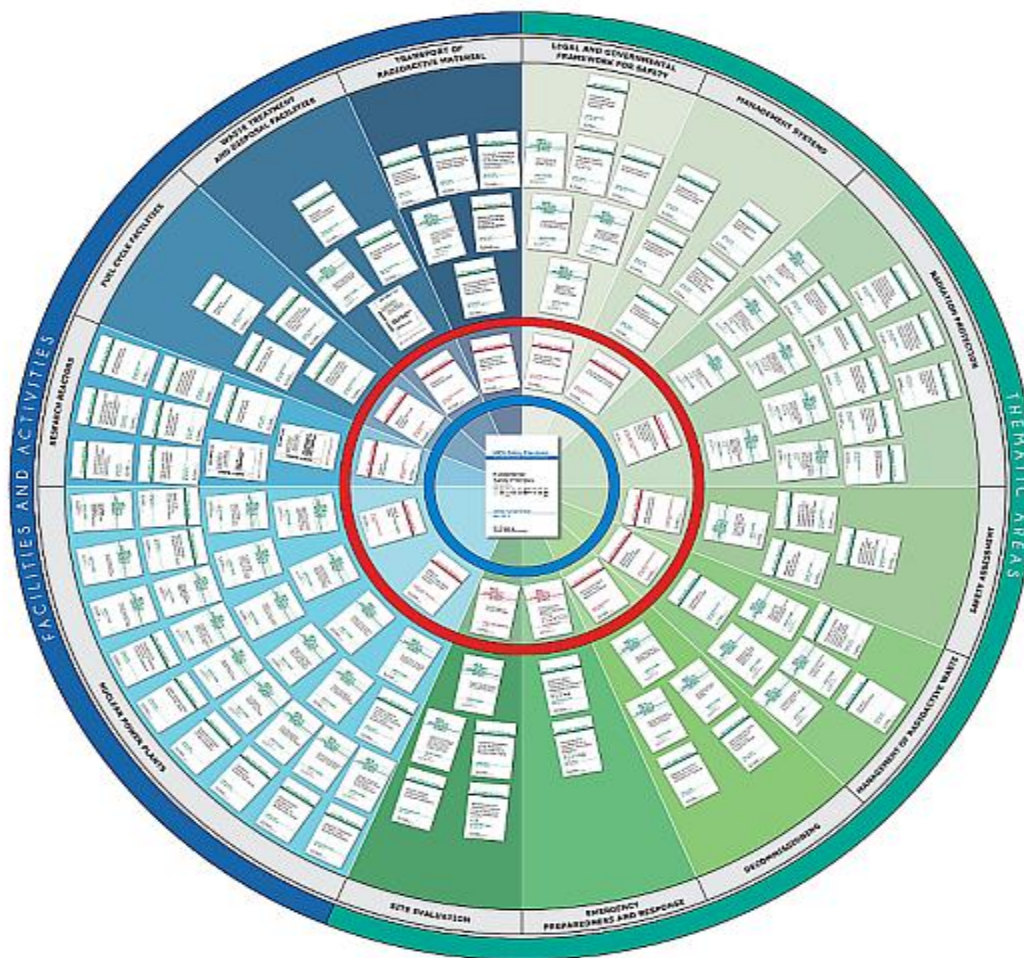
IAEA Safety Standards
for protecting people and the environment

Regulations for the
Safe Transport of
Radioactive Material
2018 Edition

Specific Safety Requirements
No. SSR-6 (Rev. 1)

IAEA Safety Standards

protecting people and the environment



Status as of June 2012



IAEA
International Atomic Energy Agency
Atoms for Peace



The International Atomic Energy Agency (IAEA) is a United Nations system organization with its headquarters in Vienna, Austria. The IAEA's mission is guided by the interests and needs of Member States and focuses on advancing and supporting the peaceful uses of nuclear science and technology, promoting high levels of nuclear safety and security, and verifying compliance with non-proliferation agreements.

Further information on the activities undertaken by the IAEA can be found at: www.iaea.org

To promote high levels of nuclear safety, the IAEA publishes Safety Standards for use in the nuclear industry. The hierarchy of the Safety Standards begins with the Fundamental Safety Principles, followed by the Safety Requirements and Safety Guides. In addition, numerous more specific technical reports are produced to support the Safety Standards. The Safety Standards are developed with the involvement and agreement of all Member States and provide a global reference for nuclear safety. All nuclear organizations in all Member States are encouraged to adopt and implement the principles, requirements and guidance given in the Safety Standards in order to maintain and improve global nuclear safety.

The Safety Standards can be downloaded or ordered from www.iaea.org/safety, under 'List of all valid Safety Standards'.

Under the authority of the Board of Governors, the IAEA and its staff are not responsible for the design or the use of any nuclear facility or for the consequences of the use of any nuclear facility. The IAEA and its staff are not responsible for the design or the use of any nuclear facility or for the consequences of the use of any nuclear facility. The IAEA and its staff are not responsible for the design or the use of any nuclear facility or for the consequences of the use of any nuclear facility.

Challenge

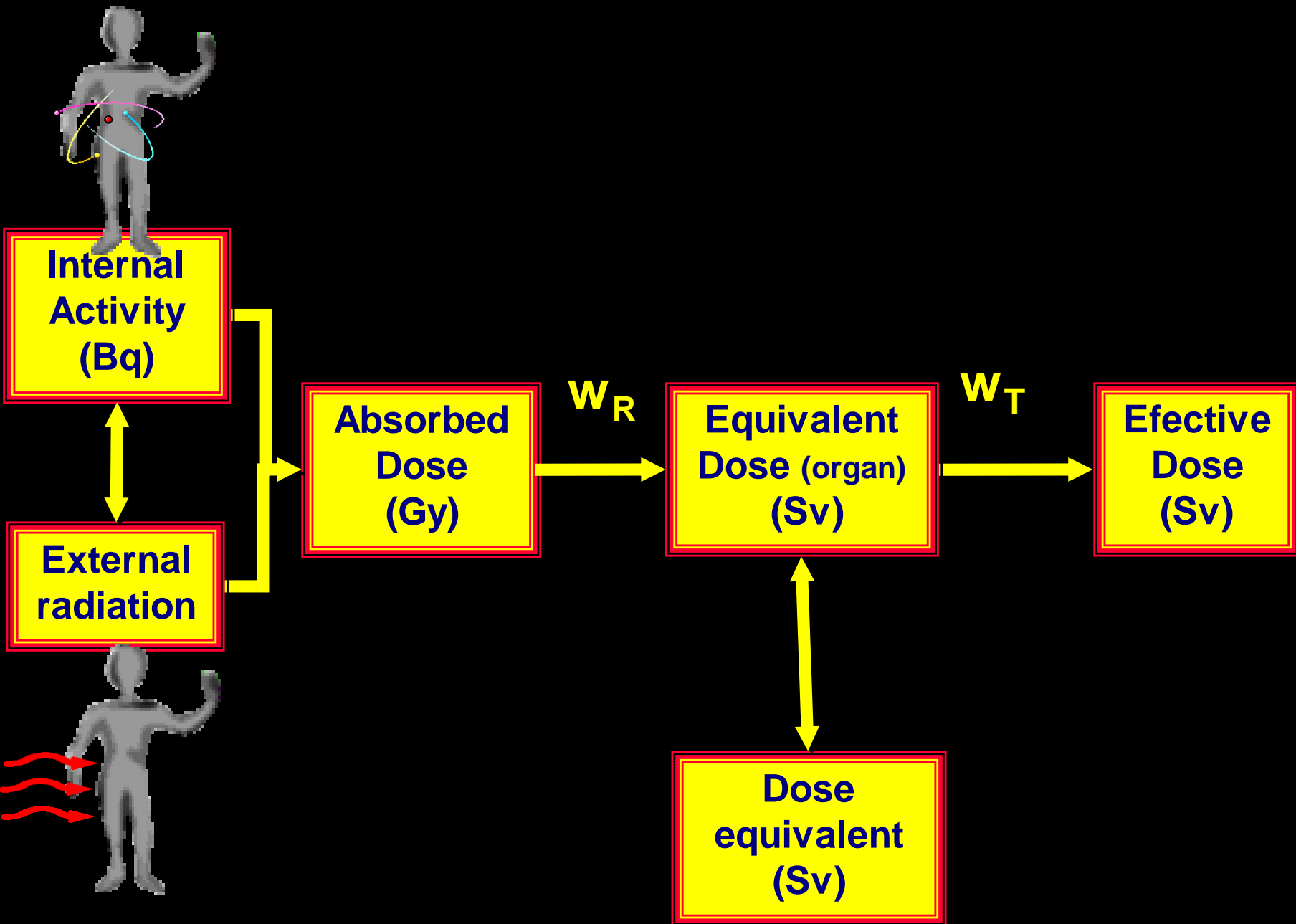
- ❑ Promote quantitative (↓ ‘incentive’) conventions.
- ❑ Convert ‘declarations’ into standards.
- ❑ Depurate norms from standards
- ❑ Establish few fundamental basic standards
- ❑ Expand and specify the corpus of internationally accepted intergovernmental norms

Operational quantities & units

(it cannot be norms without quantities and units)

Mea Culpa

- We have created a sophisticated system of quantities and units that do not respect the basic rules for quantities and units.
- *Interalia:*
 - Many are not directly measurable
 - They are not traceable



Challenge

- The international system of quantities and units need a full review and eventual revision.
- The objective should be measurability, traceability and simplification

**Providing for the applications
of standards & norms**

Mea Culpa

The balance between:

- ▣ **Establishing international standards, and**
- ▣ **Providing for their application**

...has been far from perfect!

More reliance on IRPA



**Provisions
for the
application
of the
standards:
Mechanisms**

```
graph LR; A[Provisions for the application of the standards: Mechanisms] --- B[providing TECHNICAL ASSISTANCE]; A --- C[fostering INFORMATION EXCHANGE]; A --- D[promoting EDUCATION & TRAINING]; A --- E[coordinating RESEARCH & DEVELOPMENT]; A --- F[rendering APPRAISAL SERVICES];
```

providing
TECHNICAL ASSISTANCE

fostering
INFORMATION EXCHANGE

promoting
EDUCATION & TRAINING

coordinating
RESEARCH & DEVELOPMENT

rendering
APPRAISAL SERVICES

Challenge

- ❑ Generalization of technical assistance
- ❑ Increase in information exchange
- ❑ Specific courses for specific standards
- ❑ R & D projects for open issues
- ❑ Appraisals \neq “peer reviews”

5. Epilogue



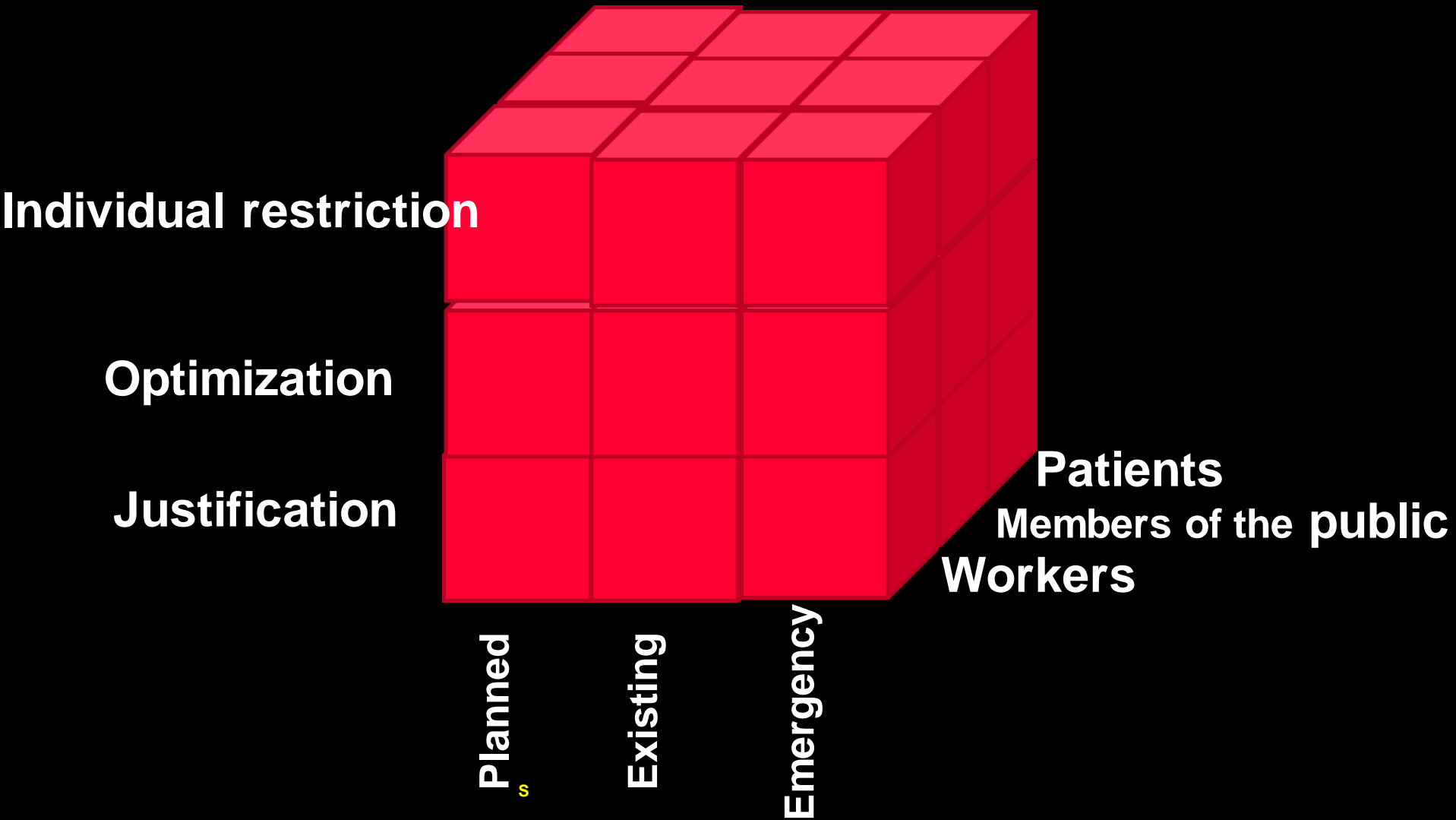
PRESENT

PAST

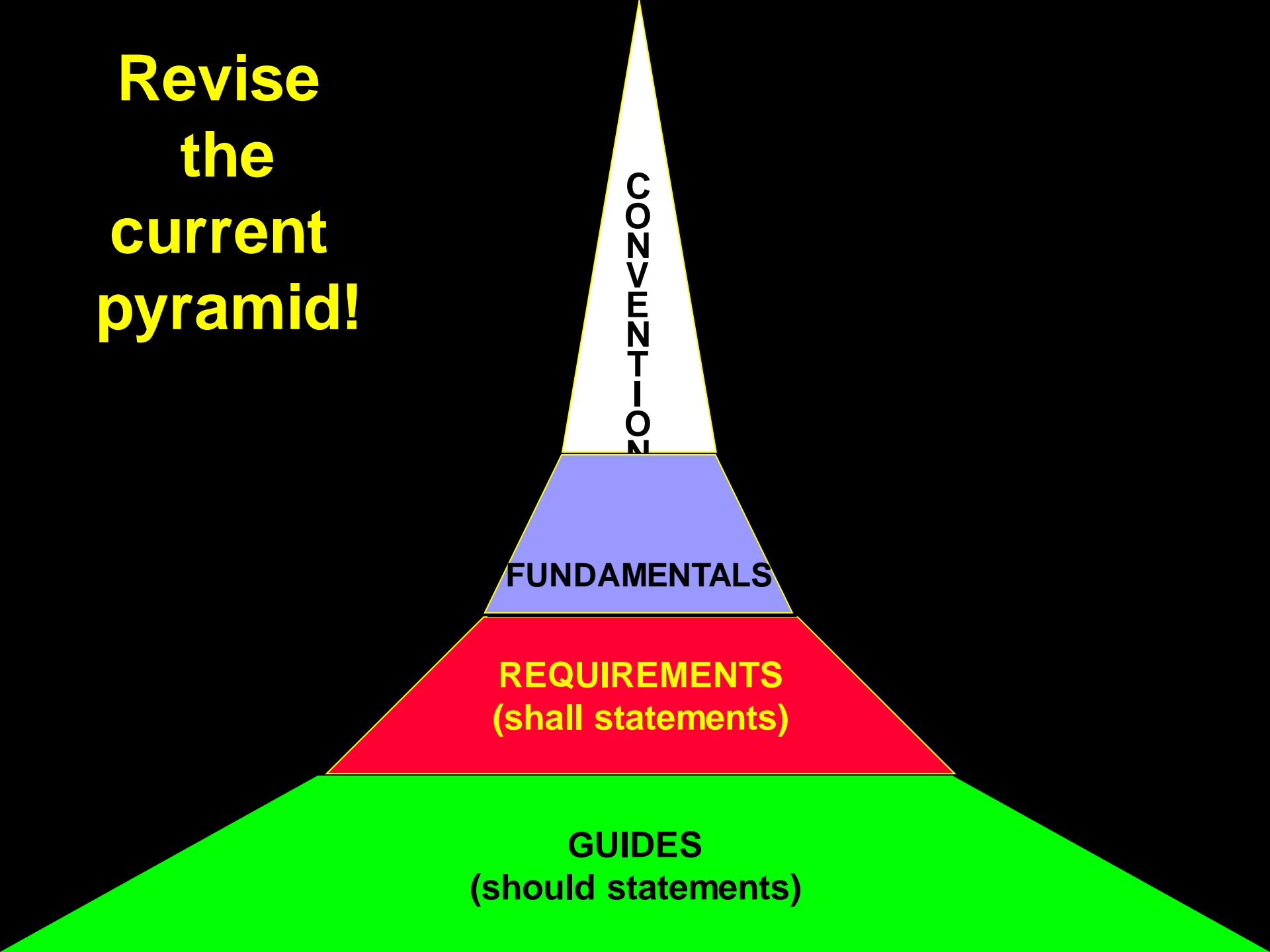
FUTURE

**Key elements to be reviewed
and eventually revised**

A Perfect Rubik's cube?



**Revise
the
current
pyramid!**



Let's improve understanding!



Confusing Words

word

Radiation effects

vis-à-vis

Radiation risk

The risk communication problem

**But this
is the
real
problem!**

Communication



Among experts



Between experts and the public

**This is
difficult**

Risk is a probability

No!..risk is a mathematical expectation

No!..risk is a multiattribute

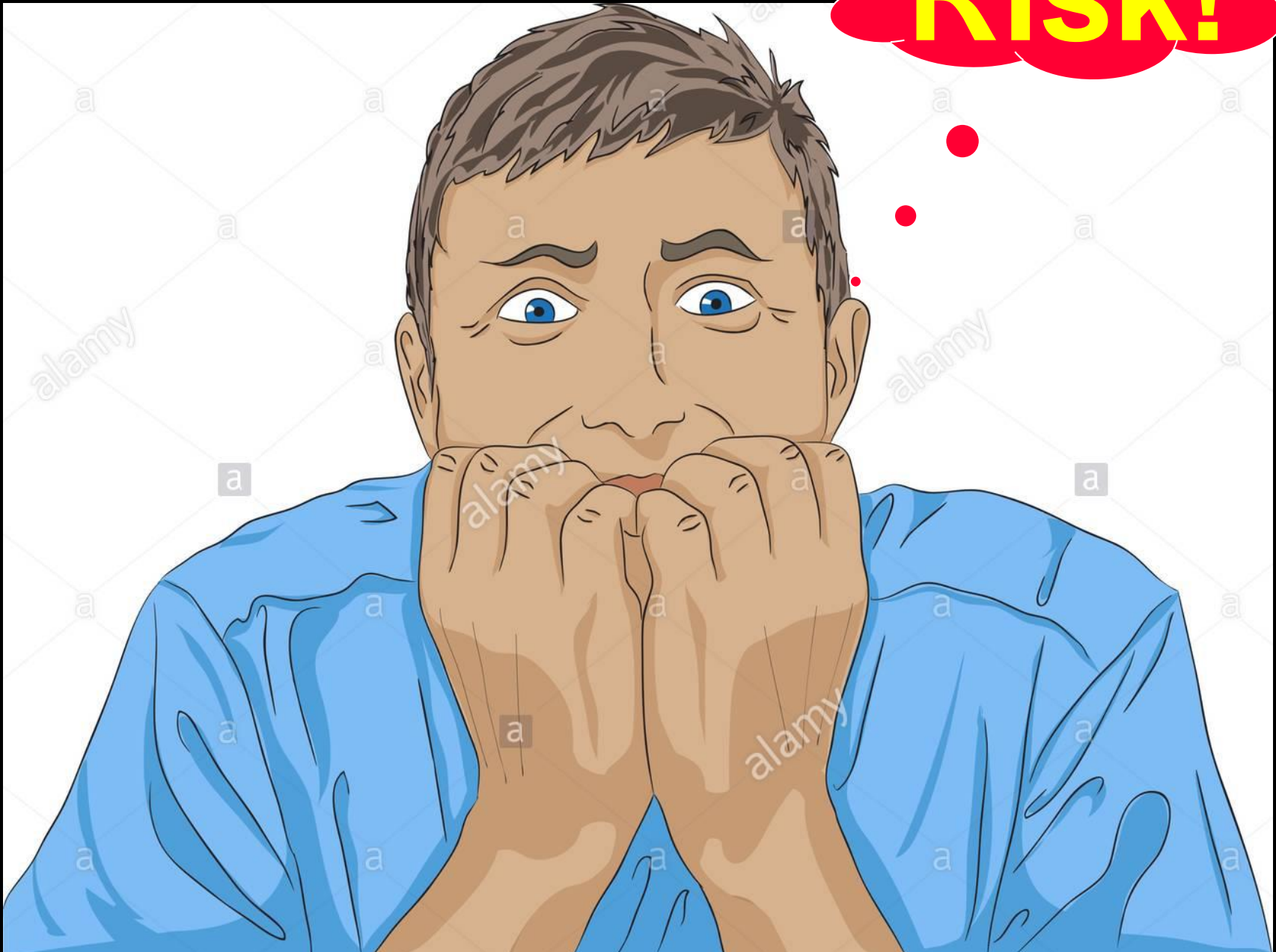
I don't know what risk is



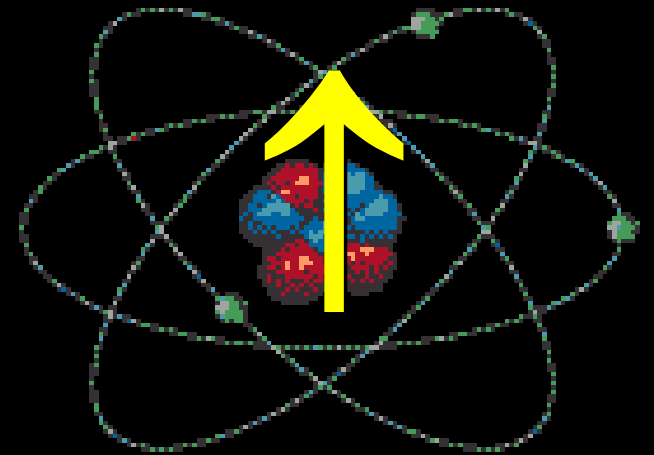
Risk?



Risk!



Exposure to 'natural' radiation

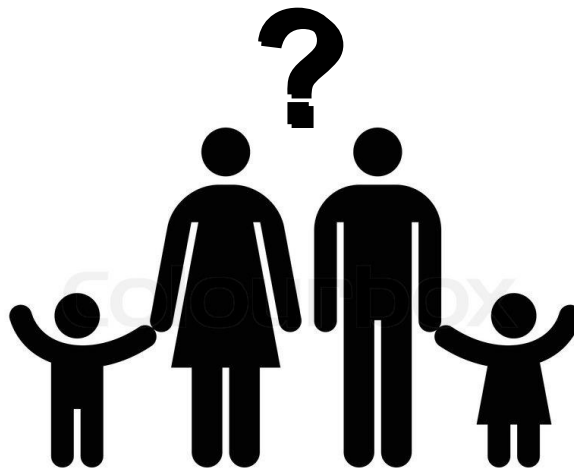




**Sophisticated
system
for controlling
low radiation**



**Limbo for
controlling
high radiation**



The coconut tree is solid!

□ But it seems that....

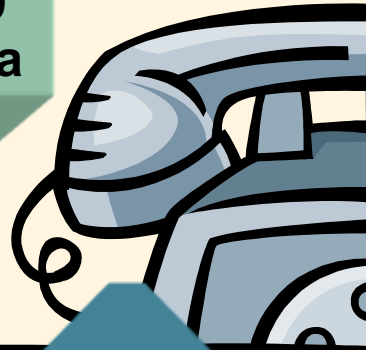


..shacking of the coconut tree could be beneficial!!!

I have no doubt that...
....this is necessary.... and...

...will be done!

Av. del Libertador 8250
Buenos Aires, Argentina



+541163231758

*Thank you for
your tolerance!*

abel_j_gonzalez@yahoo.com

