

Overview of
PERFORMING AND REPORTING DOSE RECONSTRUCTION
(OCAS-PR-003, Rev. 0)

This procedure, *Performing and Reporting Dose Reconstruction* (OCAS-PR-003), deals with the administrative process for dose reconstruction for claimants. In addition, it establishes that uncertainties concerning data quality or dose be handled in a claimant-favorable manner, and sets thresholds for when a sufficient level of analysis is achieved and when additional effort is warranted. The National Institute for Occupational Safety and Health (NIOSH) staff and its technical support contractors use this procedure in the performance, review, and documentation of dose reconstructions for covered employees with cancer.

The procedure lays out the steps required in collecting information, provides guidance for the calculation methods, and discusses what information is relevant for the preparation of dose reconstruction reports. The procedure also addresses notification protocol in the event the dose reconstruction cannot be completed with the information in hand, and lists the letters and record management requirements for each case.

SUMMARY OF FINDINGS RESULTING FROM THE TECHNICAL REVIEW

Review of this procedure by the technical contractor for the Advisory Board on Radiation and Worker Health (the Board) produced the 11 findings summarized below:

Finding #1: The document is ambiguous in identifying individuals who are responsible for various steps of the dose reconstruction process.

Finding #2: Some of the subsections could be organized in a more logical, clear manner.

Finding #3: Reference should be made to all relevant procedures and documents that are directly applicable to the dose reconstruction process.

Finding #4: The procedure contains a few inconsistencies and lacks the level of detailed guidance provided in some other procedures.

Finding #5: The guidance is limited regarding conducting dose assessments for potential low or high Probabilities of Causation (POCs).

Finding #6: The guidance given for claimant interviews is very brief.

Finding #7: The guidance given for “best estimate” dose reconstructions is inadequate.

Finding #8: The procedure does not discuss prioritizing data used in dose reconstruction in a hierarchical manner, as prescribed in regulations.

Finding #9: The procedure does not draw a strong distinction between instances where worst-

case assumptions are selected for process efficiency as opposed to being selected because of unknowns.

Finding #10: The procedure provides no guidance regarding dose estimate uncertainty.

Finding #11: An extensive list of potential sources of data is provided, but restrictions on the use of the data sources minimizes their value.

RESOLUTION OF FINDINGS

In response to the findings identified above, NIOSH did three things:

- (1) Agreed with all findings
- (2) Developed more specific procedural guidance in the period since this procedure was prepared
- (3) Cancelled this procedure

The Board recognized that the document has been replaced with more specific procedural guidance elsewhere and, accordingly, closed all issues associated with it.