

**Division of Compensation Analysis and  
Support  
Program Evaluation Report**

Document Number: DCAS-PER-088

Effective Date: 11/12/2019

**Pacific Proving Ground**

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Author: Signature on file Date: 11/12/2019 Supersedes: none  
Dave Allen, HP Team Leader

Approval: Signature on file Date: 11/12/2019  
T. Taulbee, Associate Director for Science

**RECORD OF ISSUE/REVISIONS**

<b>ISSUE AUTHORIZATION DATE</b>	<b>EFFECTIVE DATE</b>	<b>DESCRIPTION</b>
11/12/2019	11/12/2019	New document to determine the effect of issuing revision 3 to ORAUT-TKBS-0052 (Pacific Proving Ground TBD) on previously completed claims.

**1.0 Description**

Revision 3 of the Technical Basis Document (TBD) for the Pacific Proving Ground (PPG) (ORAUT-TKBS-0052) was issued on 1/3/2019. Prior to that, three other revisions were issued (revisions 2, 1 and 0) on 7/23/2019, 7/11/2016 and 8/30/2006 respectively. On 6/26/2006 the Secretary of Health and Human Services designated PPG a member of the SEC for the entire covered period (1946 to 1962).

The effect of issuing revision 3 of the TBD on all previously completed claims is the subject of this PER.

**2.0 Issue Evaluation**

Increases in dose due to revision 3 of the TBD include the following issues.

The original TBD was issued soon after the SEC designation. In 2016, revision 1 of the TBD designated that the 95<sup>th</sup> percentile of the coworker dose would be used to account for several sources of uncertainty. Revision 1 also included a change in the way beta to gamma ratios would be used to account for non-penetrating doses as well as accounting for unmonitored dose from fallout.

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Revision 2 of the TBD reevaluated the coworker data based on actual film badge data rather than the range-tabulated data previously used. Revision 3 designated the assumption that fallout was fresh rather than weathered for all years in which operations were conducted. This revision also applied a coworker dose from the nearest year for those years in which no operational data existed.

These changes affect most people employed at the PPG site and as such, no populations of claims could be excluded from evaluation based on them being unaffected by the latest changes. All claims associated with the PPG site were considered.

### **3.0 Plan for Resolving Corrective Action**

A search of the NIOSH Claims Tracking System (NOCTS) database was combined with a text search of the dose reconstruction reports of previously completed claims. The NOCTS search queried employment at PPG while the text search queried the keyword "Pacific Proving Ground." The combined search resulted in a total of 316 claims.

The population of claims was reduced by first removing 78 claims that had been pulled from dose reconstruction. Most of these were pulled because they had met the criteria for compensation under the SEC prior to a dose reconstruction being completed.

One additional claim was removed from the list because it had been returned to NIOSH for a new dose reconstruction and that dose reconstruction would be done according to revision 3 of the TBD.

An additional 89 claims were removed because the original dose reconstructions resulted in a probability of causation greater than 50%. Therefore, no increase in dose would affect eligibility for compensation.

Twenty-one claims met the criteria for compensation under the SEC and there was no other reason for performing a dose reconstruction. These differ from those pulled for the SEC in that dose reconstruction had been completed prior to the SEC designation.

Lastly, 29 claims were removed because they had no PPG employment or visits during the covered period. The claims were included in the original population because the Pacific Proving Ground was mentioned in the text of the dose reconstruction.

Dose for the remaining 98 claims was recalculated using revision 3 of the TBD as well as all other applicable procedures. For those claims in which the probability of causation fell between 45% and 52%, IREP was run 30 times with 10,000 interactions for each run in accordance with NIOSH procedures.

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The resulting probability of causation for the 98 claims was less than 50% for 89 claims and greater than 50% for the remaining 9 claims.

NIOSH will provide the Department of Labor with the list of all the claims evaluated under this PER. Further, NIOSH will request that the Department of Labor return the 9 claims that resulted in a probability of causation greater than 50% to NIOSH for a new dose reconstruction.