ADVISORY BOARD ON RADIATION AND WORKER HEALTH

1150 Tusculum Ave
Cincinnati, Ohio 45226
(513) 533-6825

October 25, 2017

The Honorable Eric D. Hargan
Acting Secretary
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Acting Secretary Hargan:

The Advisory Board on Radiation and Worker Health (The Board) has evaluated SEC Petition-00238 concerning workers at the Idaho National Laboratory under the statutory requirements established by EEOICPA and incorporated into 42 CFR Sec. 83.13.

The Board respectfully recommends that SEC status be accorded to:

> "All employees of the Department of Energy, its predecessor agencies, and their contractors and subcontractors who worked at the Idaho National Laboratory (INL) in Scoville, Idaho, and who were monitored for external radiation at the Idaho Chemical Processing Plant (CPP) (e.g., at least one film badge or TLD dosimeter from CPP) between January 1, 1975, and December 31, 1980, for a number of work days aggregating at least 250 work days, occurring solely under this employment, or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort."

This recommendation is based on the following factors:

- The primary function of the INL CPP during the period in question was processing spent fuel elements containing enriched uranium in order to recover un-fissioned uranium.

- Principal sources of internal radiation for members of the proposed class may have included exposures to uranium, mixed fission and activation products (MFP/MAP), exotic radionuclides (produced from, or as a result of, reactor neutron irradiation), and transuranic radionuclides. Potential exposures would likely be from inhalation and ingestion during processing operations.

- Routine monitoring of potential internal intakes of radionuclides was limited during this time period.

- NIOSH's review of available monitoring data, as well as available process and source term information for this facility found that NIOSH lacked the sufficient information to allow it to estimate with sufficient accuracy the potential internal doses from exposure to transuranic radionuclides, to which employees working at this facility may have been subjected. The Board concurs with this determination.

NIOSH determined that health may have been endangered for the workers from chronic intakes to radionuclides during the time period in question. The Board also concurs with this determination.

Based on these considerations and the discussions held at our August 23 to 24, 2017, Advisory Board meeting in Santa Fe, New Mexico, the Board recommends that this class be added to the SEC.

Enclosed is the documentation from the Board meeting(s) where this SEC class was discussed. The documentation includes copies of the petition, the NIOSH review thereof, and related materials. If any of these items are unavailable at this time, they will follow shortly.

Sincerely,

[Signature on File]

James M. Melius, M.D., Dr. PH.
Chairman, ABRWH

Enclosure