

Miller, Diane M.

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From: Bill Hayes

Sent: Saturday, August 25, 2006 9:22 PM

To: NIOCINDOCKET@CDC

Cc:

Subject: Special Exposure Cohort (SEC) (42CFR Part 83)

Please accept these comments to be included in the Public Docket for 42 CFR, Part 83, Special Exposure Cohort.

I am asking that strong consideration and approval be given to add the Hanford Fire Department and all of its members as a Special Exposure Cohort.

I believe that Hanford Firefighters hired before 1985 should be added under Section 42 CFR Part 83 as a special Exposure Cohort group; as there cannot possibly be accurate records for these people in regards to their radiation exposures while performing their duties at the Department of Energy's site in Hanford, Washington.

I make this statement, because these firefighters had dosimetry cards that were located behind their security badges in the same holder. These badges with the dosimeter were always under heavy protective clothing when worn and secured in blue coverall pockets. (Front pocket, Breast pocket and/or Rear pocket)

For example, as a firefighter I responded to radiological hazardous facilities and incidents in the 1970's through the early years of the 1980's with my dosimeter located behind my security badge as directed by security and dosimetry. And as stated above, my badge with my dosimeter may have been in my hip pocket, front pocket or breast pocket. It also may have been left in the fire truck due to the coveralls not having any secured pockets to keep it in and still perform my duties as a fire fighter. (No one wanted to lose their security badge that was a definite no, no and could be considered a security infraction.)

Its also a known fact that the 100-N reactor site through the 1980's did not even use the most readily available technology to track and read dosimetry results for its own employees and visitors to the 100-N area facilities and buildings.

We were often asked to wear the 100-N dosimetry equipment, pencils, rings etc.; but I cannot find any record of me doing so.

When not performing emergency response at this facility, I was often found inspecting/testing the fire suppression sprinkler system for the 100-N Inner and Outer rod rooms when the reactor was down for maintenance. Surely you would think that there would be some record of my radiation exposures while I was doing this work. (But I have found none.) But I do remember after doing this work having a specimen container for me to urinate in, delivered to my front door for many weeks and then on a monthly basis for some time. (Why was That?) The firefighters working with me also had these containers delivered to their front doors, too.

I was not the only firefighter to be exposed in these ways and many other ways while employed to keep the site safe for its employees and the off site public.

As firefighters we depended mistakenly on all the contractors to track our radiation doses. Unfortunately not all Hanford contractors used the same techniques and technology to read and record dosimetry results. In the 1970's through the 1980's there were as many as five (5) contractors at Hanford, all with their own Radiation procedures and rules and protocols. At present there are three (3) major contractors.

I'm the Deputy Hanford Fire Department Fire Chief and was diagnosed with Chronic Myelogenous Leukemia in April of 2000. I've been employed at the Hanford Nuclear Reservation since December 1972.

Also, in the year 2000 our Fire Chief was diagnosed with esophageal cancer. He has previously employed in the early 1960's and 1970's at the Rocky Flats Nuclear site. While employed at this site he was involved in one of the nations largest plutonium fires ever at any Department of Energy site or the then known AEC. He was given a commendation for his bravery and dedication for performing above and beyond the call of duty as a firefighter trying to protect the site personnel, the interest of the US Government and his efforts in trying to protect the surrounding public and communities. He also cannot find or obtain records showing any true accurate data of his exposure at Rocky Flats or Hanford. But as NIOSH knows, autopsies of people who were exposed in these fires have shown higher levels of plutonium in their bodies than previously known. This was confirmed by the NIOSH representatives at the public meeting held in Richland, Washington on August 7, 2002.

The emergency services organizations and its people are usually the last to know when something wrong has happened at these sites and are the people who dedicate themselves to protecting the government's interest, property and the public on a 24 hour a day basis 7 days a week.

So please make sure that all these emergency services workers who have filed claims and may file later receive special attention as they have been and still are providing the best loyal service they can to the United States Government and to the surrounding communities and public.

Deputy Fire Chief
William R. Hayes