

Dragon, Karen E. (CDC/NIOSH/EID)

From:
Sent: Thursday, June 14, 2012 8:21 AM
To: NIOSH Docket Office (CDC)
Subject: attached letter from chief petitioner for June 20th meeting
Attachments: Advisory Board Letter.docx

I would like to post a copy of this letter to NIOSH Docket 140 as chief petitioner.

Thank you,

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June 12, 2012

To The Advisory Board on Radiation and Worker Health.

First of all, I would like to thank the Advisory Board for their time, patience, and consideration. After several years of research and hard work by [redacted] the TBD Work Group and many others that have devoted their time and expertise to the GSI claimants and to my SEC-00105 petition, it appears that the time has come for ABRWH to make a recommendation to the DHHS for final recommendation on the SEC. I am disappointed that all Appendix BB issues are not resolved as the vote approaches.

It is quite clear that the BOARD lacks sufficient dose reconstruction information to bound internal and external radiation doses at General Steel Industries with sufficient accuracy.

A recent recommendation to deny the SEC for part of the covered period of 1953 to 1957 by Wanda Munn and Paul Zierner based on a letter submitted by GSI [redacted] is simply unreliable. There isn't any proof of film badge data that confirms his letter. New data recently submitted by [redacted] clearly supports that.

Film badging was not available in those early years and after all this debate over the last several years, that is one thing that cannot be disputed according to evidence presented and recorded. No monitoring data of any kind was available for 97% of the SEC class at GSI for the entire period 1953-1992.

Dose reconstruction is a theory and it appears to be a very bad one. Direct measurements of uranium, Betatron, and cobalt-60 radiation effects by means of film badging for all 3000 exposed workers, urine bioassays for uranium, and air and dust samplings throughout the entire covered and residual periods would be required to make accurate dose reconstruction for all GSI workers in the SEC class. Otherwise it is a guessing game...at the expense of the GSI employees' health. This was a death sentence to many of these people.

It isn't the worker's fault that the badges weren't available or even in existence. I do not believe that they should suffer more than they already have due to the dangerous conditions that they were unknowingly exposed to.

I have only seen documentation of one case of film badge recording at GSI from 1953-1963. From 1964-1966, 89 were recorded, and a mere 19 cases from 1967-1973. It alarms me to think that any GSI claimants could lose their claim based on these small numbers.

Records show that radiographers are the only recorded class of GSI worker that wore badges that is documented.

My main concern is for the surviving GSI employee claimants. These people are experiencing little quality of life, enormous amount of pain, and mounting medical bills. Had they been given adequate training or some kind of disclosure to sign that warned them of the dangers of overexposure to radiation, I don't believe that any one of them would have reported back to work the following day. Unfortunately for the GSI employees', disclosures and adequate training were not offered.

Once again, I would like to thank all of the professional experts, groups, and individuals involved that have devoted their time to this SEC Petition I appreciate your devotedness to promote fairness to all of the affected GSI employee claimants.

In closing I would like to ask that you take all recent documentation submitted by the TBD Work Group into consideration before you make your recommendation to the DHHS.

Sincerely,

SEC-105 Petitioner