

OCAS-PER-030, Subtasks 1–3
EVALUATION OF SAVANNAH RIVER
SITE (SRS) TBD REVISIONS

SC&A Report Dated July 1, 2013

Presented to the
Advisory Board's Procedures Review Subcommittee
November 7, 2013

OCAS-PER-030 Summary

- PER-030 (2007) was issued to address several changes in the SRS TBD (ORAUT-TKBS-0003):
 - 07/15/2003, Rev. 00
 - 08/21/2003, Rev. 01
 - 10/29/2004, Rev. 02
 - 04/05/2005, Rev. 03
- In addition, the Occupational Medical Dose Section was revised as a separate document and issued on November 30, 2009, Rev. 04.

NIOSH Issues

- The TBD changes could potentially increase assigned dose to claimants whose claims had previously been processed, with a resulting probability of causation (POC) <50%, using an earlier version of the SRS TBD because of the following revisions:
 - A reduction for 1.5 L recorded bioassay should not be applied
 - Environmental plutonium and uranium headings transposed in table

NIOSH Issues (continued)

- Use 2,500 hours per year environmental exposure
 - Revised Environmental Plutonium Intakes
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- The Occupational Medical Dose section was revised in 2009, after PER-030 was issued in 2007.

NIOSH's Corrective Action

- NIOSH provided a plan of corrective action to resolve the issues created by the revisions (as of 2007) by requesting that the claims impacted by the revisions be returned for a new dose estimate.

NIOSH Number of Claims

- NIOSH identified 54 SRS claims with a POC <50% that were potentially impacted due to the issuance of the August 21, 2003, TBD revision.
- NIOSH stated that the changes in the 2004 and 2005 revisions were *phase implementations* (i.e., there were reserved sections where additional recommendations were later added) and impacted claims were held until these sections were completed.

SC&A's Subtasks 1 & 2

- SC&A performed a paragraph-by-paragraph comparison of each TBD revision to the former TBD (i.e., SC&A compared Rev. 01 of August 21, 2003, to the contents of Rev. 00, July 15, 2003, etc.) to determine if there were any changes in the later revision that could potentially increase the assigned dose.

SC&A's Subtasks 1 & 2 (continued)

- SC&A did not locate any changes in the TBDs through 2007 that would potentially increase the assigned dose, except the issues previously listed above, as addressed by OCAS-PER-030.
- SC&A evaluated the revised Occupational Medical Dose section of 2009 and found that there were changes that could increase the assigned dose.

SC&A Finding #1

- **Finding #1: Concerns with Phased Implementation** – What documentation is available to verify that the SRS claims that were held waiting for the reserved sections to be completed were (or will be) evaluated when the new information became available?

SC&A Finding #2

- **Finding #2: 2009 Revised Occupational Medical Dose Section** – Considering that there were significant changes in Rev. 04, it appears that an additional PER concerning Rev. 04 of the SRS Occupational Medical profile would be appropriate.

SC&A's Subtask 3 (Number of claims)

- SC&A used the NOCTS database system to verify that there were 54 SRS claims impacted by OCAS-PER-030. It is recommended that SC&A review the 54 claims as described in Subtask 4 below.

SC&A's Subtask 4

Selection of DRs to Audit

- NIOSH has completed the evaluation of the 54 potentially impacted claims under OCAS-PER-030 and found *none* met one or more of the four TBD changes/criteria that would affect dose.

Selection of DRs to Audit (continued)

- It is recommended that SC&A sample the 54 applicable claims and evaluate some of them to verify that changes in the SRS TBD did not impact the dose assignments as per criteria set forth in OCAS-PER-030.
- SC&A recommends that at least 5–15 claims be subjected to this detailed analysis.

Questions?