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ACRONYMS AND ABBREVIATIONS

ABRWH  Advisory Board on Radiation and Worker Health
or Advisory Board

AEC    Atomic Energy Commission

CDC    Centers for Disease Control and Prevention

CFA    Central Facility Area

CFR    Code of Federal Regulations

CPP    Chemical Processing Plant

DCAS   Division of Compensation Analysis and Support (formerly Office of
        Compensation Analysis and Support (OCAS))

DFO    Designated Federal Officer

INL    Idaho National Laboratory

MTR    Material Test Reactor

NIOSH  National Institute for Occupational Safety and Health

NOCTS  NIOSH OCAS Claims Tracking System


SEC    special exposure cohort

TLD    thermoluminescent dosimeter

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EXECUTIVE SUMMARY

The National Institute for Occupational Safety and Health (NIOSH) released the Special Exposure Cohort (SEC) Petition Evaluation Report for SEC-000219 for the Idaho National Laboratory (INL) on March 12, 2015. On March 25, 2015, NIOSH/Division of Compensation Analysis and Support (DCAS) presented the Petition Evaluation Report at the 104th meeting of the Advisory Board on Radiation and Worker Health, which took place in Richland, Washington. NIOSH recommended the following class definition of workers for inclusion to the SEC class:

All employees of the Department of Energy, its predecessor agencies, and their contractors and subcontractors who worked at Idaho National Laboratory in Scoville, Idaho, and were monitored for external radiation at the Idaho Chemical Processing Plant (CPP) (e.g., at least one film badge or TLD dosimeter from CPP) between January 1, 1963 and December 31, 1974 for a number of work days aggregating at least 250 work days, occurring either solely under this employment, or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

(NIOSH 2015a)

At that time, the Advisory Board expressed concern as to the high level of confidence that is required to assure that class definition would not inadvertently exclude claimants who may have been exposed at the Chemical Processing Plant (CPP), but for whom dosimetry records are not available (see ABRWH 2015, pp. 187–210). SC&A was then tasked by the Advisory Board to investigate available dosimetry records in order to assess the validity of the class definition, as proposed by NIOSH. SC&A released their review of the class definition on June 29 (SC&A 2015) and presented their findings to the Work Group on July 8, 2015. At that meeting, NIOSH revised their proposed class definition as follows:

All employees of the Department of Energy, its predecessor agencies, and their contractors and subcontractors who worked at the Idaho National Laboratory (INL) in Scoville, Idaho, and were monitored for external radiation at the Idaho Chemical Processing Plant (CPP) (e.g., at least one film badge or TLD dosimeter from CPP) between January 1, 1963 and February 28, 1970 or who were monitored for external radiation at INL (e.g., at least one film badge or TLD dosimeter) between March 1, 1970 and December 31, 1974 for a number of work days aggregating at least 250 work days, occurring either solely under this employment, or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

(NIOSH 2015b)

Additionally, NIOSH presented new information recently obtained from the Department of Energy (DOE) regarding dosimetry records at the CPP, which had recently been discovered. These records represent a significant increase in the available monitoring data for CPP workers and affected revisions in the Finding 2 from Rev. 0; however, at the July 8, 2015, INL Work Group meeting, NIOSH indicated that it does not expect to receive the full data set for several weeks. Thus, this report is an interim update to Rev. 0, which was delivered to the Work Group.
on June 29, 2015, and is prepared principally to inform the Advisory Board at the July 23, 2015, meeting in Idaho Falls, Idaho. It presents an update to SC&A’s original evaluation (SC&A 2015) of the available records in the context of the requirements of the SEC class definition. After the new data are available and SC&A has reviewed them, we will prepare a final revision (Rev. 2) to this report.

Based on our original review and our assessment of the new data that NIOSH presented at the July 8, 2015, Work Group meeting, SC&A has the following two findings and one observation.

**Finding 1:** The dosimetry records contained in the NIOSH/OCAS Claims Tracking System (NOCTS) are not sufficient to accurately determine if a given claimant worked at the CPP (and thus qualifies for the SEC) for at least some workers, due to the absence of external dosimetry records designating the area worked.

**Finding 2:** Based on the evaluation of available claimant records, a portion of the supplementary dosimetry records, and claimant-specific dosimetry recently provided by DOE, SC&A was able to find “at least one” dosimetry badge for all claimants reviewed who had direct evidence of work at the CPP. However, SC&A is not able to evaluate the completeness of the full set of supplemental records until such a time as all CPP-related external monitoring (January 1, 1963–February 28, 1970) and INL external monitoring (March 1, 1970–December 31, 1974) is provided to NIOSH and the Board.

**Observation 1:** SC&A did not find any evidence that work locations provided in available area dosimetry cycle reports were contradicted by other work location-specific information contained in the claimant records. In nearly every instance, the areas specified in the dosimetry records comported perfectly with alternate information. The only exceptions were for two sampled claimants who submitted bioassay results that indicated “CFA,” while the dosimeter results indicated “MTR” (see Appendix C: C.6 and C.11).

**SC&A Recommendation:** It is SC&A’s opinion that the probability of a claimant being excluded from the SEC class based on absence of dosimetry records when, in fact, they worked in CPP is low. This is particularly true for Atomic Energy Commission (AEC) and prime contractor employees. However, the complete set of dosimetry records for subcontract and/or construction trades workers has not yet been received from INL. An evaluation of the completeness of these supplemental dosimetry records would appear to be warranted when they become available.

SC&A believes that it would be instructive to conduct focused interviews with intermittent or transient subcontractors and trades workers to help determine if the policy of badging individuals entering relevant areas was universal for all workers and periods. Additionally, it would be pertinent to ascertain what subcontractors supported radiological work activities at CPP (company identity and rosters) as a basis for whatever class definition is defined for the SEC.

Finally, it will be important to validate the DOE records search process through appropriate focused searches of CPP workers who appear to be lacking primary and supplemental records in
the current dataset. This will help assure that all relevant claimants are correctly identified should the full set of dosimetry records be deemed complete.

The Executive Summary for this report has been reviewed for compliance with the Privacy Act of 1974 (42 U.S.C. § 7348n(3)(A)) and has been cleared for distribution. However, the body of this report is predominantly information protected by the Privacy Act, and therefore not readily available for proactive release. Individuals may obtain this document by submitting a document request to the Designated Federal Official for the Advisory Board on Radiation and Worker Health:

Theodore Katz, Designated Federal Officer, NIOSH, CDC, 1600 Clifton Road, N.E., MS E-20, Atlanta, Georgia 30333, telephone: (513)533-6800, toll free: 1-800-CDC-INFO, e-mail: dcas@cdc.gov.