

Dragon, Karen E. (CDC/NIOSH/EID)

From: DanMcKeel2@aol.com
Sent: Monday, May 21, 2012 4:25 PM
To: NIOSH Docket Office (CDC)
Cc: danmckeel2@aol.com
Subject: Docket 140 GSI: PETITIONER DOCUMENTS 3-8
Attachments: McKeel_ADD3.pdf+.zip

Dear NIOSH Docket 140 (GSI) Office:

Attachment: DOCUMENT 3: <McKeel_ADD3.pdf> (288 KB)
Attachment: DOCUMENT 4: <MCNPx_memo_3.22.12.pdf> (73 KB)
Attachment: DOCUMENT 5: <McKeel_Comment_Allen2_ADFD3.pdf> (477 KB)
Attachment: DOCUMENT 6: <McKeel_Part2_Allen_ADD-3.pdf> (411 KB)
Attachment: DOCUMENT 7: <McKeel_Comment_3.28.12.pdf> (76 KB)
→ Attachment: DOCUMENT 8: <DWM_GSI_email_Katz_4.26.12.pdf> (36 KB)

Please accept this submission to GSI Docket 140 for posting on the DCAS website. There are 6 small PDF files representing 6 separate communications from myself to the TBD-6000 work group and full Board.

Descriptions:

MCKEEL PETITIONER DOCUMENT 3. FILE: McKeel_ADD3.pdf (288 KB), dated March 19, 2012. Covers unresolved SC&A "SEC Issues" 5 and 6 as well as more realistic and time period-accurate surrogate concrete induced radioisotope activation data by the GSI Betatrons.

MCKEEL PETITIONER DOCUMENT 4. FILE: MCNPx_memo_3.22.12.pdf (76 KB); McKeel Email dated 3/22/12 to Ted Katz to distribute to TBD-6000 work group, DCAS and SC&A containing John Ramspott information about MCNPx with Dan McKeel comments.

MCKEEL PETITIONER DOCUMENT 5. FILE: McKeel_Comment_Allen2_ADFD3.pdf (480 KB) dated 3/23/12. 2 page initial reaction to mistaken calculations in David Allen's Addendum 3 action items white paper following the 3/15/12 TBD-6000 work group meeting.

MCKEEL PETITIONER DOCUMENT 6. FILE: McKeel_Part2_Allen_ADD-3.pdf (411 KB) dated 3/26/12. A critically important document showing that layout worker photon and neutron external radiation doses should be increased based on new knowledge they worked immediately outside the GSI new Betatron shooting room shielded only by a thin steel ribbon door that offered scant protection to them.

MCKEEL PETITIONER DOCUMENT 7. FILE: McKeel_Comment_3.28.12.pdf (80 KB) dated 3/28/12. McKeel read into the record of the 3.28.12 TBD-6000 work group meeting. Very important rebuttal to the DCAS and SC&A presentations at the same meeting.

MCKEEL PETITIONER DOCUMENT 8: FILE (PDF of email): DWM_GSI_email_Katz_4.26.12.pdf (40 KB) dated 4/26/12. McKeel added comments about the TBD-6000 work group 2 Yes (Ziemer, Munn), 1 No (Josie Beach, 1st ten years of covered period) recommendation on 3/28/12 to support NIOSH and to deny the GSI SEC-00105 petition for the entire covered period of 1953-June 1966.

Sincerely,

-- Dan McKeel May 21, 2012

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Subj: Request to distribute: TBD-6000 work group information to full Board
Date: Thursday, April 26, 2012 3:09:49 PM
From: DanMcKeel2@aol.com
To: tmk1@cdc.gov
cc: danmckeel2@aol.com

Ted Katz, ABRWH DFO

April 26, 2012

Dear Ted and members of the Advisory Board on Radiation and Worker Health (ABRWH),

[Please distribute the following information to all members of the full Board]

The following information applies to Paul Ziemer's brief report on the activities of the TBD-6000 work group to the full Board at today's 4/26/12 ABRWH teleconference meeting.

1. The TBD-6000 work group has been considering SEC-00105 for General Steel Industries (GSI) since October 2008. This WG is also charged with assessing and helping NIOSH revise Appendix BB, Rev 0 (June 2007) that applies to GSI as an AWE site that processed uranium metal. The parent technical document is TBD-6000; Rev 1 was released last year.
2. The TBD-6000 work group held very unusual back-to-back meetings on 3/15/12 and 3/28/12. Dan McKeel, SEC-00105 co-petitioner, was allowed to address the WG, in person, using his own Powerpoint that is now posted on Docket 140 for over an hour during the 3/15 informational meeting. McKeel was also allowed to comment by phone on the SC&A Powerpoint presentation and NIOSH's comments to the WG on 3/28/12. At both meetings, McKeel provided many detailed reasons why NIOSH's recommendation to deny the GSI SEC-00105 were in his view scientifically indefensible, including lack of model validity by real (measured) data, too limited personal monitoring data (no intake data for the 13 years) on one job (radiographer, men only, for only three years) for less than 0.7% of man-years covered, and almost total lack of necessary records dealing with uranium radiography sources and practice. Uranium AEC-Mallinckrodt purchase orders existed for 1958-66 but not earlier). McKeel showed that NIOSH had neglected to bound doses from several radiation sources at GSI (Ir-192, 80 curie Co-60 source, [2] portable industrial x-ray machines) used at the site for nondestructive testing. He showed examples of gross disparity between the GSI safety program as described in the AEC license application and actual safety procedures as described by numerous eye witness GSI former workers, and much more. McKeel took strongest exception to the rationale by which SC&A reversed its previous position that an SEC was inevitable for the first ten years at GSI because of the paucity of monitoring data and records pertaining thereto. The SC&A position had suddenly become that the internal and external radiation doses could be bounded for all 13 years based on very limited circumstantial data that one WG member described as "flimsy." Near the end of the 3/28/12 WG meeting, one SC&A member actually asked if he could change his SEC-0015 recommendation.
3. After McKeel commented on 3/28/12, the WG headed by Dr. Ziemer moved to rapidly transfer all SEC issues to become Appendix BB issues. There was little discussion of why these moves were done, when the WG had been discussing the issues for YEARS literally without resolving them with SC&A and NIOSH. **SEC ISSUE #1 was the question of whether an SEC should be recommended for the first ten years or parts thereof, for which there was no or very scant personal monitoring data. The three work group members present split: Dr. Ziemer**

and Wanda Munn voted "YES" to uphold NIOSH's recommendation to deny the GSI SEC for the entire 13 year covered period, while Ms. Beach voted "NO," stating the evidence for bounding was "too skimpy." For some reason, Dr. Ziemer left out this very important detail during his report to the full Board this morning.

4. Also of note, TBD-6000 WG member Dr. John Poston did not participate in any of the last 4 TBD-6000 work group sessions. Mark Griffon, the fifth member, had apparently resigned as a member although he is still listed on the DCAS website. Ms. Munn is listed as an Alternate member on the DCAS website.

5. It is unclear to GSI SEC co-petitioner McKeel why Lavon Rutherford did not state that SEC-00105 would be discussed at the June Board meeting in Santa Fe. Dr. Ziemer indicated he hoped SEC-105 would be ready to present, and indicated the WG would have to meeting again to vote on extending the SEC to the residual period at GSI. That subject, to McKeel's knowledge, has not even been broached by the TBD-6000 or preceding TBD6000/6001 and Appendix BB work groups.

6. Finally, the GSI petitioners, site experts and former workers have entered into the GSI record large amounts of new data that will affect the conduct and POC outcomes of GSI initial and "rework" dose reconstructions. It has been almost 5 years since the WG has been considering Appendix BB. There still remain substantial now Appendix BB, formerly SEC issues, that need to be resolved between NIOSH and SC&A. It is discouraging that no TBD-6000 work group meeting is currently scheduled to address the complex "Appendix BB issues" that co-petitioner McKeel still regards as valid SEC issues.

Sincerely -- Dan McKeel

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