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Sent: Monday, May 24, 2010 10:08 AM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 194 - Ten-Year Review of the NIOSH Radiation Dose Reconstruction Program Comments

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Comments
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Re: Docket Number NIOSH-194

To Whom It May Concern:

The Linde Ceramics SEC Action Group is grateful for the opportunity to provide the following comments to the National Institute for Occupational Safety and Health (NIOSH) for its ten year EEOICPA review.

Comment #1: Establishing Definitive Criteria for the Appropriate Application of Co-Worker Data:

The Linde Ceramics SEC Action Group is currently involved in the evaluation of its SEC petition covering the residual radiation period at the Linde Ceramics facility. There has been an ongoing concern about the ability for DCAS to apply a co-worker data model to bound worker exposures during the residual radiation period at the Linde facility from 1954 through 2006. Although, the Advisory Board has now issued revised criteria for the appropriate application of "other site" surrogate data for the dose reconstruction program and for Special Exposure Cohort (SEC) evaluations, there remains no corresponding criteria for the appropriate application of co-worker data models. Moreover, OCAS-IG-004 deals only with "other site" data applications.

It is imperative that both DCAS and the Advisory Board scrutinize the appropriate application parameters for the use of co-worker data models to mirror the scrutiny applied to "other site" surrogate data applications.

The Board's analysis and review of the use of "other site" surrogate data criteria has provided increased transparency into the dose reconstruction and SEC evaluation applications regarding the use of such data. However, the lack of definitive application criteria for co-worker data models leaves some SEC petitioners without a reference guide from which to evaluate SECs based on co-worker data applications. The criteria delineated recently by the Board regarding the appropriate use of "other site" data should similarly be applied for co-worker data applications, including an analysis of the following differences between the co-worker data model and worker exposures during the proposed SEC time period:

1. Similarity of production procedures.
 2. The presence or absence of conditions that might affect exposure.
 3. Differences in monitoring methods between the end points of proposed co-worker data model.
 4. Does the co-worker data model reflect the type of operations and work practices in use during the proposed SEC time period?
 5. Has appropriate consideration been given to temporal differences, working conditions, and processes varied between the co-worker model and the proposed SEC time period?
- Plausibility criteria: reasonableness of assumptions addressing the following:
 - a) Scientific plausibility - has the co-worker data model data been validated using actual monitoring data collected in a similar situation?
 - b) Workplace plausibility - are the assumed processes and procedures (including monitoring) plausible for the proposed SEC time period in question? Have all the factors that could significantly impact exposure been taken into account?

In conclusion, the Linde Ceramics SEC Action Group very much appreciates the opportunity to address this matter with NIOSH and we ask that the foregoing issue be addressed specifically within the ten year EEOICPA review. Additionally, we request that a Working Group be established to examine this issue without delay.

Sincerely,
Antoinette Bonsignore
Linde Ceramics SEC Action Group