

Miller, Diane M.

From: RickuDana@aol.com
Sent: Tuesday, May 31, 2005 7:13 PM
To: NIOSH Docket Office
Subject: Comment on Chapman Valve

These comments have been submitted, but do not appear on the list of comments on Chapman Valve.

Stu--

Based on what I heard yesterday at the joint DOL/NIOSH meeting in Holyoke, MA on April 19, 2005, the comments submitted on the Chapman Valve draft site profile arrived after NIOSH finalized its site profile. As a consequence, it appears that there was no comment resolution. Western Mass COSH had set up the Chapman worker meeting to get early input to NIOSH (and avoid some of the issues that arose at Bethlehem), but this appears to be a wasted effort. We are beginning to question the wisdom of this early input approach with NIOSH, if this is simply a ceremonial process.

Here is restatement of the basic comments submitted on 3/1/05 after the Chapman Valve Meeting on 2/14/05 held at Western Mass COSH offices in Springfield, MA. I understand there are still 35 of 91 cases in the queue at NIOSH to be dose reconstructed. I presume the lung cancers are being paid, and the rest are other organs. Could you kindly have someone review these comments and resolve this issues raised before finalizing the 35 cases in process?

Key points raised on 2/14/05 were --

- 1) NIOSH reports fire in June 1948, but NIOSH does not know the date of the uranium fire in 1948, ORAU staff concedes they do not know the date. Effort made to go to the files in the Springfield Fire Dept. The lab results letter suggests two of the in plant workers fought fire and that this was the reason that SFD had no reports on this fire. What is the bounding estimate for the date of the fire?
- 2) Questioned 2.16% enriched uranium found by ORNL in Chapman site survey for cleanup. Site profile says only natural uranium (0.7% U 235) was used at Chapman. ORAU's Cindy Bloom said she would look into it. It was found near the uranium chip incinerator/burner. This may indicate that other activities took place at Chapman Valve involving enriched uranium and were incinerating these in the chip burner as well. Workers keep mentioning there were other uranium activities, but we have no contracts to indicate as such. Mark Rolfes informally suggested yesterday that this was an anomolous result and should not be credited as part of any dose reconstruction. That is not not an adequate response, in my view, and absent a review of the sampling data. After all it was DOE's contractor that found the enriched uranium in recent years!
- 3) NIOSH was unaware of a uranium chip incinerator for burning uranium debris in Building 23. It was not mentioned in the production process information in the site profile. It is on the ORNL environmental characterization maps and a report exists from the environmental site characterization describing this unit. Map provided to Cindy Bloom. What are the dose consequences to workers from dust from the inceinerator.
- 4) Richard Miller provided air data from NUMEC from a NUMEC incinerator in PA. Was this used as a basis for estimating dose?
- 5) The site profile is in error saying all uranium chips were sent off site for disposal. They were burned on site. This error is based on inaccurate statements from the Ed Dvorchak affidavit given to Crane lawyers.
- 6) There is disagreement whether the interal dose monitoring data is sufficiently representative. ORAU asserted that there is enough data to reconstruct dose, based on 22 samples taken in July 1948, and 7 taken thereafter in September and October 1948. This data seems far too scant to draw broad conclusions, and it was not done on the days of highest production, so it is inadequate for making any maximizing assumptions.

6/1/2005

7) Question was asked about how worker urine data or limited air samples at Chapman compares with similar uranium lathe turning operations. Uranium fires are common in lathe operations. Answer, ORAU would have to look at Y-12 co-worker data. Was this done? There was limited resources for this kind of research, stated ORAU. But there is no air data/urine from which to do verification, given comparable uranium machine shops with comparable ventilation. Lack of internal exposure verification is a continuing weakness in NIOSH site profiles.

8) There was a suggestion that more data may exist at Brookhaven, but nothing concrete or firm was offered. Was added research conducted?

9) Question asked about the purpose of the "cracking furnace." It had a high stack readings for uranium through the roof. Purposes of cracking furnace unknown to site profile authors. Overall, the description of the operations were quite limited. This means we have no dose information on the cracking furnace, except on the roof. Has NIOSH addressed this?

10) Provided an AEC memo on uranium "rolling" work at Chapman. Do not know if rolling took place. NIOSH. Has NIOSH addressed this?

11) There is only 1 day of uranium air samples, thus too limited data to verify urine results. Data taken on 5/24/48. Data showed elevated levels of uranium in lunch room, and other non production area, raising questions about overall levels of uranium dust/smoke in facility/type of ventilation system. How credible are NIOSH's maximizing assumptions and is the data too scant to make bounding estimates?

12) Raised concern that smoke from lathe fires would involve smaller particle size than the 5 micron default assumption. Thus, 5 micron AMAD needs to be re-examined.

Richard D. Miller