Miller, Diane M.

From: Laura Atwell [atwell@ncrp.com]
Sent: Friday, October 19, 2001 11:25 AM
To: niocindocket@cdc.gov
Subject: Comments

Comments on "Guidelines for Determining the Probability of Causation."

Charles B. Meinhold, President
National Council on Radiation Protection and Measurement

The Probability of Causation approach to compensating exposed workers is clearly warranted.

Specific Comments:

Sub Part A 81.2: Since the Probability of Causation is being used it would seem that a "PC" of 25 % could justify half of the compensation given for a "PC": of 50 %. This might make sense down to a "PC" of ~5 %. In addition the final sentence in 81.2 suggests that nonradiogenic cancers be included. This seems strange since the risk coefficient would be zero and the PC would be 0 %.

Sub Part C: 81.5: Personal Information required for a proper "PC" analysis may require additional information to establish an appropriate baseline malignancy rate. Excess exposure to ultraviolet, occupation exposure to benzene, asbestos or other
carcinogens, radon exposure at home, etc. could be important contributors to the baseline rate.