

*Alliance of Nuclear Worker Advocacy Groups*

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To: NIOSH Docket Office

Fax: 513-533-8285

From: Terrie Barrie

Date Sent: April 29, 2010

Number of Pages: 3

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Message:

Docket Number NIOSH 194

Please accept the following comments for Docket Number NIOSH 194.

Sincerely,



Terrie Barrie  
ANWAG  
175 Lewis Lane  
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**ALLIANCE OF NUCLEAR WORKER ADVOCACY GROUPS**

April 29, 2010

NIOSH Docket Office  
Mailstop C-34  
Robert A. Taft Lab  
4676 Columbia Parkway  
Cincinnati, OH 45226

Re: Docket Number NIOSH-194.

To Whom It May Concern:

The Alliance of Nuclear Worker Advocacy Groups (ANWAG) wishes to offer an addendum to our comments of March 9, 2010 to the National Institute for Occupational Safety and Health's (NIOSH) Ten-year review of the dose reconstruction/special exposure cohort program required under the Energy Employees Occupational Illness Compensation Program Act of 2000, as amended (EEOICPA) administered by the Division of Compensation Analysis and Support (DCAS).

Some ANWAG advocates recently attended the NIOSH two-day workshop in Cincinnati which explained the dose reconstruction and SEC programs. The workshop was very helpful and informative.

However, information was relayed to the group that has a direct bearing on the Ten-year review and is of concern to the advocates. This information provided by NIOSH during the Workshop deals with the quality of science practiced within the program as well as the appropriateness and the consistency of individual dose reconstruction determinations.

Two separate NIOSH representatives gave conflicting accounts as to whether worker oral histories, offered during the CATI interviews, are given any consideration when reconstructing dose. The presenter in the morning session stated, "No." However, the afternoon presenter stated that NIOSH does indeed consider workers' accounts of their work experience and will sometimes attempt to verify these histories by researching Department of Energy documents.

Consequently, ANWAG questions whether NIOSH accepts and subsequently investigates work histories provided by workers/claimants during CATI interviews or whether such accounts are ignored when reconstructing dose? Moreover, is it possible that one dose reconstruction team considers these histories while other teams consider them suspect? What criteria have been established by NIOSH to determine and/or assess the credibility of workers' statements during CATI interviews? Have the dose reconstruction teams developed any site specific metric to evaluate workers' statements to initiate subsequent data capture efforts to verify workers' statements?

**ANWAG is appreciative of this opportunity to offer comments on the Ten-year Review of NIOSH's responsibility under EEOICPA. We trust that our concerns will be fully addressed. If you require further information or clarification of any of the issues we raised, please do not hesitate to contact us.**

**Sincerely,**



**Terrie Barrie**

**For ANWAG members**

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