

Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health
Advisory Board on Radiation and Worker Health (ABRWH)
Subcommittee for Procedures Reviews
Meeting Minutes

November 8, 2024

Summary Proceedings

The Subcommittee for Procedures Review meeting convened via teleconference at 11:00 a.m. Eastern Standard Time (EST), Ms. Josie Beach, Chair, presiding.

Attendees

Members

Josie Beach, Chair
Loretta Valerio, Member
Paul Ziemer, Member

Non-Members

Rashaun Roberts, Designated Federal Official
Nancy Adams, NIOSH Contractor
Henry Anderson, ABRWH Chair
Bob Barton, SC&A
Kathy Behling, SC&A
Elizabeth Brackett, ORAU Team
Ron Buchanan, SC&A
Madeline Cook, DCAS
Rose Gogliotti, SC&A
Richard Griffiths, SC&A
Malia Holzberger, HHS
Megan Lobaugh, DCAS
Amy Mangel, SC&A
Lori Marion-Moss, DCAS
Steve Ostrow, SC&A

LaVon Rutherford, DCAS
Muttu Sharfi, ORAU Team
Matthew Smith, ORAU Team
Tim Taulbee, DCAS

Roll Call/Welcome - Dr. Rashaun Roberts, DFO

Dr. Rashaun Roberts called to order the Subcommittee for Procedures Review at 11:00 a.m. EST on November 8, 2024, via teleconference. A roll call of all Subcommittee members confirmed that a quorum was present. The quorum was maintained throughout the meeting. Subcommittee members, federal staff, and contractors announced conflicts of interest during roll call. Member Valerio has connection issues, and member Ziemer will be absent for a period, so the chair will remain attentive to maintaining a quorum. Dr. Roberts turned the meeting over to Ms. Beach, Subcommittee chair. The Subcommittee took up the agenda item for preparation for the December Board meeting first, then addressed some other items before returning to the agenda.

Preparation for December 2024 Full Board Meeting: Review of Technical Guidance Documents Ready for Full Board Approval

Kathy Behling, SC&A, recommended to the Subcommittee that their report of completed reviews to the full Board in December should include six documents rather than eight, as originally planned. The reason is that the length of the presentation would become quite long by including all eight. The six documents that will be included in the Subcommittee's report are: PER-009, OTIB-057, PROC-090, PROC-092, PER-062, PER-017. The Subcommittee agreed with Ms. Behling's recommendation.

Next, Ms. Behling and Lorie Marion-Moss, DCAS, updated the Subcommittee on the status of the new Board Review System (BRS) application. SC&A has almost completed entering data from their temporary tracking system into the new BRS. Ms. Behling, and Ms. Marion-Moss are also discussing some improvements they would like to be incorporated into the new BRS. Specifically, the BRS only has a field for "findings," so both findings and observations appear to be findings in reports from the BRS. They would like the BRS to have an "observations" field in addition to the "findings" field. Additionally, they would like for there to be a way to indicate in BRS that a document was reviewed with no findings. Currently this is done by entering "no findings" in the findings field. Ms. Marion-Moss will be talking to IT about these proposed changes.

Ms. Behling then asked the Subcommittee's consent to changing the description of a PER review from 5 tasks to 4. Task 5 is simply preparing a written report of the Task 4 work, and the written report should be part of Task 4. The Subcommittee agreed.

Carry Over Items from March 14, 2024, SPR Meeting

DCAS-PER-040 "Mallinckrodt TBD Revisions"

LaVon Rutherford, DCAS, explained DCAS's response to the two open observations and SC&A recommended closing them. The chair delayed voting to close the observations until all Subcommittee members were present (Dr. Ziemer was absent at this time). Cases have already been selected for Subtask 4 review.

DCAS-PER-068, “Electro Metallurgical Co.”

Steve Ostrow, SC&A, presented the results of SC&A’s review of PER-068. Dr. Ostrow described the process and history of operations at Electro Metallurgical, as well as its DCAS program history. An SEC was approved for a portion of Electro Metallurgical’s operating period, and the review of the SEC petition led to revisions in the site’s site profile. Those changes were the reason for PER-068. SC&A’s review of PER-068 did not result in any findings at this point. SC&A recommended that two cases be selected for review under Task 4 of the PER review. The Subcommittee concurred and tasked SC&A to review two cases.

DCAS-PER-070, “Nuclear Metals, Inc.”

Amy Mangel, SC&A, presented the results of SC&A’s review of PER-070. Ms. Mangel described the nature and history of Nuclear Metals’s activities, as well as EEOICPA documentation that had been prepared. Two SEC classes have been added for Nuclear Metals workers. DCAS issued PER-070 to assess the impact of publishing a site profile on previously completed claims. SC&A’s review of the PER did not result in any findings, but it did result in seven observations, which sought clarifications or additional information. SC&A recommended that one case be selected for Part 4 review. The Subcommittee concurred and tasked SC&A to review one case. DCAS will respond to the observations at a later meeting.

DCAS-PER-072, “Seymour Specialty Wiring Co.”

Amy Mangel, SC&A, presented the results of SC&A’s review of PER-072. DCAS prepared PER-072 to evaluate the effect of changes in Rev. 1 of the site profile affected the five previously completed claims. Ms. Mangel described the history of covered operations that occurred at Seymour Specialty Wiring. SC&A’s review of PER-072 resulted in one finding and six observations. SC&A recommended that one case be selected for Part 4 review. The Subcommittee concurred and tasked SC&A to review one case. DCAS will respond to the finding and observations at a later meeting.

ORAUT-RPRT-0060, “Neutron Dose from Highly Enriched Uranium”

Dr. Ron Buchanan, SC&A, presented the results of SC&A’s review of RPRT-0060. Dr. Buchanan noted that RPRT-0060 contains much of the same material that is in NIOSH’s 2019 white paper “Neutron Dose Assignment for K-25 and Portsmouth Gaseous Diffusion Plants,” which SC&A had reviewed previously. Dr. Buchanan recounted that, in their review of the 2019 white paper and subsequent exchanges with DCAS, SC&A identified four observations. DCAS resolved one of the observations to SC&A’s satisfaction and SC&A recommends that it be closed. DCAS agreed with two of the observations and intends to resolve them in the next revision of the K-25 and Portsmouth site profiles. The fourth observation pertains to the use of the quantile-regression and Monte Carlo approach (QRA) as the preferred method for assigning neutron doses. SC&A is currently reviewing RPRT-0087, which describes and provides the basis for this approach.

SC&A's review of RPRT-0060 resulted in one finding and two observations. Since the reviews of RPRT-0060 and the 2019 white paper are interrelated, SC&A numbered the observations 5 and 6 to distinguish them from the four observations from the review of the white paper. The Subcommittee voted to close one of the observations from the review of the white paper, in accordance with SC&A's recommendation. DCAS will respond to the remaining finding and observations at a later meeting.

DR Template Reviews – Findings Versus Observations

Kathy Behling, SC&A, presented information about SC&A's review DCAS's technical guidance for performing dose reconstructions for sites that don't have site profiles. For such claims, DCAS has prepared a Dose Reconstruction Methodology document and a Dose Reconstruction Template. The template contains possible approaches to the dose reconstruction that can be selected based on the facts of the case. The methodology document contains guidance that can assist dose reconstructors in using the template. It is SC&A's position that, to ensure consistency, DCAS should specify a single document as the definitive technical guidance for dose reconstructions. DCAS's view that the completed dose reconstructions are the only official documents from sites without site profiles leads to the conclusion that all dose reconstructions from those sites should be reviewed to ensure consistency. Ms. Behling then described how SC&A will categorize issues identified during reviews as findings or observations.

During discussion no one thought the Subcommittee would be able to, or should, review all the claims from sites without site profiles. It was decided that SC&A would review five cases from Albuquerque Operations Office and ten cases from the Amchitka Island Nuclear Explosion Site. Those were the two sites which SC&A is currently reviewing.

Newly-issued SC&A Reviews

ORAUT-RPRT-0087, "Applications of Regression in External Dose Reconstruction"

Because of the limited amount of time remaining, the Subcommittee decided to take up this agenda item next. Dr. Richard Griffiths, SC&A, described the results of SC&A's review of this document, which describes using quantile regression to impute unknown doses of one type of radiation from known doses of another type of radiation. RPRT-0087 purports that quantile regression (QR) is an improvement over regression on order statistics, which the program had generally used previously. While SC&A agrees that quantile regression (QR) is a useful regression method, they note that there are other methods that may be better suited for some data sets. SC&A's view is that, as a reference, RPRT-0087 should include other methods and provide guidance about the factors that might affect the choice of method. Additionally, it should consider how to quantify the precision of the estimates that come from these methods.

Dr. Griffiths described quantile regression, and how it differs from linear regression and explained the bases for SC&A's eight observations from their review. DCAS will prepare responses to those observations.

ORAUT-OTIB-093, “Conversion of Committed Effective Dose to Annual Organ Dose”

Rose Gogliotti, SC&A, presented the results of SC&A’s review of ORAUT-OTIB-093. This document describes the method for converting site-recorded Committed Effective Dose values to radioactive material intake, and from that to annual organ doses. SC&A did not have any comments on the document but felt that the Board should be aware each time it is used. The Subcommittee voted to close this review.

Newly Issued Guidance Documents and Supplemental Topics

Since the ending time for the meeting was approaching the Subcommittee moved on tasking SC&A to perform additional document reviews. Kathy Behling, SC&A, presented a list of documents that have not yet been reviewed. From that list, The Subcommittee tasked SC&A to review the following documents:

- DCAS-PER-088, rev. 0
- DCAS-PER-089, rev. 0
- DCAS-PER-090, rev. 0
- ORAUT-OTIB-0076
- ORAUT-OTIB-0080
- ORAUT-OTIB-0084
- ORAUT-OTIB-0092

Meeting Adjourned

The Subcommittee selected March 21, 2025, as the preferred date for the next meeting. The meeting was adjourned at 4:10 pm Eastern Standard Time.