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From:
Sent: Sunday, April 06, 2003 4:42 PM
To: NIOCINDOCKET@CDC.GOV
Subject: Comments on Proposed Rule Change for SEC

My father, worked at Mallinckrodt Chemical Works, Destrahan Plant, during the years 1943-1968. He did his patriotic duty working with nuclear hazards for the Manhattan Project and suffered for years from various environmental diseases and died of bladder cancer because of his exposure to these chemicals and agents. I don't believe NIOSH can dose reconstruct anything from my dad's records for a number of reasons, but these are some major ones below:

1 There is not sufficient dose information on these workers. Some valid workers aren't even on the employee lists that NIOSH is using. 2 Multiple worksite, multiple exposure and multiple job title employees cannot be dose reconstructed with accuracy. My dad worked as a pipefitter and chemical operator in different buildings and sites. 3 Dad was not monitored for many of the elements (alpha and beta particle radiation, silica, thorium, beryllium, etc) he was exposed to, so his records can't possibly be dose-reconstructed for these elements now. 4 Mallinckrodt actually admitted its culpability in 1981. Three Mile Island settlement put aside 3 million dollars for MCW workers studies. The judgement that came down set a precedent that any amount of radiation causes cancer. 5 There is a huge conflict of interest at Oak Ridge Associated Universities (run by DOE), where all the MCW records are stored. 6 There are insufficient health physicists working on these projects. They can't possibly dose reconstruct all these records. 7 Workers at MCW were unknowingly exposed to extremely hazardous agents because Mallinckrodt and the Federal Government didn't want to accept responsibility for their health-related problems. I have heard foremen who are still alive say this and have read documents that show this to be true. 8 Safety officers at MCW's Destrahan plant and at Weldon Springs were not hired until several years after the workers had started working on the Manhattan Project and been unduly exposed to very hazardous substances that they knew little or nothing about. 9 Co-worker data is not valid for this kind of exposure. NIOSH told us they could dose-reconstruct from co-worker data. This is outrageous. 10 All of us in dad's family were also unknowingly exposed to hazardous chemicals because these agents were all over his body, hair and clothes. These chemicals penetrated everything. Even his street clothes locker in the plant was not sealed off and thus exposed to these chemicals. Another whole group of people related to these workers have also been exposed to these nuclear elements. For example, my mother and I have also suffered from cancers and diseases that most probably resulted from our exposures. My dad's type of exposure can result in DNA mutations that will be with us and our progeny.