Dragon, Karen E. (CDC/NIOSH/EID)

From:

Ten-Year-Review-of-the-NIOSH-Radiation-Dose-Reconstruction-Program-Comments

Sent:

Saturday, February 26, 2011 3:03 AM

To:

NIOSH Docket Office (CDC)

Cc: Subject: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
194 - Ten-Year Review of the NIOSH Radiation Dose Reconstruction Program Comments

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Comments

- 1. Post documents used during Advisory Board meetings on website so people participating by phone can have access to the same materials that people physically attending the meeting have.
- 2. There has been much discussion about the super-s classification of high-fired plutonium. What about other high-fired radionuclides? Do they share the same super-s category?
- 3. It does not seem scientific for NIOSH to ignore the lesser used radionuclides in dose reconstructions, particularly during a SEC period.

 Example: a worker with Hodgkin's disease who worked during an SEC period proved exposure to an additional 50 radionuclides. NIOSH evaluated the worker for just the few radionuclides that were common at the site for which the worker had some monitoring data and ignored the additional non-common 50 radionuclides. Claimant was told the dose reconstruction was adequate and that it covered the additional radionuclides because of the overestimate.