## Miller, Diane M.

From:

Alan Fellman PhD CHP [afellman@radtrain.com] Monday, November 05, 2001 3:12 PM NIOCINDOCKET@CDC.GOV comment on 42 CFR Part 82

Sent:

To:

Subject:



RevComment on 42 CFR Part 82.d...

Please see attached file. Thank you.

Alan Fellman

**Radiation Safety Academy** 

Comments on 42 CFR Part 82, Methods for Radiation Dose Reconstruction Under the Energy Employees Occupational Illness Compensation Program Act of 2000; Interim Final Rule With Request for Comments

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Claimants filing for compensation under the EEOICPA consist of persons with potentially fatal cancers. When faced with this type of knowledge, most persons respond with feelings related to two questions: 1) why me?, and 2) how long do I have left before I die? A common human response when a person is confronted with cancer is to look for someone or something to blame for their condition, since clearly they deserve better. In short, these individuals may require counseling that addresses their feelings and fears as much their need to understand the technical aspects of the dose reconstruction and probability of causation process. Most importantly, they will need counseling that helps them address their emotions associated with becoming stricken with cancer and whether their disease is related to occupational radiation exposure.

These needs will not be met under the protocols described in the interim final rule, which call for an average 60-minute initial interview and 5-minute closing interview.