Miller, Diane M.

From:

Barncord, J. David_

Sent:

Tuesday, November 16, 2004 10:14 AM

To:

NIOSH Docket Office

Cc:

Barncord, J. David

Subject: ORNL Site Profile Comments

I would like to make a comment on the site profile at ORNL. In the profile, there is a very small amount of information about buildings 4500 South and 4500 North. These buildings have in the past and are presently used in bench top type research. Granted, they would pose little exposure to the researcher doing the small scale work but they would however, pose a risk to the maintenance worker. The maintenance staff was and is responsible for all utilities in these buildings which includes the hot and process drains. When these drains did not work properly they were repaired by the maintenance workers. This maintenance also included the building ventilation system. The HEPA filtered chemical hoods and the RAD ventilation systems were a major source of exposure to the maintenance worker.

I would also like to explain how people were assigned to work areas. It may show up on someone's work history that they were assigned to a certain building but that can be very misleading. I myself worked in a building that when looked up on the site profile, would appear as a clean building. However all the maintenance that was performed on the ORNL site radiological waste lines were done by personnel from this maintenance shop. Please understand that we had central maintenance shops that were responsible for maintenance all over ORNL. It would not be correct to assume that because a worker was not assigned to a certain building that he or she did not actually do work in that particular building. The issue of overtime must also be considered. Workers from all over the plant site are asked to work overtime on any particular job. A worker that would normally work in a clean area could in fact receive an exposure on an overtime job. I understand this would be very difficult to capture in the site profile but I feel it should be a consideration when calculating a workers potential for exposure.

Finally, I would like to comment on the type of work done at ORNL. Being a research facility, we did not have what would be called a production type atmosphere. The types of projects in the different buildings changed with the availability of funding. The research projects being done in a certain part of a building with whatever hazardous material that was being used could change many many times during the career of a maintenance worker. Chemicals changed, radioisotopes changed but the maintenance workers remained the same.

Thank you for the opportunity to comment,

Dave Barncord

Dave Barncord

ATLC ES&H Representative