Office of Compensation Analysis and Support

Program Evaluation Report

Document Number: OCAS-PER-017

Effective Date: 9/11/2007

Revision No. 0

Evaluation of Incomplete Internal Dosimetry Records from Idaho, Page 1 of 3 **Argonne – East and Argonne – West National Laboratories**

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RECORD OF ISSUE/REVISIONS						
ISSUE AUTHORIZATION DATE	EFFECTIVE DATE	REV. NO.	DESCRIPTION			
9/11/2007	9/11/2007	0	New document to determine which previously completed claims require revisions as a result of new dosimetry data at INL, ANL-E, and ANL-W.			

1.0 <u>Description</u>

In April/May 2006, while reviewing dose reconstructions (DR) for an Idaho National Laboratory (INL) case and an Argonne National Laboratory – East (ANL-E) case, a particular notation ("no recordable dose") in the INL dosimetry response, as well as a similar notation ("no internal dose") in the ANL-E dosimetry response, was questioned. Both the INL and ANL-E points of contact (POC) were contacted and asked if this notation meant that the energy employee (EE) was not monitored. The INL POC responded that this notation meant that this particular EE may have been monitored but no internal dose was assigned. The ANL-E POC provided information that the EE had internal dose records for most years of his employment. [Although Argonne National Laboratory – West (ANL-W) requests are sent thru the Chicago Operations Office, the dosimetry records are provided by INL.]

In May/June 2006, it was determined that INL/ANL-W/ANL-E did not consistently include internal dose data in all of their individual dosimetry responses and that additional requests were needed for submitted/non-compensable cases. For a particular employee, INL/ANL-W/ANL-E either provided all or none of the EE's internal dosimetry records. The indication that there may be internal dosimetry data not submitted to NIOSH is that the OCAS-INT-004 (check-box form) has a hand-written note next to the internal dosimetry status section that says – "no internal dose" or "no recordable dose."

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2.0 <u>Issue Evaluation</u>

In July/August 2006, all INL/ANL-W/ANL-E submitted/non-comp cases were reviewed to determine if additional requests were needed. At that time, there were 603 INL, 64 ANL-W and 56 ANL-E submitted/non-comp cases. Since the middle of 2006, several of the cases were submitted to DOL (either before or after the receipt of the additional response). As of 1/24/2007, there were 677 INL, 87 ANL-W and 69 ANL-E submitted/non-comp cases. Each case was reviewed to determine:

- how the internal dosimetry status section on the OCAS-INT-004 was completed (not marked; or marked as provided, not readily available, or does not exist),
- if a hand-written note was indicated on the form (no internal dose/exposure, no recordable dose, no monitoring required, not monitored, etc.), and
- if internal dose records (in-vivo or bioassay records) were provided within the response.

Based on the information resulting from this review, it was determined that additional requests were needed for INL/ANL-W/ANL-E cases that met one of the following criteria:

- the OCAS-INT-004 was marked as internal dosimetry records provided with or without a hand-written note stating "no internal or recordable dose," <u>and</u> there were no internal dose records in the response,
- the OCAS-INT-004 was marked as internal dosimetry records not readily available with or without a hand-written note stating "no internal or recordable dose," <u>and</u> there were no internal dose records in the response, or
- the OCAS-INT-004 had no markings or notations, <u>and</u> there were no internal dose records in the response.

For INL/ANL-W, some responses contained notes stating that the EE was not monitored or that the records show no record of the EE being monitored or receiving dose at INL/ANL-W. These notes may appear on either the OCAS-INT-004 or on a memo within the response. Additional requests were not generated for cases when this information was provided within the response.

For ANL-E, some responses contained additional notes on a memo within the response such as data was not available, minimal dose based on bioassays, no internal doses assessed, etc. Additional requests were generated when these notations occurred within the response. Also, some responses contained notes stating that the EE was not monitored, that no internal radiation exposure records were on file, or that no bioassay records were found. These notes may appear on either the OCAS-INT-004 or on a memo within the response. Additional requests were not generated for cases when this information was provided within the response.

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3.0 Plan for Resolution or Corrective Action

Additional requests were sent in August/September 2006. By April of 2007 a response was received for each of the request. These requests resulted in receiving internal dose data for 83 claims, 62 from INL, 14 from ANL-W, 6 from ANL-E and one with additional records from both INL and ANL-W.

Some of these claims have already been returned to NIOSH for new dose reconstruction for various reasons. The new dose reconstructions will consider the new data received. NIOSH is requesting the remaining claims be returned for a new dose reconstruction. This consists of 68 individual claims. A list of these claims will be forwarded to the Department of Labor. A new dose reconstruction will be completed for each of the claims using the new data.