

Miller, Diane M. (CDC/NIOSH/EID)

From: antbonsignore@gmail.com
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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 194 - Ten-Year Review of the NIOSH Radiation Dose Reconstruction Program Comments

Name

Antoinette Bonsignore

Organization

Linde Ceramics SEC Action Group

Email

antbonsignore@gmail.com

Address

16191 NE 83rd Street #C413
Redmond, WA 98052
United States

Comments

Worker advocates have long believed that DCAS is predisposed to favor the individual dose reconstruction program over granting SECs. DCAS's predisposition to deny SECs in favor of the individual dose reconstruction program has been wholly supported by the recent SEC review report issued by Randy Rabinowitz for the EEOICPA Ten Year Review. Specifically, Ms. Rabinowitz concludes in the report that:

"NIOSH Policy Favors Individual Dose Reconstruction over SEC Approval: The SEC regulations state that NIOSH's goal is "uniform, fair, scientific consideration" of SEC petitions. But the policy NIOSH adopted favors [sic] creates a preference for completing dose reconstructions over approving additional SECs, even where little actual monitoring data from a site exists or obtaining such data requires a large expenditure of resources or a long delay"

Worker advocates urge NIOSH to investigate the conclusions reached within this report thoroughly and consider the impact of those conclusions on the pressing question of whether NIOSH and DCAS are fully supporting the purpose of EEOICPA -- to administer this compensation program in a truly claimant friendly manner.

Thank you,
Antoinette Bonsignore