

**Division of Compensation Analysis and  
Support  
Program Evaluation Report**

Document Number: DCAS-PER-079

Effective Date: 10/27/2020

**Pinellas Plant TBD Revision**

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RECORD OF ISSUE/REVISIONS

ISSUE AUTHORIZATION DATE	EFFECTIVE DATE	DESCRIPTION
10/20/2020	10/27/2020	New document to determine the effect of issuing revisions to ORAUT-TKBS-0029 (Pinellas Plant TBD) on previously completed claims. Incorporate NIOSH comments.

**1.0 Description**

ORAUT-TKBS-0029, the Pinellas Plant Site Profile consists of six Technical Basis Documents (TBD) pertaining to different parts of reconstructing radiation dose at the plant. Previous revisions to these parts were reviewed under PER-0028. Since that time, several reviews have been conducted resulting in revisions to ORAUT-TKBS-0029-6, Pinellas Plant Occupational External Dose. The last approved revision was issued on 12/11/2017. The effect of issuing revisions to the TBD on previously completed claims is the subject of this PER.

**2.0 Issue Evaluation**

Revisions to the Pinellas Plant TBD include:

- Eliminating the assignment of onsite ambient external dose and replacing it with the more favorable unmonitored dose.
- Monitored and unmonitored tritium doses increased for all years.

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These changes mean all previously completed claims are affected and none can be eliminated from further evaluation based on the changes. Additional changes did occur, but it is unnecessary to itemize them here since all claims must be evaluated.

### **3.0 Plan for Resolving Corrective Action**

A search of the NIOSH OCAS Claims Tracking System (NOCTS) database plus a text search of dose reconstruction reports created an initial population of 529 claims. Of these, 16 had been pulled by the Department of Labor (DOL) from dose reconstruction for various reasons including being compensable under a Special Exposure Cohort (SEC) class. An additional 7 claims were active at NIOSH after being returned for various reasons. Those would get a new dose reconstruction based on the revised TBD so evaluation under this PER is not necessary.

Seventy-six claims were eliminated because the previous probability of causation (POC) was greater than 50%. Four claims met the criteria for compensation under an SEC (for a site other than Pinellas) and no longer needed a dose reconstruction while 39 claims had no Pinellas employment or visits. The dose reconstruction report for those had mentioned the Pinellas plant for other reasons.

Finally, 3 claims were eliminated from further evaluation because they had been completed after the TBD was revised. This results in 384 claims requiring further evaluation under this PER. Prior to this evaluation, 4 additional claims were returned to NIOSH for a revised dose reconstruction. Those 4 will be revised based on the revised TBD and so they were removed from further evaluation under this PER.

Doses for these 380 remaining claims were recalculated using the site profile as well as all other applicable procedures. The POC for 379 claims resulted in a new POC below 45%. The POC fell between 45% and 50% for 1 claim. For that claim, IREP was run 30 times with 10,000 iterations for each run in accordance with NIOSH procedures. As a result, the claim remained below 50%. No claims resulted in a POC greater than 50%. NIOSH will provide the Department of Labor with the list of all the claims evaluated under this PER.