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Sent: Monday, October 22, 2001 3:07 PM
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Subject: NOPRM Comments 42 CFR Part 81

Subpart C - Data Required to Estimate Probability of Causation
Section 81.6

In the NOPRM Preamble, FR Page 50970, column B it states "...some employees covered by EEOICPA, were required, as a condition of employment, to undergo routine medical screeining with x rays. The dose resulting from these x rays will be included in their dose reconstruction."

Section 81.6 speaks of including in the dose estimates LET radiation (...low-energy x-ray), but the IREP operating guide and the remainder of the NOPRM are silent about how the medical x-ray dose estimates will be re-constructed or any conservatisms to be employed with medical x-ray data is not retrievable or available.

Comment: The mechanisms for reconstructing medical x-ray doses, both occupational and in some severe objective cases (non-occupational - i.e., IVPs, IMGs, Tomography, etc.) should be considered in the dose calculation, and the mechanism(s) for reconstruction, such as height, weight, equipment used at the time, etc. should be addressed. Also, the x-ray doses only account for successful x-ray films. Unsuccessful films are not part of the occupational file and are not accounted for, but in some cases, can be a significant contribution to the x-ray dose. Please explain how this data will be considered or the mechanisms that will be implemented in the IREP OG or the NOPRM.

Thank you!

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