

Comments to the Board

Thank you for allowing me to comment on the Board's evaluation of Petition SEC 00192. On October 17th 2013 the Board extended the investigation for SEC 00-192 from 1983 until 2005.

Note: this fact seems to have changed over time with no explanation.

During the July 14, 2015 WG meeting the Senior Scientist of the CML joined the discussion and expressed strong disagreement with the conclusions of the NIOSH White Paper and requested a personal interview that was conducted and recorded on October 13th 2015. *See Attached recording*

The WG met on October 28th 2015 *See review summary of investigations outstanding.*

November 19th 2015 the WG presentation for the Full Board was written without resolution of the outstanding issues noted in the October 28th WG meeting.

November 30th I commented with documentation on issues related to the inability of NIOSH to reconstruct Dose. I requested that Ted Katz add the material to the Docket and asked for a response to the issues presented. No response was forthcoming.

January 2017 the reassessment CML paper was written and too many unsupported assumptions were made at the direct contradiction of the Site Expert with hands on documented knowledge of the CML. The February 9th 2017 meeting published no transcript for review by stakeholders and a vote was taken by the WG not to recommend the SEC expansion.

A thorough investigation of the CML was not performed

- Kotelchuck: will be giving a presentation at the November meeting
- Munn: agrees that a thorough review is necessary and looks forward to the report in light of the information received. It was only at the last meeting that Kotelchuck was aware of the Lead Scientist and his concerns. Important issues have been raised. We have 35 boxes to consider and it will take time.
- Ted Katz gave a hard deadline on the report and wants it by the 12th
- LR will provide background on the issues for use in the presentation.

Investigations agreed to and not followed up on. See Transcript of the Oct 28, 2015 WG meeting after the interview with the Lead Scientist. The WG was not invited only Dr. Kotelchuck was on the line.

LR: Gave a briefing without a transcript while waiting for a response from the Lead Scientist that what was noted by NIOSH was accurate. The interview motivated us to further investigate. Lead Scientist indicated that he sent 35 boxes to LANL

We will

- LR: Search for more documentation on power levels
- LR: Retrieve workers personal bioassay, lung counts, for potential exposures in the CML
- LR: Research the Site that the HEU had been shipped to for activity concentrations.
- LR: Identify product levels generated by other criticality experiments performed throughout the complex
- An interview was conducted with a post 83 RCT the week before. "Our assumption was always that there was little potential for airborne internal exposures to contaminants based on

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operations and routine monitoring". The RCT had issues with this assumption. We have some air monitoring data from the facility but are looking to validate or refute the RCTs testimony.

- We will be interviewing technicians and RCTs that worked during that era
- LR: I will report back after next week's visit on the research of the 35 boxes and obviously SC and A and the WG will want to attend during the review of the boxes.
- We will be looking for the Log book recordings of the measurement strips
- *Chairman Kotelchuck asked if we have the Badges* LV: responded that they would look for personal documentation to verify monitoring
- *Chairman Kotelchuck:* expressed relief that there was a transcript of the lead Scientists interview and that the WG would be able to review them.
- *Chairman Kotelchuck* stated that the criticality occurrences would make it difficult to assess neutron exposures.
- LR agreed that the transcript and review would take a few months
- *Phil Schofield:* How were the Sources stored and packaged? What were their age? To help determine chance of leakage.
- LR: We have a good history of when material was brought in and what was stored in the facility up until 1989.
- LR agreed to report back to WG the building associated with room 125 cabinet that held multiple sources including Cobalt 60. NIOSH does not know the size of the source.
- Cannot perform fixed contamination surveys on the 600 curie source because the background is too high. Can only do smear tests for loose contamination. The smears taken 20 and 45 dpm per 100 were Alpha and not Beta/Gamma, they were room surveys. **Look for Alpha symbol at the top of the survey**
- LR: 600 Curie Source in the Grammacell PS asked about encapsulation etc. LR has drawings of it and the irradiator that it was enclosed in. PS responds that it answers his question. ? **No**
- *Chairman Kotelchuck* presumes that there is documentation of leak checks .LR: "We will see if we can generate some of those"
- Is there an historical record of all leak testing?
- CK asks LR if the summary of the interview with the Lead Scientist will be made a public record. LR answered No it will be kept on file.