Special Exposure Cohort Petition
under the Energy Employees Occupational Illness Compensation Act

U.S. Department of Health and Human Services
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health

OMB Number: 0920-0639 Expires: 05/31/2007

Special Exposure Cohort Petition — Form B

Use of this form and disclosure of Social Security Number are voluntary. Failure to use this form or disclose this number will not result in the denial of any financial benefit or privilege to which you may be entitled.

General Instructions on Completing this Form *(complete instructions are available in a separate packet)*:

Except for signatures, please **PRINT** all information clearly and neatly on the form.

Please read each of Parts A — G in this form and complete the parts appropriate to you. If there is more than one petitioner, then each petitioner should complete those sections of parts A – C of the form that apply to them. Additional copies of the first two pages of this form are provided at the end of the form for this purpose. A maximum of three petitioners is allowed.

If you need more space to provide additional information, use the continuation page provided at the end of the form and attach the completed continuation page(s) to Form B.

If you have questions about the use of this form, please call the following NIOSH toll-free phone number and request to speak to someone in the Office of Compensation Analysis and Support about an SEC petition: **1-800-356-4674.**

If you are:			
	☐ A Labor Organization,	Start at D	on Page 3
	☒ An Energy Employee (current or former),	Start at C	on Page 2
	☐ A Survivor (of a former Energy Employee),	Start at B	on Page 2
	☒ A Representative (of a current or former Energy Employee),	Start at A	on Page 1

A Representative Information — Complete Section A if you are authorized by an Employee or Survivor(s) to petition on behalf of a class.

A.1 **Are you a contact person for an organization?** ☒ Yes (Go to A.2) ☐ No (Go to A.3)

A.2 **Organization Information:**

BURLINGTON ATOMIC ENERGY COMMISSION PLANT FORMER WORKERS PROGRAM
Name of Organization

Position of Contact Person

A.3 **Name of Petition Representative:**

Mr./Mrs./Ms. First Name Middle Initial Last Name

A.4 **Address:**

Street Apt # P.O. Box

City State Zip Code

A.5 **Telephone Number:** ( )

A.6 **Email Address:**

A.7 ☐ Check the box at left to indicate you have attached to the back of this form written authorization to petition by the survivor(s) or employee(s) indicated in Parts B or C of this form. An authorization form for this purpose is provided.

If you are representing a Survivor, go to Part B; if you are representing an Employee, go to Part C.

B Survivor Information — Complete Section B if you are a Survivor or representing a Survivor.

B.1 **Name of Survivor:**

Mr./Mrs./Ms. First Name | Middle Initial | Last Name

B.2 **Social Security Number of Survivor:** _____

B.3 **Address of Survivor:**

Street | Apt # | P.O. Box

City | State | Zip Code

B.4 **Telephone Number of Survivor:** (___) ___-____

B.5 **Email Address of Survivor:** _____

B.6 **Relationship to Employee:** ☐ Spouse ☐ Son/Daughter ☐ Parent ☐ Grandparent ☐ Grandchild

Go to Part C

C Employee Information — Complete Section C UNLESS you are a labor organization.

C.1 **Name of Employee:**

Mr./Mrs./Ms. First Name | Middle Initial | Last Name

C.2 **Former Name of Employee** (e.g., maiden name/legal name change/other):

Mr./Mrs./Ms. First Name | Middle Initial | Last Name

C.3 **Social Security Number of Employee:** _____

C.4 **Address of Employee** (if living):

Street | Apt # | P.O. Box

City | State | Zip Code

C.5 **Telephone Number of Employee:** _____

C.6 **Email Address of Employee:** _____

C.7 **Employment Information Related to Petition:**

C.7a Employee Number (if known): _____

C.7b Dates of Employment: Start _____ End _____

C.7c Employer Name: MASON & HANGER - SILAS MASON COMPANY

C.7d Work Site Location: MIDDLETOWN, IOWA
IOP aka IAAP aka BAECP

C.7e Supervisor's Name: [redacted]

Go to Part E

D Labor Organization Information — Complete Section D ONLY if you are a labor organization.

D.1 Labor Organization Information:

_____
Name of Organization

_____
Position of Contact Person

D.2 Name of Petition Representative:

_____

D.3 Address of Petition Representative:

_____
Street Apt # P.O. Box

_____
City State Zip Code

D.4 Telephone Number of Petition Representative: (____) - _____

D.5 Email Address of Petition Representative: _____

D.6 Period during which labor organization represented employees covered by this petition (please attach documentation): Start _____ End _____

D.7 Identity of other labor organizations that may represent or have represented this class of employees (if known):

_____

Go to Part E

E Proposed Definition of Employee Class Covered by Petition — Complete Section E.

E.1 **Name of DOE or AWE Facility:** Burlington Atomic Commission PLant aka Iowa Ordbabce Plant/ aka IAAP aka The Iowa

E.2 **Locations at the Facility relevant to this petition:**
~~IAAP areas include: Line One, Storage Yards C, G, L.~~
Firing Sites, Burning Field "B", Storage areas for pits.

E.3 **List job titles and/or job duties of employees included in the class. In addition, you can list by name any individuals other than petitioners identified on this form who you believe should be included in this class:**
An ALL

E.4 **Employment Dates relevant to this petition:**

Start _____ End _____

Start _____ End _____

Start _____ End _____

E.5 **Is the petition based on one or more unmonitored, unrecorded, or inadequately monitored or recorded exposure incidents?:** ☐ Yes ☒ No

If yes, provide the date(s) of the incident(s) and a complete description (attach additional pages as necessary):

Go to Part F

F Basis for Proposing that Records and Information are Inadequate for Individual Dose — Complete Section F.

Complete at least one of the following entries in this section by checking the appropriate box and providing the required information related to the selection. You are not required to complete more than one entry.

F.1 ☒ I/We have attached either documents or statements provided by affidavit that indicate that radiation exposures and radiation doses potentially incurred by members of the proposed class, that relate to this petition, were not monitored, either through personal monitoring or through area monitoring.

(Attach documents and/or affidavits to the back of the petition form.)

Describe as completely as possible, to the extent it might be unclear, how the attached documentation and/or affidavit(s) indicate that potential radiation exposures were not monitored.

SEE ATTACHED EIGHT PAGES

F.2 ☒ I/ We have attached either documents or statements provided by affidavit that indicate that radiation monitoring records for members of the proposed class have been lost, falsified, or destroyed; or that there is no information regarding monitoring, source, source term, or process from the site where the employees worked.

(Attach documents and/or affidavits to the back of the petition form.)

Describe as completely as possible, to the extent it might be unclear, how the attached documentation and/or affidavit(s) indicate that radiation monitoring records for members of the proposed class have been lost, altered illegally, or destroyed.

THIS TOPIC IS COVERED IN THE EIGHT PAGES ATTACHED TO THIS FORM.

Part F is continued on the following page.

F.3 ☐ I/We have attached a report from a health physicist or other individual with expertise in radiation dose reconstruction documenting the limitations of existing DOE or AWE records on radiation exposures at the facility, as relevant to the petition. The report specifies the basis for believing these documented limitations might prevent the completion of dose reconstructions for members of the class under 42 CFR Part 82 and related NIOSH technical implementation guidelines.

(Attach report to the back of the petition form.)

F.4 ☐ I/We have attached a scientific or technical report, issued by a government agency of the Executive Branch of Government or the General Accounting Office, the Nuclear Regulatory Commission, or the Defense Nuclear Facilities Safety Board, or published in a peer-reviewed journal, that identifies dosimetry and related information that are unavailable (due to either a lack of monitoring or the destruction or loss of records) for estimating the radiation doses of employees covered by the petition.

(Attach report to the back of the petition form.)

Go to Part G

G Signature of Person(s) Submitting this Petition — Complete Section G.

All Petitioners should sign and date the petition. A maximum of three persons may sign the petition.

Signature	Date
	8-28-04

Notice: Any person who knowingly makes any false statement, misrepresentation, concealment of fact or any other act of fraud to obtain compensation as provided under EEOICPA or who knowingly accepts compensation to which that person is not entitled is subject to civil or administrative remedies as well as felony criminal prosecution and may, under appropriate criminal provisions, be punished by a fine or imprisonment or both. I affirm that the information provided on this form is accurate and true.

Send this form to:

SEC Petition
Office of Compensation Analysis and Support
NIOSH
4676 Columbia Parkway, MS-C-47
Cincinnati, OH 45226

If there are additional petitioners, they must complete the Appendix Forms for additional petitioners. The Appendix forms are located at the end of this document.

Public Burden Statement

Public reporting burden for this collection of information is estimated to average 300 minutes per response, including time for reviewing instructions, gathering the information needed, and completing the form. If you have any comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, send them to CDC Reports Clearance Officer, 1600 Clifton Road, MS-E-11, Atlanta GA, 30333; ATTN:PRA 0920-XXXX. Do not send the completed petition form to this address. Completed petitions are to be submitted to NIOSH at the address provided in these instructions. Persons are not required to respond to the information collected on this form unless it displays a currently valid OMB number.

Privacy Act Advisement

In accordance with the Privacy Act of 1974, as amended (5 U.S.C. § 552a), you are hereby notified of the following:

The Energy Employees Occupational Illness Compensation Program Act (42 U.S.C. §§ 7384-7385) (EEOICPA) authorizes the President to designate additional classes of employees to be included in the Special Exposure Cohort (SEC). EEOICPA authorizes HHS to implement its responsibilities with the assistance of the National Institute for Occupational Safety (NIOSH), an Institute of the Centers for Disease Control and Prevention. Information obtained by NIOSH in connection with petitions for including additional classes of employees in the SEC will be used to evaluate the petition and report findings to the Advisory Board on Radiation and Worker Health and HHS.

Records containing identifiable information become part of an existing NIOSH system of records under the Privacy Act, 09-20-147 "Occupational Health Epidemiological Studies and EEOICPA Program Records. HHS/CDC/NIOSH." These records are treated in a confidential manner, unless otherwise compelled by law. Disclosures that NIOSH may need to make for the processing of your petition or other purposes are listed below.

NIOSH may need to disclose personal identifying information to: (a) the Department of Energy, other federal agencies, other government or private entities and to private sector employers to permit these entities to retrieve records required by NIOSH; (b) identified witnesses as designated by NIOSH so that these individuals can provide information to assist with the evaluation of SEC petitions; (c) contractors assisting NIOSH; (d) collaborating researchers, under certain limited circumstances to conduct further investigations; (e) Federal, state and local agencies for law enforcement purposes; and (f) a Member of Congress or a Congressional staff member in response to a verified inquiry.

This notice applies to all forms and informational requests that you may receive from NIOSH in connection with the evaluation of an SEC petition.

Use of the NIOSH petition forms (A and B) is voluntary but your provision of information required by these forms is mandatory for the consideration of a petition, as specified under 42 CFR Part 83. Petitions that fail to provide required information may not be considered by HHS.

I would like to give a bit more background and detail regarding the rationale behind the Petition for Special Exposure Cohort Status for the Iowa Army Ammunition Plant, IAAP/BAECP, workforce.

Background

Throughout the DOE collaborative agreement- Former Worker Program for AEC/DOE contract workers in the Middletown, Iowa, IAAP there have been amazing opportunities to hear the firsthand accounts of these IAAP workers as regards their tasks and exposures. Energy workers located at the Iowa Army Ammunition Plant (also known as the Burlington Atomic Energy Commission Plant) were exposed to uranium, plutonium, and tritium, (and possibly other radionuclides), in the course of assembling and disabling nuclear weapons from 1947 until 1974.

This DOE facility (one of only two in our country doing these particular tasks) was responsible for assembly, disassembly and repair operations of various nuclear weapons from various sources. The process involved assembly of weapons components arriving from other facilities, manufacture of high explosives components of said weapons and a variety of repair or modifications processes. By workers' memories it would appear that teardown and repair work was a large portion of the work at times and that such work was often done on weapons initially assembled at Pantex.

A large fraction of these IAAP workers worked directly with or in very close proximity to hand held radioactive plutonium "pits" of these weapons. These were the innermost radioactive or fissile components of atomic bombs consisting of critical masses of plutonium and other metals with unstable nuclei selected for their properties of emitting "radioactivity". Many of these workers report holding the pits in their hands with only cotton gloves with rare or no radiation monitoring and little or no shielding from the radiation, (no glove boxes or lead aprons).

Personal interviews of production workers also indicate those even if badges were provided, they often were not worn by the workers in the bays but were left either in their lockers or on a main storage board so they would not lose them. It should be noted that when badges were worn as directed, it would have been at the lapel thus placing the film badge at a greater distance from the pit than the workers' torso and pelvis would have been. In addition, only a small minority (approximately 20 percent) of the Line 1 workforce (Line 1 was the designated DOE line) were ever issued badges and there were periods when none or very few individuals were monitored.

The NIOSH Site Profile provides documentation that the radiation exposure assessment was incomplete and inadequate. Exposure data is sorely lacking and the Health Physicists made a variety of assumptions in the site profile process. Where data are non-existent, extrapolations of exposure where made using other facilities from other eras involved in other manufacturing processes.

According to the NIOSH, no records have been located that indicate any individual monitoring of internal doses of radionuclides (i.e. plutonium, uranium or tritium) occurred between 1947 and 1975. No wrist or finger monitor data exist for these workers. Furthermore, between 1947 and 1955, no dosimetry badges at all have been located to indicate the doses of external penetrating radiation to which such workers were exposed. Finally, records indicate that only 8 to 23 workers in a workforce of over 1,000 were monitored for external radiation doses between 1955 and 1962. Even at the high point of screening at the Iowa Army Ammunition plant from 1970 until 1975, only 20 - 25 percent of the workforce were screened for exposure to external radiation and none have records for internal dosages.

It appears that there is on one hand a scientific rationale to strongly suspect that handling of plutonium or mixed fissile material pits would have put this workforce at increased risk of cancer from ionizing radiation. On the other hand, there is insufficient documentation of past radiation sources and processes to reconstruct past radiation dose with any validity for these workers. If doses are reconstructed based on poorly documented processes that occurred 28 to over 54 years ago, the number and magnitude of assumptions needed to arrive at a "reconstructed" or estimated dose surely precludes the validity of such an estimate.

The following paragraphs list just some of the deficiencies that make accurate or even worst case retrospective dose assessment impossible with any degree of confidence. A major concern is that there is so very little information documenting even the record keeping procedures and methods that were historically used to censor data and administratively assign dose.

External Radiation Exposure Assessment Problems

Several area monitoring records have been located that document the potential for high external radiation exposure even though the location of these area measurements were not in proximity to the actual immediate work area where higher exposures took place. Data from area monitoring in this facility documents cases of exposure in excess of OSHA standards. The 23-39-21 Yard C storage building had a yearly average of 18.2.rem. The 1-73 storage and receiving building had a yearly average of 16.9 rem. The 23-39-21 Yard C storage building had a yearly average of 14.6 rem. The 1-77 storage and receiving building, which replaced the 1-73 storage area, and receiving building had a yearly average of 11.7 rem. The 23-39-7 Yard C storage building had a yearly average of 7.8 rem. It would appear obvious that workers in such areas would be in significantly closer proximity to the radiation sources than monitors on the walls

Unfortunately, documentation is non-existent regarding even general protocols for area, or even personal, exposure monitoring.

No records have been found that document the radiation sources, source term, uniformity of exposures, potential for airborne dispersion, radiation energy spectrum, particle size distribution, etc. that were in the work area with the employees on a day-to-day basis at the plant. Detailed information of this type with chemical form of the radionuclide would be required to validly reconstruct past radiation exposure. It is understandable because of the tight security that much of this information was not maintained.

Reports indicated occasional sampling for Cesium-137, but no work process ever reported use of this radionuclide. There may have been other exposure scenarios without documentation.

There were 20 plus years when virtually no one was regularly monitored and thereafter monitoring was was still limited to subsets of employees leaving out large groups of exposed workers, (i.e. those doing disassembly tasks who apparently were never monitored). Film badge records for external whole body radiation only exist for the years of 1965, 1966 and the years 1968 to 1975. Technicians checking the explosive wave lenses by X-ray wore most of the film badges. No data is available on work related diagnostic x-ray and gamma sources, which were a large part of the quality assurance process.

YEAR	PEOPLE
1965	46
1966	51
1967	
1968	176
1969	211
1970	288
1971	399
1972	432
1973	400
1974	173
1975	33

There are no records of hand and arm exposures. Hand and arms would undoubtedly get more external radiation exposure followed by pelvis and torso.

In many cases, the external dose records indicate readings of zero. It is unknown whether this indicated no significant readings above minimum detectable levels or whether there were other problems with the data (such as a missing detector, etc).

Only about 20% of the workforce identified as Line 1 workers were ever issued film badges-by estimates. The limited monitoring points out the minimal recognition regarding safety since all the work force was at an increased risk of exposure.

Several groups of employees, who worked in close proximity to the fissile material, or pits, were only occasionally, and often never, provided film badges to document external radiation exposure. These groups include: The Physical Security Management Staff who were responsible for receiving and supervising transport and storage of pits and gases. The Safety Department personnel, the transport staff, a variety of tradesmen, (largely mechanics who performed a variety of tasks in the production areas) and guards of the Physical Security Department who roamed the entire area.

Personal interviews of production workers also indicate that even if badges were provided, they often were not worn by these workers in the bays, with the supervisors' knowledge, but were left either in their lockers or on a main storage board.

For the years where radiation reports are available, the accuracy and the precision of the readings are very questionable.

The radiation detectors used during the time period of work at IAAP were not very accurate and poorly reflected actual employee exposure in most cases. A report* as recent as 1981 of controlled exposures indicated that film dosimetry lacked both precision and accuracy and yielded underestimates of true neutron exposure approaching 80% in some instances. The film from the 1950s through mid 1970s produced even less accurate and precise estimates of the true personal exposure. For example, a study** of film detector performance performed by Pacific Northwest Laboratories for the Atomic Energy Commission as late as the mid 1960s documented that the relative error of the film badge for common types of x-ray and neutron exposure exceeded 500%.

By report from senior Health Physicists involved with AEC work during this era, spot checks of the film in the radiation records files indicated that the original reads were suspect. In this spot check it was determined that neutron doses may have been under reported by a factor of 5 to 10 times. There are reportedly several news paper articles on this topic in the Rocky Mountain News Paper probably in the 1993 - 1996 time frame. Reportedly as a result of questions regarding accuracy of neutron detectors at Rocky Flats DOE-RFFO felt that is was imperative to initiate the Neutron Dose Reconstruction Project (NDRP).

*Sims, C.S., Swaja, R.E. personnel Dosimetry Intercomparisons Studies at the Health Physics Research Reactor: A Summary (1974-1980). Health Physics, 42(1): 3-18, 1982.

**Larson, H.V, Unruh, C.M., Beetle T.M., Keene, A.R. Factors Involved in Establishing Film Dosimeter Performance Criteria, in Radiation Dose Measurements, Their Purpose, Interpretation, and Required Accuracy in Radiological Protection. European Nuclear Energy Agency, pp. 191- 208, 1967.

There are no reports of radiation detector calibrations or the existence of calibration films (e.g., films with well-documented delivered neutron doses). These are required to assess the accuracy of the detectors. The wife of the primary on-site detector repairman/calibrator reported that her husband died at an early age from cancer.

No documentation exists concerning where the background/control dosimeters were stored and how background subtraction for detectors was performed and validated.

There are no records documenting whether or not a single generic background track density was used for all buildings and all personnel.

There are no records to indicate how much surface area of the film from the badge was evaluated. This would help determine the precision of the measurements.

There are no records regarding whether any neutron spectra measurements were made in the areas where the workers handled the material to assure that the detectors could measure all the relevant spectra.

No routine dose rate survey data has been located from either the radiation monitors or health physics technicians using gamma dose rate instruments and neutron dose rate instruments.

No data are available to indicate that adjustments were made to account for dosimeter responses to low energy radiation.

Curiously, not one radiation related incident or investigation report was included in the IAAP plant records for the entire period 1945 to 1975. Perhaps more disturbing is that there are records documenting contamination such as the collection and transport of clothes to Pantex for plutonium contamination, but no information regarding personal exposure to the people wearing the clothes. The question of whether plutonium exposure was possible given this history of possible clothing contamination and worker histories of early weapons handling is troublesome. **The implication of no radiation incidents is that monitoring was not as rigorous and potential for risk was much greater than reported in the original site profile for this site.**

Internal Radiation Exposure Assessment Problems

Internal radiation dose assessment is an essential part of retrospective radiation dose assessment. However, no documents have been located to either document protocols to assess internal doses (analytical methods, detection limits, interferences) or that report findings.

While we have first hand accounts that workers were monitored for internal body burdens, no radiation dose estimates related to internal radionuclide body burdens were ever entered into any of the dose records for the workers.

There must have been significant potential for internal exposure since at least one technician reported performing urinalysis since the early 1950s. However, the technician indicated the urine was only monitored for tritium.

The frequency and/or results of urine testing is not available.

The relationship of urine sampling time in relation to time at exposure was also not documented.

Surrogate information for internal dosimetry such as records from air monitor measurements or contamination monitors are non existent.

There is some qualitative data regarding removable radioactive contamination both from various indoor work sites on Line 1 swiped in June 2000, and more worrisome, pages of historically positive swipe tests from the containers in which the pits arrived. There are also records on the site documenting that soil was tested for plutonium contamination, however results of these tests have not been found.

However, given this information -

- No documentation has been found that nasal smears were ever taken for plutonium, or any other radionuclide, to assess possible inhalation.
- No documentation has been found documenting the results from in vivo measurements.
- No documentation has been found that urine or fecal analyses were performed for plutonium or other radionuclide.
- No documentation is found regarding the solubility of the potential inhaled or ingested compounds.
- Personal employee records do not contain external dose in the vast majority of cases and internal dose data has not appeared in any records reviewed.

The majority of the exposed work force was not routinely monitored, especially prior to 1968. IT appears that throughout the history of the facilities' operations, radiation monitoring was inadequate in that neutron radiation monitoring was not performed; biological monitoring (urine, nasal swabs, etc.) was not performed; no extremity monitoring (ring or bracelet monitors) was performed.

Several area monitoring levels indicate exposure levels at the wall which exceed OSHA exposure limits and the proximity of workers to pits and weapons would be expected to be much closer than the area monitors were to the radioactive materials. Entire workforces (job groups) were not monitored at all including guards, disassembly workers and other respondents from the cohort who report working with pits but never being monitored. The adequacy of the badges used is called into question by the lack of available SOPs, QA and validation data and personal discussion with senior health physicists.

The differences in exposure levels reported between IAAP workers and Pantex workers suggest a technological or monitoring problem, as do the increased exposure levels seen at the IAAP from 62-67 as compared to after 1968. The explanations proffered by the health physicist at the NIOSH/DOL meeting with workers in Burlington reflect an obvious bias that the difference in exposures documented could only reflect a difference in dose with no acknowledgement of a potential for technologic or reader error. The possibility of underestimation of dose seems to be real based upon technologic limitations, lack of validation and variability noted in the data. It does not appear to be possible to recreate the range and scope of potential exposures to this workforce without concurrent exposure data from this site with adequate quality assurance nor relevant scientific experimental data with adequate controls. The fact that there has never been a radiation incident report in over 25 years of operation is odd and implies a lack of recognition and or reporting as well as insufficient exposure monitoring.

Certainly the fact that there was no health physicist per se at the IAAP is telling especially given the large staff devoted to Environmental Health and Safety at the Pantex plant currently. Reportedly there are seventy, (70), plus technologic staff devoted to radiation safety at Pantex not to mention Industrial Hygiene and other EH&S staff. This large number of radiation safety staff seems to reflect a great change in the recognition of the hazard and risk imposed by this work.

This workforce reported never using lead aprons when near or handling pits. The NIOSH site profile for the Pantex site reports on page 15 of 17 (ORAU-TX8S-0013-2) that workers wore lead aprons because: "Direct handling of pits can result in high dose rates." This strikes us as a clear assumption by this Health Physicist author of increased risk associated with handling pits without worker protection at Pantex, a situation that was the norm at the IAAP.

What badge data is available is suspect for several reasons as noted above (lack of validation etc., inconsistency with PANTEX, inconsistency over time, vast majority exposed not monitored, etc). In addition, these badges were worn on lapels at a greater distance from the pit than the workers' abdomens, pelvis and arms.

Similarly what neutron dose data exists may have been underestimating exposure due to neutron fading (monthly or multi-month monitoring as opposed to weekly or biweekly lengths of monitoring).

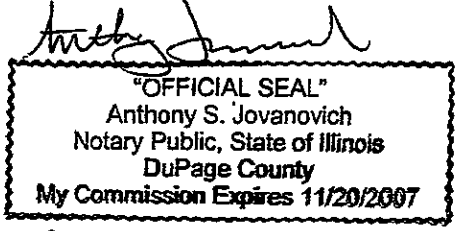
The site profile appears to rely too strongly on too few respondents, too few and possibly the wrong individuals and/or too few job tasks monitored (disassembly).

The issue of "cladding" or shielding is unsettling. From worker interviews it appears likely that not all pits were "clad" in beryllium and/or depleted uranium. There may well be situations by which workers would have had potential for exposure to poorly clad pits. One was in the assembly of the Mark 6 weapons during which workers reported handling a hollow sphere in the core of the assembly and handling a threaded cap that could close this central portion of the assembly. They stated that this assembly unit required an "initiator unit for arming" which was placed in flight. These workers reported running their bare hands along the inside of this hollow sphere to ensure it's smoothness and cleanliness. In addition by workers' report, the reported frequent dismantling of pits apparently may have - in some early configurations - involved removal of the metallic hemispheres covering the pits in addition to removal of the high explosive "lens" coverings. Certainly the heat emanating from these pits as described routinely by these workers implies at least internal alpha radiation in these pits and presumably poorly characterized neutron and gamma radiation as well. The additional questions of the efficacy of the various forms of cladding and the potential of beryllium elements of the cladding to act as neutron sources themselves or even just to slow neutrons down may have significant undetermined impact on the risk to workers from ionizing radiation.

This special energy cohort is a predominantly elderly group of retirees, many with high rates of suspected work-related diseases including reported cases of Glioblastoma, Other Brain Cancer, Leukemia, Lymphoma, Thyroid, Lung, and Bladder Cancers and Pneumoconiosis in addition to the expected plethora of more common diseases. Approximately twenty-five of these workers have died in the last year and a half. We have had over 500 claims for radiation induced cancers arise from our facility and none have been accepted yet on the argument that there is not sufficient evidence for radiation exposure. Many of these workers will not survive the anticipated process of dose reconstruction. These claimants and their families are seeing their faith in their governments' intentions eroded by the current process which is operating so slowly that claimants are dying much faster than claims are being processed.

On the basis of these concerns regarding the completeness, adequacy, and accuracy of both the available exposure assessment records and work practices and on the rational assumption of risk based upon direct handling of plutonium pits and pit containing weapons, we suggest that dose reconstruction cannot yield valid information. **Special Exposure Cohort Status ought to be granted to this IAAP cohort who routinely worked in close proximity to radioactive sources and became ill**

Sincerely,



Barbara One R.B.

Name and social security number of first petitioner:

B Survivor Information — Complete Section B if you are a Survivor or representing a Survivor.

B.1 **Name of Survivor:**

Mr./Mrs./Ms. First Name Middle Initial Last Name

B.2 **Social Security Number of Survivor:**

B.3 **Address of Survivor:**

Street Apt # P.O. Box

City State Zip Code

B.4 **Telephone Number of Survivor:** ( ) -

B.5 **Email Address of Survivor:**

B.6 **Relationship to Employee:** ☐ Spouse ☐ Son/Daughter ☒ Parent ☐ Grandparent ☐ Grandchild

Go to Part C.

C Employee Information — Complete Section C UNLESS you are a labor organization.

C.1 **Name of Employee:**

Mr./Mrs./Ms. First Name Middle Initial Last Name

C.2 **Former Name of Employee** (e.g., maiden name/legal name change/other):

Same

Mr./Mrs./Ms. First Name Middle Initial Last Name

C.3 **Social Security Number of Employee:**

C.4 **Address of Employee** (if living):

dead

Street Apt # P.O. Box

City State Zip Code

C.5 **Telephone Number of Employee:** ( ) -

C.6 **Email Address of Employee:**

C.7 **Employment Information Related to Petition:**

C.7a Employee Number (if known):

C.7b Dates of Employment: Start [redacted] End [redacted]

C.7c Employer Name: Atomic Energy Commission Plant E.A.A.P.

C.7d Work Site Location: Middletown Pa.

C.7e Supervisor's Name: [redacted]

Go to Part E.

E Proposed Definition of Employee Class Covered by Petition — Complete Section E.

E.1 **Name of DOE or AWE Facility:** Atomic Energy Commission Plant

E.2 **Locations at the Facility relevant to this petition:**
MiddleTown Pa.

E.3 **List job titles and/or job duties of employees included in the class. In addition, you can list by name any individuals other than petitioners identified on this form who you believe should be included in this class:**

E.4 **Employment Dates relevant to this petition:**

Start _____ End _____

Start _____ End _____

Start _____ End _____

E.5 **Is the petition based on one or more unmonitored, unrecorded, or inadequately monitored or recorded exposure incidents?:** ☑ Yes ☐ No

If yes, provide the date(s) of the incident(s) and a complete description (attach additional pages as necessary):

He had no monitoring, no records. He was there and saw the test fires. Walked Threw the area afterwards. Brought the natural home in the cuff of his pants. He wore his own clothes. No protection at all.

Go to Part F

Name or Social Security Number of First Petitioner: _____

F Basis for Proposing that Records and Information are Inadequate for Individual Dose — Complete Section F.

Complete **at least one** of the following entries in this section by checking the appropriate box and providing the required information related to the selection. You are not required to complete more than one entry.

F.1 ☐ I/We have attached either documents or statements provided by affidavit that indicate that radiation exposures and radiation doses potentially incurred by members of the proposed class, that relate to this petition, were not monitored, either through personal monitoring or through area monitoring.

(Attach documents and/or affidavits to the back of the petition form.)

Describe as completely as possible, to the extent it might be unclear, how the attached documentation and/or affidavit(s) indicate that potential radiation exposures were not monitored.

F.2 ☒ I/ We have attached either documents or statements provided by affidavit that indicate that radiation monitoring records for members of the proposed class have been lost, falsified, or destroyed; or that there is no information regarding monitoring, source, source term, or process from the site where the employees worked.

(Attach documents and/or affidavits to the back of the petition form.)

Describe as completely as possible, to the extent it might be unclear, how the attached documentation and/or affidavit(s) indicate that radiation monitoring records for members of the proposed class have been lost, altered illegally, or destroyed.

They did not provide these safetys To There employees.

Part F is continued on the following page.

F.3 ☐ I/We have attached a report from a health physicist or other individual with expertise in radiation dose reconstruction documenting the limitations of existing DOE or AWE records on radiation exposures at the facility, as relevant to the petition. The report specifies the basis for believing these documented limitations might prevent the completion of dose reconstructions for members of the class under 42 CFR Part 82 and related NIOSH technical implementation guidelines.

(Attach report to the back of the petition form.)

F.4 ☐ I/We have attached a scientific or technical report, issued by a government agency of the Executive Branch of Government or the General Accounting Office, the Nuclear Regulatory Commission, or the Defense Nuclear Facilities Safety Board, or published in a peer-reviewed journal, that identifies dosimetry and related information that are unavailable (due to either a lack of monitoring or the destruction or loss of records) for estimating the radiation doses of employees covered by the petition.

(Attach report to the back of the petition form.)

Go to Page 6

G Signature of Person(s) Submitting this Petition — Complete Section G.

All Petitioners should sign and date the petition. A maximum of three persons may sign the petition.

Signature _____ Date 6-10-04

Signature _____ Date 6-12-04

Signature _____ Date 6-12-04

Notice: Any person who knowingly makes any false statement, misrepresentation, concealment of fact or any other act of fraud to obtain compensation as provided under EEOICPA or who knowingly accepts compensation to which that person is not entitled is subject to civil or administrative remedies as well as felony criminal prosecution and may, under appropriate criminal provisions, be punished by a fine or imprisonment or both. I affirm that the information provided on this form is accurate and true.

Send this form to:
SEC Petition
Office of Compensation Analysis and Support
NIOSH
4676 Columbia Parkway, MS-C-47
Cincinnati, OH 45226

If there are additional petitioners, they must complete the Appendix Forms for additional petitioners. The Appendix forms are located at the end of this document.

Name or Social Security Number of First Petitioner: _____

08-04-04

T
These notarized paper are to be added to
file of his Special Cohort Exposure. There is one for the F-
1 and one for the E-5. His file number is

Thank you

08-09-04P03:43 RCVD

E-5

8-04-04

My dad worked on line 1 at the I.A.A.P. as a [illegible]e was witness to many test firers of nuclear weapons. Afer the firers he would walk threw the area. He would lay on the floor, where there was dust from the weapons, that was everywhere. He would come home from work with that dust all over his clothes. I remember one time in the 1960,s he came home from work and told me to get something small, so he could put this gray powder in that was in his pants cuff. I did know what to get him to put it in and dad told to get a pop cap. I fold one and, he He put the gray powder in it and set it on the window sill. He told us never to touch it. I thought he said it was C5. He He said it was very dangerous. They did not supply dad with work clothes. He wore his own clothes.
I can not tell you about any of dad coworkers. They are dead from cancer.

Thank you

KATHERINE R. FRAISE
Commission Number 710496
My Commission Expires
12-6-07

08-04-04-

F-1

My dad _____ did not have a monitoring badges issued to him. He had no way of knowing if he got to much radiation. He worked in all the area of line 1. He had clearence to the whole line because he was a _____. He should have had a badge to determine how much radiation he got. They did not offer him one. I do not know why they would not issue a badge. They are still cleaning up line 1. They are now talking about burning the building. The radiation is still there.So how can they say he didn, get radiation, when it is still out their after all these years? How can they judge someone when they have no proof? How can they compare someone to another person when they didn,t do the same work or be in the same plant? The way you can treat my dad fair is put him on the Special Cohora Exposure and approve him.

Thank you

KATHERINE R. FRAISE
Commission Number 710496
My Commission Expires
6-6-07

Special Exposure Cohort Petition
under the Energy Employees Occupational Illness Compensation Act

U.S. Department of Health and Human Services
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health

Special Exposure Cohort Petition — Form B

OMB Number: 0920-0639 Expires: 05/31/2007

B Survivor Information — Complete Section B if you are a Survivor or representing a Survivor.

B.1 **Name of Survivor**

Mr./Mrs./Ms. First Name Middle Initial Last Name

B.2 **Social Security Number of Survivor:** –

B.3 **Address of Survivor**

Street Apt # P.O. Box

City State Zip Code

B.4 **Telephone Number of Survivor:**

B.5 **Email Address of Survivor:** 0

B.6 **Relationship to Employee:** ☐ Spouse ☐ Son/Daughter ☐ Parent ☐ Grandparent ☐ Grandchild

Go to Part C

C Employee Information — Complete Section C UNLESS you are a labor organization.

C.1 **Name of Employee**

Mr./Mrs./Ms. First Name Middle Initial Last Name

C.2 **Former Name of Employee (e.g., maiden name/legal name change/other):** SAME

Mr./Mrs./Ms. First Name Middle Initial Last Name

C.3 **Social Security Number of Employee:** –

C.4 **Address of Employee (Living)**

Street Apt # P.O. Box

City State Zip Code

C.5 **Telephone Number of Employee:**

C.6 **Email Address of Employee:** N/A

C.7 **Employment Information Related to Petition**

C.7a Employee Number (if known): –

C.7b Dates of Employment: Start End

C.7c Employer Name: MASON HANGER SILAS MASON CO, INC

C.7d Work Site Location: BURLINGTON A.E.C. PLANT - IAAP

C.7e Supervisor's Name: [redacted]

Go to Part E