-----Original Message-----
From: Starr, Chauncey [mailto:CSTARR@epri.com]
Sent: Monday, November 26, 2001 3:35 PM
To: 'ocas@cdc.gov'
Subject: NIOSH-IREP

The probability of causation model omits an insertion for the exposure threshold level below which no occupational illness will occur. The assumed LNT extrapolation to zero is scientifically without any experimental foundation, and its use in this document enshrines a historical myth that grossly exaggerates the significance of low-level exposures. The policy consequences of this non-scientific position is to massively enlarge the employee groups that can claim compensation, as well as perpetuating the public concern with radiation at any level, no matter how small. I refer you to the findings of the Health Physics Society on this topic.

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