



## ADVISORY BOARD ON RADIATION AND WORKER HEALTH

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January 2, 2007

The Honorable Michael O. Leavitt  
Secretary of Health and Human Services  
Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, DC 20201

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Dear Mr. Secretary:

The Advisory Board on Radiation and Worker Health (The Board) has evaluated SEC Petition-00066 concerning workers at the Harshaw Harvard-Denison Plant located at 1000 Harvard Avenue in Cleveland, Ohio under the statutory requirements established by EEOICPA and incorporated into 42 CFR Sec. 83.13 and 42 CFR Sec. 83.14. The Board respectfully recommends a Special Exposure Cohort (SEC) be accorded to all Atomic Weapons Employees who were monitored, or should have been monitored, while working at the Harshaw Harvard-Denison Plant located at 1000 Harvard Avenue in Cleveland, Ohio for a number of work days aggregating at least 250 work days during the period of August 14, 1942 to November 30, 1949, or in combination with work days within the parameters established for other classes of employees included in the SEC. The Board notes that although NIOSH found that they were unable to completely reconstruct radiation doses for these employees, they believe that they are able to reconstruct components of the internal and external dose, and therefore individuals with non-presumptive cancers may be considered for partial dose reconstructions.

This recommendation is based on the following factors:

- People working in the Harshaw Harvard-Denison Plant were exposed to radiation from the production and processing of uranium compounds from 1942 to 1955. In reviewing the available monitoring and other data for these operations, NIOSH found that it did not have access to sufficient information, including personnel dosimetry, workplace monitoring data, or sufficient process and radiological source information, that would allow it to estimate with sufficient accuracy the internal doses resulting from non-uranium nuclides for the period from August 14, 1942 through November 30, 1949. The Board concurs with this determination.

- NIOSH determined that health may have been endangered for the workers exposed to radiation at the Harshaw Harvard-Denison Plant in Cleveland, Ohio within the time period in question. The Board concurs with this determination.

Enclosed is supporting documentation from the recent Advisory Board Meeting held in Naperville, Illinois where this special exposure cohort was discussed. If any of these items are unavailable at this time, they will follow shortly.

Sincerely,

A handwritten signature in black ink, reading "Paul L. Ziemer". The signature is written in a cursive style with a prominent flourish at the end.

Paul L. Ziemer, Ph.D.  
Chairman

Enc.