



National Institute for
Occupational Safety and Health
Centers for Disease Control
and Prevention (CDC)
200 Independence Avenue, SW
Washington, DC 20201

DATE:

TO: The Secretary
Through: DS

COS
ES
CDC

FROM: Director
National Institute for Occupational Safety and Health

SUBJECT: Designating Certain Employees of the Mound Plant near Dayton, Ohio, as
Members of the Special Exposure Cohort under the Energy Employees
Occupational Illness Compensation Program Act of 2000 – ACTION

Action Required: Submit Report to Congress by March 3, 2008

ISSUE

Attached for your approval and signature is a proposed designation to add certain employees from the Mound Plant as members of the Special Exposure Cohort (SEC) under the Energy Employees Occupational Illness Compensation Program Act (EEOICPA), 42 U.S.C. § 7384q (Tab A).

DISCUSSION

EEOICPA established an SEC, a designation applied to certain classes of employees who worked at United States nuclear weapons production facilities of the Department of Energy (DOE) or Atomic Weapons Employers (AWEs). EEOICPA confers upon SEC designees a presumption of causation regarding the relation of their cancers to their employment at a DOE or AWE facility. This presumption allows them to obtain federal compensation under EEOICPA if they incur at least one of a list of "specified cancers" that, under EEOICPA, are presumptively linked with occupational exposures to radiation at DOE and AWE facilities. EEOICPA initially included four classes of employees in the SEC and provided that the President could designate additional classes as members of the SEC if certain statutory conditions are met. The authority to designate additional members was delegated by the President to the Secretary of the Department of Health and Human Services (HHS), who promulgated procedures for doing so

(42 C.F.R. pt. 83, Tab B). Since these procedures were promulgated, Congress has amended EEOICPA to mandate that HHS report to Congress on both decisions to add and decisions to deny a designation within 30 days of HHS receiving a recommendation by the Advisory Board on Radiation and Worker Health (Board) to add the class to the SEC. Failure to report to Congress within this 30-day deadline would result in the automatic addition of the class to the SEC.

Under the HHS procedures for designating additional members of the SEC, the National Institute for Occupational Safety and Health (NIOSH) received an SEC petition representing certain workers at the Mound Plant near Dayton, Ohio (Tab C). NIOSH evaluated the petition and presented the findings (Tab D) at the Board meeting in Las Vegas, Nevada, on January 8, 2008. The NIOSH evaluation recommended adding the following proposed class to the SEC:

Employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors or subcontractors who worked in any areas at the Mound Plant site from October 1, 1949, through February 28, 1959, for a number of work days aggregating at least 250 work days or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

The Mound site conducted diverse activities in research and chemical engineering. The radionuclides radium-226, actinium-227, and thorium-228 were used in research on the production of Ac-227 for use as a substitute for polonium in neutron initiators. Decontamination and decommissioning of the building where the work was done was completed in February 1959. NIOSH has access to a limited number of bioassay results for these radionuclides; however, interpretation of the results is uncertain. NIOSH cannot bound the internal dose for these radionuclides from October 1, 1949, through February 28, 1959, and does not know which workers were exposed. During that time period, NIOSH has determined that internal doses for the proposed class cannot be determined with sufficient accuracy for the following reasons:

1. NIOSH has access to a limited number of bioassay results for these radionuclides; however, interpretation of the results is uncertain.
2. While it is likely that the bioassay results possessed by NIOSH relate to the workers directly involved in the separation operation, it is not known what fraction of those workers was sampled for the bioassays.
3. There is strong evidence that airborne contamination was produced by the separation process. The limited number of individuals for whom radium-226, actinium-227, and thorium-228 bioassay results are available suggests that the larger population was unmonitored for potential intakes.
4. The reported airborne contamination concentrations are relatively high in some cases, suggesting the potential for non-trivial intakes and consequent internal doses.

External dose monitoring was part of the personnel protective practice from the early days at Mound, starting with the first operational process, polonium neutron source preparation. External

dose monitoring continued throughout Mound's operational history. Records of radiation exposures from personnel dosimeters are available from the beginning of operations, and for all years of the proposed class time period. Mound facilities and soil are unlikely to have contributed significantly to the ambient environmental dose. The ambient environmental dose would be accounted for in, and bounded from, the occupational monitoring data for personnel.

The health endangerment determination is governed by EEOICPA and 42 C.F.R. § 83.13(c)(3) and § 83.14(b). Pursuant to these requirements, if it is not feasible to estimate with sufficient accuracy radiation doses for members of the class, then NIOSH must determine that there is a reasonable likelihood that such radiation doses may have endangered the health of members of the class. The regulations require NIOSH to assume that any duration of unprotected exposure may have endangered the health of members of a class when it has been established that the class may have been exposed to radiation during a discrete incident likely to have involved levels of exposure similarly high to those occurring during nuclear criticality incidents. If the occurrence of such an exceptionally high-level exposure has not been established, then NIOSH is required to specify that health was endangered for those workers who were employed for a number of work days aggregating at least 250 work days within the parameters established for the class or in combination with work days within the parameters established for one or more other classes of employees in the SEC. NIOSH has determined that members of the class were not exposed to radiation during a discrete incident likely to have involved levels of exposure similarly high to those occurring during nuclear criticality incidents. However, the evidence NIOSH reviewed indicates that some workers in the class may have accumulated chronic radiation exposures through intakes of radionuclides. In summary, NIOSH determined that it is not feasible to estimate with sufficient accuracy the radiation dose and that the health of the proposed class of employees may have been endangered.

Although NIOSH found that it is not possible to completely reconstruct radiation doses for the workers in the proposed class, NIOSH determined that it is possible to reconstruct certain internal dose, all external dose, and occupational medical dose. NIOSH intends to use any available, reliable data that may be included in an individual's file (and that can be interpreted using existing NIOSH dose reconstruction processes or procedures) to support a partial dose reconstruction for non-presumptive cancers and/or cases that have less than 250 work days of employment.

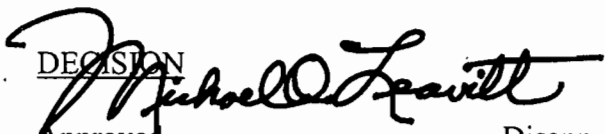
NIOSH is continuing to investigate whether it is feasible to estimate dose for workers from the 1990s through 2006, who were included in the petition by the petitioners.

After consideration of the NIOSH presentation, the Board voted to advise the Secretary to add the class. The Board vote was 11–0, with one member recused due to conflict of interest. The Board letter to the Secretary, received on February 1, 2008, is Tab E. The transcript of the Board discussion is Tab F.


The petitioner may seek an administrative review of certain HHS decisions, either a class denial or a 250-workday health endangerment requirement, as specified in the HHS SEC procedures (42 C.F.R. § 83.18(a), Tab B).

RECOMMENDATIONS

Based upon the foregoing, the Director of NIOSH and the Director of CDC recommend that the Secretary approve and sign the attached designation to add to the SEC certain employees from the Mound Plant.

DECISION


Approved _____ Disapproved _____ Date MAR - 3 2008


John Howard, M.D.

7 Attachments:

- Tab A – Designation of a Class of Employees from Mound
- Tab B – 42 C.F.R. pt. 83
- Tab C – Mound SEC Petition
- Tab D – NIOSH SEC Petition Evaluation Report, *SEC-00090*
- Tab E – Board Recommendation Letter to Secretary Leavitt
- Tab F – Transcripts of relevant Board discussions



THE SECRETARY OF HEALTH AND HUMAN SERVICES
WASHINGTON, D.C. 20201

MAR - 3 2008

The Honorable Harry Reid
Majority Leader
United States Senate
Washington, D.C. 20510

Dear Senator Reid:

Pursuant to the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA) and 42 C.F.R. pt. 83, a petition was filed on behalf of workers from the Mound Plant near Dayton, Ohio, to be added to the Special Exposure Cohort (SEC).

The Centers for Disease Control and Prevention's (CDC) National Institute for Occupational Safety and Health (NIOSH) evaluated the petition and presented its findings to the Advisory Board on Radiation and Worker Health (Board) on January 8, 2008. The Board considered the petition, and on February 1, 2008, I received the Board's recommendation concerning this petition. I have also received the deliberations, findings, and recommendations of the Director of NIOSH and the Director of CDC. I have designated the following class for addition to the SEC:

Employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors or subcontractors who worked in any areas at the Mound Plant site from October 1, 1949, through February 28, 1959, for a number of work days aggregating at least 250 work days or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

The criteria and findings upon which this designation is based are provided in the enclosed report.

Please call me if you have any further questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Michael O. Leavitt". The signature is written in a cursive style with a large initial "M".

Michael O. Leavitt

Enclosure



THE SECRETARY OF HEALTH AND HUMAN SERVICES
WASHINGTON, D.C. 20201

MAR - 3 2008

The Honorable Mitch McConnell
Minority Leader
United States Senate
Washington, D.C. 20510

Dear Senator McConnell:

Pursuant to the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA) and 42 C.F.R. pt. 83, a petition was filed on behalf of workers from the Mound Plant near Dayton, Ohio, to be added to the Special Exposure Cohort (SEC).

The Centers for Disease Control and Prevention's (CDC) National Institute for Occupational Safety and Health (NIOSH) evaluated the petition and presented its findings to the Advisory Board on Radiation and Worker Health (Board) on January 8, 2008. The Board considered the petition, and on February 1, 2008, I received the Board's recommendation concerning this petition. I have also received the deliberations, findings, and recommendations of the Director of NIOSH and the Director of CDC. I have designated the following class for addition to the SEC:

Employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors or subcontractors who worked in any areas at the Mound Plant site from October 1, 1949, through February 28, 1959, for a number of work days aggregating at least 250 work days or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

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Please call me if you have any further questions regarding this matter.

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Michael O. Leavitt

Enclosure



THE SECRETARY OF HEALTH AND HUMAN SERVICES
WASHINGTON, D.C. 20201

MAR - 3 2008

The Honorable Nancy Pelosi
Speaker of the House of Representatives
Washington, D.C. 20515

Dear Madam Speaker:

Pursuant to the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA) and 42 C.F.R. pt. 83, a petition was filed on behalf of workers from the Mound Plant near Dayton, Ohio, to be added to the Special Exposure Cohort (SEC).

The Centers for Disease Control and Prevention's (CDC) National Institute for Occupational Safety and Health (NIOSH) evaluated the petition and presented its findings to the Advisory Board on Radiation and Worker Health (Board) on January 8, 2008. The Board considered the petition, and on February 1, 2008, I received the Board's recommendation concerning this petition. I have also received the deliberations, findings, and recommendations of the Director of NIOSH and the Director of CDC. I have designated the following class for addition to the SEC:

Employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors or subcontractors who worked in any areas at the Mound Plant site from October 1, 1949, through February 28, 1959, for a number of work days aggregating at least 250 work days or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

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Michael O. Leavitt

Enclosure



THE SECRETARY OF HEALTH AND HUMAN SERVICES
WASHINGTON, D.C. 20201

MAR - 3 2008

The Honorable John A. Boehner
Minority Leader
United States House of Representatives
Washington, D.C. 20515

Dear Congressman Boehner:

Pursuant to the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA) and 42 C.F.R. pt. 83, a petition was filed on behalf of workers from the Mound Plant near Dayton, Ohio, to be added to the Special Exposure Cohort (SEC).

The Centers for Disease Control and Prevention's (CDC) National Institute for Occupational Safety and Health (NIOSH) evaluated the petition and presented its findings to the Advisory Board on Radiation and Worker Health (Board) on January 8, 2008. The Board considered the petition, and on February 1, 2008, I received the Board's recommendation concerning this petition. I have also received the deliberations, findings, and recommendations of the Director of NIOSH and the Director of CDC. I have designated the following class for addition to the SEC:

Employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors or subcontractors who worked in any areas at the Mound Plant site from October 1, 1949, through February 28, 1959, for a number of work days aggregating at least 250 work days or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

The criteria and findings upon which this designation is based are provided in the enclosed report.

Please call me if you have any further questions regarding this matter.

Sincerely,

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Michael O. Leavitt

Enclosure

Tab A

Designation of a Class of Employees to the Special Exposure Cohort

HHS Designation of Additional Members of the
Special Exposure Cohort
under the
Energy Employees Occupational Illness Compensation Program Act of 2000

Designating a Class of Employees from

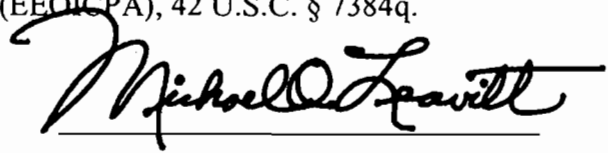
Mound Plant
Miamisburg, Ohio



I. Designation

I, Michael O. Leavitt, Secretary of Health and Human Services (Secretary), designate the class of employees defined in Section II of this report for addition to the Special Exposure Cohort (SEC), as authorized under the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA), 42 U.S.C. § 7384q.

MAR - 3 2008



Date

Michael O. Leavitt

II. Employee Class Definition

Employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors or subcontractors who worked in any areas at the Mound Plant site from October 1, 1949, through February 28, 1959, for a number of work days aggregating at least 250 work days or in combination with work days within the parameters established for one or more other classes of employees in the Special Exposure Cohort.

III. Designation Criteria and Recommendations

Pursuant to 42 U.S.C. § 7384q, for the class defined in Section II of this report, the Secretary has determined, and the Advisory Board on Radiation and Worker Health (Board) has recommended, that

- (1) it is not feasible to estimate with sufficient accuracy the radiation dose that the class received; and
- (2) there is a reasonable likelihood that such radiation dose may have endangered the health of members of the class.

The SEC final rule states in 42 C.F.R. § 83.13(c)(1) that it is feasible in two situations to estimate the radiation dose that the class received with sufficient accuracy. First, the rule states that radiation doses may be estimated with sufficient accuracy if NIOSH has established that it has access to sufficient information to estimate the maximum radiation dose for every type of cancer for which radiation doses are reconstructed that could have been incurred under plausible circumstances by any member of the class. Alternatively, radiation doses may be estimated with sufficient accuracy if NIOSH has established that it has access to sufficient information to estimate the radiation doses of members of the class more precisely than a maximum dose estimate.

The Board, pursuant to 42 U.S.C. § 7384q, advised the Secretary to designate the class as an addition to the SEC in a letter received by the Secretary on February 1, 2008.

IV. Designation Findings

Feasibility of Estimating Radiation Doses with Sufficient Accuracy

The Secretary established the feasibility determination for the class of employees covered by this report based upon the findings summarized below.

- (1) Mound separated radium-226, actinium-227, and thorium-228 from K-65 residues and from irradiated radium. NIOSH has access to a limited number of bioassay results for these radionuclides; however, the results are not definitive.
- (2) While it is likely that the bioassay results that NIOSH has relate to the workers directly involved in the separation operation, the fraction of these workers that was sampled for the bioassays is unknown. For the time period of the designated class, NIOSH determined that internal doses from these radionuclides cannot be determined with sufficient accuracy.
- (3) There is strong evidence that airborne contamination was produced by the separation process. The limited number of individuals for whom radium-226, actinium-227, and thorium-228 bioassay results are available suggests that the larger population was not monitored for potential intakes. The reported airborne contamination concentrations are relatively high in some cases, suggesting the potential for non-trivial intakes and consequent internal doses.
- (4) Pursuant to 42 C.F.R. § 83.13(c)(1), NIOSH determined that there is insufficient information to either: (1) estimate the maximum radiation dose, for every type of cancer for which radiation doses are reconstructed, that could have been incurred under plausible circumstances by any member of the class; or (2) estimate the radiation doses of members of the class more precisely than a maximum dose estimate.
- (5) The Board concurred with the NIOSH evaluation and recommended the proposed class for addition to the SEC.
- (6) Although NIOSH found that it is not possible to completely reconstruct radiation doses for these employees, NIOSH can bound the internal doses arising from exposure to polonium, tritium, plutonium, radon, protactinium, Th-230, Th-232, uranium, and stable metal tritides using the scenarios. NIOSH determined that it is also possible to reconstruct occupational medical dose and all external dose. Therefore, individuals with non-presumptive cancers may be considered for partial dose reconstructions.

Health Endangerment

The Secretary established the health endangerment determination for the class of employees covered by this report based upon the findings summarized below.

- (1) Pursuant to 42 C.F.R. § 83.13(c)(3), NIOSH established that there is a reasonable likelihood that such radiation doses may have endangered the health of members of the class. Pursuant to 42 C.F.R. § 83.13(c)(3)(ii), NIOSH specified a minimum duration of employment to satisfy this health endangerment criterion as “having been employed for a number of work days aggregating at least 250 work days within the parameters established for this class or in combination with work days within the parameters (excluding aggregate work day requirements) established for one or more other classes of employees in the Cohort.”
- (2) NIOSH did not identify any evidence from the petitioners or from other resources that would establish that the class was exposed to radiation during a discrete incident likely to have involved exceptionally high-level exposures, such as a nuclear criticality incident, as defined under 42 C.F.R. § 83.13(c)(3)(i).
- (3) The Board concurred with NIOSH’s finding that the health of the class may have been endangered and defined the class according to the 250-workday requirement specified under 42 C.F.R. § 83.13(c)(3)(ii).

V. Effect and Effective Date of Designation

The Secretary submits this report on the designation of one additional class to the SEC for review by Congress, pursuant to 42 U.S.C. §§ 7384l(14)(C)(ii) and 7384q(c)(2)(A), as amended by the Ronald W. Reagan National Defense Authorization Act for Fiscal Year 2005, Pub. L. No. 108-375 (codified as amended in scattered sections of 42 U.S.C.). Pursuant to 42 U.S.C. § 7384l(14)(C)(ii), as amended by the Ronald W. Reagan National Defense Authorization Act for Fiscal Year 2005, Pub. L. No. 108-375 (codified as amended in scattered sections of 42 U.S.C.), the designation in this report will become effective 30 days after the date of this report’s submission to Congress “unless Congress otherwise provides.”

VI. Administrative Review of Designation

The health endangerment determination of the designation provided in this report may be subject to an administrative review within HHS, pursuant to 42 C.F.R. § 83.18(a). On the basis of such a review, if the Secretary decides to expand the class of employees covered by this designation, the Secretary would transmit a supplementary report to Congress providing the expanded employee class definition and the criteria and findings on which the decision was based.

Tab C
SEC Petition

SEC00090

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

Page 1 of 7

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 right, 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:	<input type="checkbox"/> A Labor Organization,	Start at D	on Page 3
	<input checked="" type="checkbox"/> An Energy Employee (current or former),	Start at C	on Page 2
	<input type="checkbox"/> A Survivor (of a former Energy Employee),	Start at B	on Page 2
	<input type="checkbox"/> 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:

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

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

Name or Social Security Number of First Petitioner: _____

PETITION REVISED 07/16/2007

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

Page 2 of 7

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:	<input type="checkbox"/> Spouse	<input type="checkbox"/> Son/Daughter	<input type="checkbox"/> Parent
	<input type="checkbox"/> Grandparent	<input type="checkbox"/> 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 <u>1965</u>	End	<u>2001</u>
C.7c Employer Name:	<u>MONSANTO, EG&G, BWXT, etc</u>		
C.7d Work Site Location:	<u>MOUND LAB SITE MARIETTA, OH</u>		
C.7e Supervisor's Name:			

Go to Part E.

Name or Social Security Number of First Petitioner. _____

REVISED 07/16/2007

Special Exposure Cohort Petition — Form B

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

N/A

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.

Name or Social Security Number of First Petitioner: _____

Special Exposure Cohort Petition — Form B

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

E.1 Name of DOE or AWE Facility: MOUND SITE - MIAMSBURG, OHIO

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

ALL BUILDINGS AND EXTERNAL WORK SITE AREAS (ALL) WITHIN THE FACILITY BOUNDARY

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:

ALL EMPLOYEES, INCLUDING SUPERVISORY AND CLERICAL AT THE MOUND PLANT

E.4 Employment Dates relevant to this petition:

Start February 1953 1949 End 2001 PRESENT

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):

(07/16/2007)
MOVE TO SECTION F.1

MOUND DEVELOPED A CULTURE OF HAZARD, ADMINISTRATIVE VERY CONTROLLED MONITORING OF WORKERS WITHOUT REGARD TO EMPLOYEE INPUT. INCIDENT OCCURRENCE AND CRITIQUE REPORTING WILL SHOW A PATTERN OF ONE INCIDENT AFTER ANOTHER OF RADIOACTIVELY CONTAMINATED MATERIALS IN NON-CONTROLLED AREAS FOR STORAGE AND SHIPMENT. EMPLOYEES WORKING IN NON-CONTROLLED AREAS WERE PROHIBITED FROM RECEIVING MONITORING

Go to Part F.

Name or Social Security Number of First Petitioner: _____

PETITION REVISED 07/16/2007

Special Exposure Cohort Petition — Form B

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 (1) 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.

MINND LAB DOCUMENTATION WAS VERY CLOSELY GUARDED BY MANAGEMENT AND
PROCEDURE(S). THEY EVEN WENT SO FAR AS TO SEND MINND SECURITY TO THE HOME OF
TO RETRIEVE DOCUMENTS THAT HE TOOK HOME IN AN ATTEMPT TO PROVIDE HIMSELF
DEFENSE IN THE CASE OF FUTURE HEALTH ISSUES. THEREFORE ANY DOCUMENTATION IS ONLY
WITHIN DEPT OF ENERGY RECORDS. THE (DOE) (ORIS) OCCURRENCE REPORTING AND
PROCESSING SYSTEM WILL CONTAIN SOME HISTORIC DATA. IT IS OF COURSE "NOT" AN OPEN
RECORD. THESE RECORDS WERE REMOVED FROM THE MINND SITE TO THE DESERT DUE TO BEING
RADIOACTIVE.

- F.2 (2) 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.

F.1 (2)
CONT'D THE "RAD" DATA BASE WHICH DID EXIST WAS NOT A WELL DESIGNED SOFTWARE AND
THE INTEGRITY OF THE DATA THAT DOES EXIST HAS NO VALUE

Part F is continued on the following page.

AFFAVIT(S) ATTACHED 07/16/2007

Name or Social Security Number of First Petitioner: _____

PETITION REVISED 07/16/2007

Special Exposure Cohort Petition — Form B

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

May 31, 2007

Signature

Date

Signature

Date

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.

PETITION REVISED 07/10/2007

Name or Social Security Number of First Petitioner: _____

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 0920-0639. 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.

PETITION REVISED 07/16

Name or Social Security Number of First Petitioner: _____

May 15, 2007

U. S. Department of Labor
Final Adjudication Branch
1001 Lakeside Avenue, Suite 390
Cleveland, OH 44114

Re:

File Number:

Objection to NIOSH Dose Reconstruction Methodology and 42 U.S.C 73841(9) (B) and 42 U.S.C 7384n (b)

I am appealing the Denial of my claim based on the following reason(s):

A. Causation of my documented Cancers: Current research does not eliminate Hodgkin's Lymphoma and Basal Cell Carcinoma from causation by the exposure factors that were prevalent at the Mound Plant Site. (NIOSH – Sanford Cohen Audit of Mound)

B. Monitoring and Health Records of Mound Lab Plant Employees:

1. Monitoring of potentially radioactive materials and Mound Plant Employees was done in a haphazard way, with changing criteria almost daily. Monitoring of personnel via dosimeter, urinalysis, etc. was even more sporadic and eventually administratively denied to all except those employees chosen by 'Rad Control'. In place Administrative Controls prohibited the collection of Radiological data for most all Mound employees.

2. Mound Plant Employee Health Records are not available. These records were removed from the Mound Plant site in 2005 and buried in the Los Alamos, N.M. desert without the knowledge and permission of the Dept. of Labor (Energy Compensation Program) due to radioactive contamination.

3. Mound Plant Employee Health Records were removed from their storage site at Mound and kept in Building 61 prior to their shipment to the desert site. I was the Supervisor over the crews that were involved with the removal and shipment of these records (materials). These materials sat in Building 61 for a period of time prior to their shipment to Nevada.

I am requesting that the U. S. Department of Labor place the Mound Plant Site in the Special Exposure Cohort Status; so that Mound workers who were exposed to radiation have the opportunity that has been given to other nuclear and radioactive plant workers to receive assistance and compensation benefits. I will be submitting a Petition for Special Exposure Cohort Status with the U.S. Dept. of Health and Human Services.

Sincerely,

Cc: Senators George Voinovich and Sherrod Brown and Representative David Hobson
Copy - submitted to U.S. Dept. of Labor at EEOICPA Hearing on May 15, 2007
File

Report says ill Mound workers treated unfairly

An independent auditor faults the site profile being used to evaluate and often reject compensation claims.

By Tom Beyerlein
Staff Writer

A newly released independent auditor's report punches holes in the source document that the federal government has been using to evaluate — and, in most cases, reject — compensation claims from cancer-stricken former workers at the Miamisburg Mound Plant.

The audit by contractor Sanford Cohen and Associates offers a stinging critique of Mound's program for monitoring workers for radioactive exposures over the years. And it suggests that poor monitoring and record-keeping could make it impossible for the government to accurately assess the claims of sick Mound workers seeking federal compensation.

Sanford Cohen audited a technical "site profile" used by federal officials as the basis for determining whether worker illnesses were caused by workplace exposures.

The National Institute for Occupational Safety and Health has used the profile to process 88 percent of the claims filed by Mound workers — 70 percent of which have been rejected for compensation.

NIOSH will have to reopen those claims if the site profile ultimately is revised by the federal Advisory Board on Radiation and Worker Health, said NIOSH spokeswoman Amanda Harney.

If the government deter-

minally reconstruct worker exposures, Mound could qualify for "special exposure cohort" status that would allow sick workers to automatically receive lump-sum payments and medical benefits if they have certain cancers. Atomic workers who don't have the status can spend years fighting an uphill battle to prove their illnesses were caused by on-the-job toxic exposures.

Workers at the pre-Mound Dayton Project, run by Monsanto Chemical Co., are close to being approved for the special status after a similar audit found it wasn't possible to accurately reconstruct their doses.

To date, the Labor Department has paid 197 of 1,465 claims filed by 719 Mound workers with the Energy Employees Occupational Illness Compensation Act.

One problem pointed out in the audit: Support staff — including administrative, maintenance, security and janitorial workers — were unknowingly exposed to the same hazards as radiation workers, but not monitored.

"It is not clear," the audit said, "how dose estimation would be performed for maintenance and support workers ... whose actual jobs could have led to exposures comparable to radiation workers."

♦♦ Audit: Workers likely exposed to

Mound Plant records buried in New Mexico

Exhumation would cost millions, but they are key to workers' health claims.

By Tom Beyerlein
Staff Writer

At least a dozen pallets of shrink-wrapped cardboard boxes, six 55-gallon drums and 11 safes containing classified records from the Miami-burg Mound Plant are buried in underground shafts in Area G of a radioactive waste landfill at Los Alamos National Laboratory in New Mexico.

Nobody knows the condition of the records, and the Energy Department says it would take up to 18 months and cost as much as \$9 million to unearth and decontaminate them.

But a leading federal health official said Tuesday it may be necessary to dig up the more than 400 boxes of records from the 1980s and 1990s in order to get a clear picture of the hazards workers faced at Mound. The records could

help to determine if hundreds of cancer-stricken Mound workers qualify for federal compensation.

"We are open-minded as to whether (the records) should be exhumed," said Larry J. Elliott, director of compensation analysis for the National Institute for Occupational Safety and Health, or NIOSH. "This is an interesting problem, and we're doing the best we can to make sure that we have the documents we need to do our work."

Elliott's office oversees scientific "dose reconstructions," a paperwork method of estimating atomic workers' exposures to harmful radiation and chemicals. If a reconstruction shows at least a 50 percent probability that a worker's cancer was caused by an on-the-job exposure, the worker qualifies for cash and medical benefits under the Energy Employees Occupational Illness Compensation Program.

But NIOSH can't accurately estimate worker exposures without knowing the hazards present at each of the nation's

atomic plants. Federal contractors working on a "site profile" of Mound hazards went to Los Alamos to view the classified records last year, only to learn the records had been buried as radioactively contaminated waste in 2005. Elliott said it's the largest destruction of compensation-related documents by Energy that he's ever seen.

"I find it amazing that the variety of records here — 12 pallets full — could all be contaminated," Elliott said. "How could it happen?"

According to the Energy Department, Mound shipped 458 boxes of classified records to Los Alamos in 1995 and later reclaimed 40 boxes for an early dose reconstruction project. Los Alamos officials buried the remaining boxes, which contain logbooks, safety analysis reports, Mound studies of the properties of toxic metals used there, and descriptions of a 1989 release of radioactive tritium.

Energy officials are scouring their archives in hopes of finding uncontaminated

copies of the Mound records, and exploring ways to prevent more destruction of documents that could help ailing atomic workers to prove their compensation claims, said department spokeswoman Megan Barnett. "We are looking into it," she said.

"We take this very seriously."

Elliott said he hopes uncontaminated copies of the documents can be found. It may be necessary to exhume the records, he said, but that would require potentially exposing workers in special protective gear to radioactive waste. Elliott said he'll know in a few weeks whether exhumation will be necessary.

In a memo released last week, the Energy Department told the federal Advisory Board on Radiation and Worker Health it would take six months and cost \$1.5 to \$3 million to exhume the records and another year and up to \$6 million to scan them to create uncontaminated copies.

Contact this reporter at (937) 225-2264 or tbeyerlein@daytondailynews.com.

June 7, 2007

Mr. Larry Elliott
Director, Office of Compensation Safety and Health
4676 Columbia Parkway, MS C-46
Cincinnati, Ohio 45226

Dear Mr. Elliott:

Subject: Special Exposure Cohort Petition

Please find enclosed my petition along with former employees, petitioner #2 _____ and petitioner #3 _____ designate a class of employees of the Mound Plant in Miamisburg, Ohio to be included in the Special Exposure Cohort (SEC) under the EEOICPA of 2000. The period of activities covered by this is 1943 to 1970.

The work at Mound was performed in one of the earliest environments where nuclear materials were processed, with exposure controls that, although normal at that time, would be deemed unsuitable by today's standards. Very limited, if any monitoring and exposure data are available for the time period involved, and there are significant uncertainties regarding the monitoring techniques in place at that time. It is likely that radiation and chemical exposure doses during this period could have endangered the health of members of this class of employees and it is not feasible to estimate exposures with reasonable accuracy.

I appreciate your efforts to assist the former employees and their survivors through the SEC process.

Thank You

Sincerely,

() " " "

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
Page 1 of 7

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 right, 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:	<input type="checkbox"/> A Labor Organization,	Start at D on Page 3
	An Energy Employee (current or former),	Start at C on Page 2
	<input checked="" type="checkbox"/> A Survivor (of a former Energy Employee),	Start at B on Page 2
	<input type="checkbox"/> 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:**

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

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

Name or Social Security Number of First Petitioner: _____

Special Exposure Cohort Petition — Form B

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 *Deceased* Apt # P.O. Box

City State Zip Code

C.5 Telephone Number of Employee: *NA*

C.6 Email Address of Employee: *NA*

C.7 Employment Information Related to Petition:

C.7a Employee Number (if known):

C.7b Dates of Employment: Start *1956* End *1983*

C.7c Employer Name: *Mound Plant*

C.7d Work Site Location: *Miamisburg Ohio 45342*

C.7e Supervisor's Name: *>*

Go to Part E.

Name or Social Security Number of First Petitioner:

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

Page 3 of 7

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

Name or Social Security Number of First Petitioner: _____

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

E.1 Name of DOE or AWE Facility: Mound Laboratory Miamisburg, Ohio

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

Buildings HH, PP (Building 38), R, SM, SW, T, and WD/WDA

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:

All scientific, technical, maintenance, production work forces as well as administrative and support staff in these same work areas

E.4 Employment Dates relevant to this petition:

Start 1943 End 1970

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):

The definition of incident is problematic. There is no intention to claim an exposure incident comparable to an uncontrolled fission reaction or criticality incident, only a claim of inadequately monitored and inadequately protected radiation exposed workers. This SEC petition is based on the fact that large quantities of several radionuclides were processed without engineering controls or protection as would be expected by today's standards thus representing a real or rationally expected potential for significant risk from occupational exposure to radiation. In addition radiation monitoring was not uniform, in that not all workers were routinely monitored. Selection of workers for monitoring was not necessarily based on worst case scenarios, in other words the exposure data available for subsets of the population may not represent the highest exposures experienced. This facility was involved in large part in extraction of Polonium 210 for manufacture of atomic weapons Pu-Be neutron initiators but was also involved in research and development activities involving a variety of other radionuclides including: Ra-226, Ac-227, Th-228, Th-232, Th-230, Pa-231, and U-233 as well as extraction and purification of Ra-226, Ac-227, Th-230 and Pa-231. The SC&A consultation report on the NIOSH Site Profile does not inspire confidence in the claimant's that accurate, defensible dose reconstructions are possible. These comments are all referable to section F-1 below as the unmonitored exposure situation at this facility represents a day by day reality and not a discrete "incident" per se.

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 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.

The NIOSH site profile appears to make many assumptions regarding exposure assessment which each carry with them a degree of uncertainty and potential error. Of note are the reported high temperature processing procedures involving both Plutonium, Thorium and Polonium isotopes. Even for those for whom any exposure data is available, it appears that neither biomonitoring nor environmental monitoring data are sufficient for individual dose characterizations without several assumptions and extrapolations regarding bioavailability, absorption and excretion. In addition any application of more recent exposure data to older situations is quite likely to underestimate exposures given the progressive improvements in engineering controls and changes in production technologies. In this same vein we believe that the health physics technologies and administrative procedures used for exposure assessment in the earliest years were neither accurate nor consistent. Deficiencies in dose estimations are expected and too many assumptions and extrapolations are being made for scientific integrity.

- F.2 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.

The Mound facility reportedly sent 458 boxes of plant records to Los Alamos in 1993. these records were found to be contaminated with radiation and buried at Los Alamos as a health hazard. One cannot but guess what these records contained. The most significant fact being that these records were considered a health threat from uptake of radioactive particulate. This does not speak well for the historical hygiene at the facility

Part F is continued on the following page.

Name or Social Security Number of First Petitioner: _____

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. One or more of three persons may sign the petition.

Signature _____

5-23-2007
Date

Signature _____

May 28, 2007
Date

Signature *0* _____

6-1-07
Date

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: _____

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 0920-0639. 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.

Name or Social Security Number of First Petitioner: _____

Continuation Page — Photocopy and complete as necessary.

The following is rough transcript of a history from
- was hired on at Mounds around the same day as her sister in 9-25 1956- until 1986, 30
years. developed CML and died around Christmas, 2006. They all worked in several
buildings. A cousin also worked there and got breast cancer. said they wore robes,
special shoes, caps over hair, various types of gloves, rubber, plastic and cotton, occasionally a
mask for mixing MOCA. They always wore a picture identification badge but did not always
wear radiation badges. Sometimes you would wear a radiation badge almost all day but usually
only short parts of the day. She would have to shower repeatedly. She worked with Beryllium on
several occasions including various laboratories and in the early years production of parts.
They would travel from building to building as they bid for different jobs.
A bldg was administration, B was biology, C was cafeteria, D was decontamination a hot bldg.
lots of water that they tried to wash the facility with and contaminated the regional aquifer, had
to remove tons of dirt. R building was radioactive and hot. A young man got so exposed to
radiation in the T building that he died in the medical facility. The T building was far
underground. After three years in the T building, sometime in the 1970's, she had to be taken
out because of persistent contamination of her hair. She had to wear rubber gloves at home and
couldn't touch or sleep with her husband for about two or three weeks until the radiation cleared
from her right arm. The production areas appeared spotless, very little dust. The areas in which
metallurgy was done were the dirtiest areas but these were mostly staffed by men.
The chemical storage areas were some of the most dangerous areas.
Made heads for the triggers or detonators of A bombs, soldered two little silver spots and took a
microscopic gold wire on the detonators, and test fired these.
She worked with beryllium off and on but did not personally sand, grind or polish such parts.
She worked quite a bit with an explosive white powder which they would weigh out with
stainless steel spoons.
Some supervisors didn't tell workers what they worked with
Workers had blue books and classified red books that told workers what they did
There were times when not wearing a badge but her supervisor was
Also the men didn't seem to be as careful as the women were, they were braver.

Attach to Form B if necessary.

Name or Social Security Number of First Petitioner:

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
Appendix — Petitioner 2

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 right, benefit, or privilege to which you may be entitled.

Use this Appendix for Petitioner 2.

This appendix form is to be used as needed. Petitioner 2, or his or her representative, should complete the parts applicable to him or her.

Refer to the General Instructions on completing petitioner information for Parts A, B, or C.

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.

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

If you are:	<input checked="" type="checkbox"/> An Energy Employee (current or former),	Start at C
	<input type="checkbox"/> A Survivor (of a former Energy Employee),	Start at B
	<input type="checkbox"/> A Representative (of a current or former Energy Employee),	Start at A

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:

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.

Name or 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.

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: NA

C.7 Employment Information Related to Petition:

C.7a Employee Number (if known):

C.7b Dates of Employment: Start Sept. 29, 1956 End May 1, 1986

C.7c Employer Name: Monsanto Research Corp.

C.7d Work Site Location: Mound Plant
Miamisburg Ohio 45342

C.7e Supervisor's Name:

Sign Part G of the original petition.

Name or Social Security Number of First Petitioner:

The following is rough transcript of a history from _____ sister of _____
_____ was hired on at Mounds around the same day as her sister in 9-25 1956- until 1986, 30
years. Mary developed CML and died around Christmas, 2006. They all worked in several
buildings. A cousin _____ also worked there and got breast cancer. _____ said they wore robes,
special shoes, caps over hair, various types of gloves, rubber, plastic and cotton, occasionally a
mask for mixing MOCA. They always wore a picture identification badge but did not always
wear radiation badges. Sometimes you would wear a radiation badge almost all day but usually
only short parts of the day. She would have to shower repeatedly. She worked with Beryllium on
several occasions including various laboratories and in the early years production of parts.
They would travel from building to building as they bid for different jobs.
A bldg was administration, B was biology, C was cafeteria, D was decontamination a hot bldg.
lots of water that they tried to wash the facility with and contaminated the regional aquifer, had
to remove tons of dirt. R building was radioactive and hot. A young man got so exposed to
radiation in the T building that he died in the medical facility. The T building was far
underground. After three years in the T building, sometime in the 1970's, she had to be taken
out because of persistent contamination of her hair. She had to wear rubber gloves at home and
couldn't touch or sleep with her husband for about two or three weeks until the radiation cleared
from her right arm. The production areas appeared spotless, very little dust. The areas in which
metallurgy was done were the dirtiest areas but these were mostly staffed by men.
The chemical storage areas were some of the most dangerous areas.
Made heads for the triggers or detonators of A bombs, soldered two little silver spots and took a
microscopic gold wire on the detonators, and test fired these.
She worked with beryllium off and on but did not personally sand, grind or polish such parts.
She worked quite a bit with an explosive white powder which they would weigh out with
stainless steel spoons.
Some supervisors didn't tell workers what they worked with
Workers had blue books and classified red books that told workers what they did
There were times when _____ y was not wearing a badge but her supervisor was
Also the men didn't seem to be as careful as the women were, they were braver.

Attach to Form B if necessary

Name or Social Security Number of First Petitioner: _____

Special Exposure Cohort Petition — Form B

OMB Number: 0920-0639

Expires: 05/31/2007

Appendix — Petitioner 3

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 right, benefit, or privilege to which you may be entitled.

Use this Appendix for Petitioner 3.

This appendix form is to be used as needed. Petitioner 3, or his or her representative, should complete the parts applicable to him or her.

Refer to the General Instructions on completing petitioner information for Parts A, B, or C.

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.

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

If you are:	<input checked="" type="checkbox"/> An Energy Employee (current or former),	Start at C
	<input type="checkbox"/> A Survivor (of a former Energy Employee),	Start at B
	<input type="checkbox"/> A Representative (of a current or former Energy Employee),	Start at A

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:**
- 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.

Name or Social Security Number of First Petitioner: _____

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

Appendix — Petitioner 3

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:

<input type="checkbox"/> Spouse	<input type="checkbox"/> Son/Daughter	<input type="checkbox"/> Parent
<input type="checkbox"/> Grandparent	<input type="checkbox"/> Grandchild	

Go to Part C.

C Employee Information — Complete Section C

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: NA

C.7 Employment Information Related to Petition:

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

C.7b Dates of Employment: Start April 30, 1956 End Jan. 1, 1987

C.7c Employer Name: Monsanto Research Corp

C.7d Work Site Location: Mound Lab
Miamisburg, Ohio 45342

C.7e Supervisor's Name: _____

Sign Part G of the original petition.

Name or Social Security Number of First Petitioner: _____

Special Exposure Cohort Petition — Form B

Appendix — Continuation Page

Pages: A Photocopy and (complete) is necessary.

The following is rough transcript of a history from
was hired on at Mounds around the same day as her sister in 9-25 1956- until 1986, 30
years. . . . developed CML and died around Christmas, 2006. They all worked in several
buildings. A cousin also worked there and got breast cancer . . . they wore robes,
special shoes, caps over hair, various types of gloves, rubber, plastic and cotton, occasionally a
mask for mixing MOCA. They always wore a picture identification badge but did not always
wear radiation badges. Sometimes you would wear a radiation badge almost all day but usually
only short parts of the day. She would have to shower repeatedly. She worked with Beryllium on
several occasions including various laboratories and in the early years production of parts.
They would travel from building to building as they bid for different jobs.
A bldg was administration, B was biology, C was cafeteria, D was decontamination a hot bldg.
lots of water that they tried to wash the facility with and contaminated the regional aquifer, had
to remove tons of dirt. R building was radioactive and hot. A young man got so exposed to
radiation in the T building that he died in the medical facility. The T building was far
underground. After three years in the T building, sometime in the 1970's, she had to be taken
out because of persistent contamination of her hair. She had to wear rubber gloves at home and
couldn't touch or sleep with . . . husband for about two or three weeks until the radiation cleared
from her right arm. The production areas appeared spotless, very little dust. The areas in which
metallurgy was done were the dirtiest areas but these were mostly staffed by men.
The chemical storage areas were some of the most dangerous areas.
Made heads for the triggers or detonators of A bombs, soldered two little silver spots and took a
microscopic gold wire on the detonators, and test fired these.
She worked with beryllium off and on but did not personally sand, grind or polish such parts.
She worked quite a bit with an explosive white powder which they would weigh out with
stainless steel spoons.
Some supervisors didn't tell workers what they worked with
Workers had blue books and classified red books that told workers what they did
There were times when . . . was not wearing a badge but her supervisor was
Also the men didn't seem to be as careful as the women were, they were braver.

Attach to Form B if necessary.

Name or Social Security Number of First Petitioner: _____

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

Page 3 of 7

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

Name or Social Security Number of First Petitioner: _____

Tab D

NIOSH SEC Evaluation Report

SEC Petition Evaluation Report
Petition SEC-00090

Report Rev #: 0

Report Submittal Date: December 19, 2007

Subject Expert(s):	Karin Jessen, Tim Adler, James Berger, Don Stewart
Site Expert(s):	Elizabeth Brackett

Petition Administrative Summary

Petition Under Evaluation

Petition #	Petition Type	Petition B Qualification Date	DOE/AWE Facility Name
SEC-00090	83.13	August 17, 2007	Mound Plant

Petitioner Class Definition

All employees who worked in all areas within the boundaries at the Mound Plant from February 1949 – present.

Proposed Class Definition

All employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors and subcontractors, who were monitored or should have been monitored, for internal Ra-Ac-Th exposures while working in all areas of the Mound site for a number of work days aggregating at least 250 work days from October 1, 1949 through February 28, 1959, or in combination with work days within the parameters established for one or more other classes of employees in the SEC.

Related Petition Summary Information

SEC Petition Tracking #(s)	Petition Type	DOE/AWE Facility Name	Petition Status
SEC-00091	83.13	Mound Plant	Merged with SEC-00090

Related Evaluation Report Information

Report Title	DOE/AWE Facility Name
None	

ORAU Lead Technical Evaluator: Karin Jessen

ORAU Review Completed By: Daniel H. Stempfley

Peer Review Completed By:	[Signature on file] <i>Brant Ullsh</i>	12/19/2007 <i>Date</i>
SEC Petition Evaluation Reviewed By:	[Signature on file] <i>Stuart Hinnefeld for J. W. Neton</i>	12/19/2007 <i>Date</i>
SEC Evaluation Approved By:	[Signature on file] <i>Larry Elliott</i>	12/20/2007 <i>Date</i>

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Evaluation Report Summary: SEC-00090 Mound Plant

This evaluation report by the National Institute for Occupational Safety and Health (NIOSH) addresses a class of employees proposed for addition to the Special Exposure Cohort (SEC) per the *Energy Employees Occupational Illness Compensation Program Act of 2000*, as amended, 42 U.S.C. § 7384 *et seq.* (EEOICPA) and 42 C.F.R. pt. 83, *Procedures for Designating Classes of Employees as Members of the Special Exposure Cohort under the Energy Employees Occupational Illness Compensation Program Act of 2000*.

Petitioner-Requested Class Definition

Petition SEC-00090, qualified on August 17, 2007, requested that NIOSH consider the following class: *All employees who worked in all areas within the boundaries at the Mound Plant from February 1949 – present.*

NIOSH-Proposed Class Definition

Based on its research, NIOSH reduced the petitioner-requested class to define a single class of employees for which NIOSH cannot estimate radiation doses with sufficient accuracy. The NIOSH-proposed class includes all employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors and subcontractors, who were monitored, or should have been monitored, for internal Ra-Ac-Th exposures while working in all areas of the Mound site for a number of work days aggregating at least 250 work days from October 1, 1949 through February 28, 1959, or in combination with work days within the parameters established for one or more other classes of employees in the SEC.

Feasibility of Dose Reconstruction

NIOSH cannot estimate internal Ra-Ac-Th exposures from the arrival of K-65 sludge in October 1949 through February 28, 1959, when the related area of work was decontaminated and decommissioned and sufficient monitoring was in place. With exception of this class, per EEOICPA and 42 C.F.R. § 83.13(c)(1), NIOSH has established that it has access to sufficient information to: (1) estimate the maximum radiation dose, for every type of cancer for which radiation doses are reconstructed, that could have been incurred in plausible circumstances by any member of the class; or (2) estimate radiation doses of members of the class more precisely than an estimate of maximum dose. Information available from the site profile and additional resources is sufficient to document or estimate the maximum internal and external potential exposure to members of the proposed class under plausible circumstances during the specified period.

Health Endangerment Determination

Per EEOICPA and 42 C.F.R. § 83.13(c)(3), a health endangerment determination is required because NIOSH has determined that it does not have sufficient information to estimate internal Ra-Ac-Th exposures for the members of the proposed class.

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SEC Petition Evaluation Report for SEC-00090

1.0 Purpose and Scope

This report evaluates the feasibility of reconstructing doses for all employees who worked in all areas at the Mound Plant from February 1, 1949 through August 17, 2007. It provides information and analyses germane to considering a petition for adding a class of employees to the congressionally-created SEC.

This report does not make any determinations concerning the feasibility of dose reconstruction that necessarily apply to any individual energy employee who might require a dose reconstruction from NIOSH. This report also does not contain the final determination as to whether the proposed class will be added to the SEC (see Section 2.0).

This evaluation was conducted in accordance with the requirements of EEOICPA, 42 C.F.R. pt. 83, and the guidance contained in the Office of Compensation Analysis and Support's (OCAS) *Internal Procedures for the Evaluation of Special Exposure Cohort Petitions*, OCAS-PR-004.

2.0 Introduction

Both EEOICPA and 42 C.F.R. pt. 83 require NIOSH to evaluate qualified petitions requesting that the Department of Health and Human Services (HHS) add a class of employees to the SEC. The evaluation is intended to provide a fair, science-based determination of whether it is feasible to estimate with sufficient accuracy the radiation doses of the class of employees through NIOSH dose reconstructions.¹

42 C.F.R. § 83.13(c)(1) states: *Radiation doses can be estimated with sufficient accuracy if NIOSH has established that it has access to sufficient information to estimate the maximum radiation dose, for every type of cancer for which radiation doses are reconstructed, that could have been incurred in plausible circumstances by any member of the class, or if NIOSH has established that it has access to sufficient information to estimate the radiation doses of members of the class more precisely than an estimate of the maximum radiation dose.*

Under 42 C.F.R. § 83.13(c)(3), if it is not feasible to estimate with sufficient accuracy radiation doses for members of the class, NIOSH must also then determine whether or not there is a reasonable likelihood that such radiation doses may have endangered the health of members of the class. The regulation requires NIOSH to assume that any duration of unprotected exposure may have endangered the health of members of a class when it has been established that the class may have been exposed to radiation during a discrete incident likely to have involved levels of exposure similarly high to those occurring during nuclear criticality incidents. If the occurrence of such an exceptionally high-level exposure has not been established, then NIOSH is required to specify that health was endangered for

¹ NIOSH dose reconstructions under EEOICPA are performed using the methods promulgated under 42 C.F.R. pt. 82 and the detailed implementation guidelines available at <http://www.cdc.gov/niosh/ocas>.

those workers who were employed for at least 250 aggregated work days within the parameters established for the class or in combination with work days within the parameters established for other SEC classes (excluding aggregate work day requirements).

NIOSH is required to document its evaluation in a report, and to do so, relies upon both its own dose reconstruction expertise as well as technical support from its contractor, Oak Ridge Associated Universities (ORAU). Once completed, NIOSH provides the report to both the petitioner(s) and to the Advisory Board on Radiation and Worker Health (Board). The Board will consider the NIOSH evaluation report, together with the petition, petitioner(s) comments, and other information the Board considers appropriate, in order to make recommendations to the Secretary of HHS on whether or not to add one or more classes of employees to the SEC. Once NIOSH has received and considered the advice of the Board, the Director of NIOSH will propose a decision on behalf of HHS. The Secretary of HHS will make the final decision, taking into account the NIOSH evaluation, the advice of the Board, and the proposed decision issued by NIOSH. As part of this decision process, petitioners may seek a review of certain types of final decisions issued by the Secretary of HHS.²

3.0 Petitioner-Requested Class/Basis & NIOSH-Proposed Class/Basis

Two petitions associated with the Mound Site requested that NIOSH consider classes for addition to the SEC:

1. Petition SEC-00090, qualified on August 17, 2007, requested the following class: *All employees who worked in all areas within the boundaries at the Mound Plant from February 1949 – present.*
2. Petition SEC-00091, qualified on September 24, 2007, requested the following class: *All employees who worked within the boundaries of the Mound Plant from February 1, 1949 through December 31, 1970.*

The petitioners provided information and affidavit statements in support of the petitioners' belief that accurate dose reconstruction over time is impossible for the Mound workers in question. The SEC-00090 petitioner claimed that personal monitoring records are buried at Los Alamos National Laboratory (LANL) and at the Nevada Test Site (NTS). NIOSH is aware that Mound records were buried at LANL. NIOSH determined that this concern was sufficient to qualify the petition. During the evaluation of this petition, NIOSH determined that the applicable buried records have been recovered or are otherwise accounted for (based on information NIOSH has collected, including an interview with a former Mound Records Manager).

The information and statements provided by the petitioner qualified the petition for further consideration by NIOSH, the Board, and HHS. Petition SEC-00091 was qualified based on its timeframe being completely encompassed by Petition SEC-00090. Consequently, NIOSH merged the Petition SEC-00091 into Petition SEC-00090. This report, SEC-00090, evaluates the feasibility of reconstructing doses for all employees who worked in all areas at the Mound

² See 42 C.F.R. pt. 83 for a full description of the procedures summarized here. Additional internal procedures are available at <http://www.cdc.gov/niosh/ocas>.

Plant from February 1, 1949 through August 17, 2007. The details of the petition basis are addressed in Section 7.4.

Based on its research, NIOSH reduced the petitioner-requested class to define a single class of employees for which NIOSH cannot estimate radiation doses with sufficient accuracy. The NIOSH-proposed class includes all Mound employees who were monitored, or should have been monitored, for internal Ra-Ac-Th exposures from October 1, 1949 through February 28, 1959. The petitioner-requested class was reduced as a result of the feasibility evaluation documented in Section 7.0. The petitioner-requested class was reduced because, except for the class above, NIOSH has obtained sufficient information to reconstruct doses for the entire evaluation period. NIOSH cannot estimate internal Ra-Ac-Th exposures from the arrival of K-65 sludge in October 1949 through February 28, 1959, when the related area of work was decontaminated and decommissioned and sufficient monitoring was in place.

4.0 Data Sources Reviewed by NIOSH

NIOSH identified and reviewed numerous data sources to determine information relevant to determining the feasibility of dose reconstruction for the class of employees proposed for this petition. This included determining the availability of information on personal monitoring, area monitoring, industrial processes, and radiation source materials. The following subsections summarize the data sources identified and reviewed by NIOSH.

4.1 Site Profile Technical Basis Documents (TBDs)

A Site Profile provides specific information concerning the documentation of historical practices at the specified site. Dose reconstructors can use the Site Profile to evaluate internal and external dosimetry data for monitored and unmonitored workers, and to supplement, or substitute for, individual monitoring data. A Site Profile consists of an Introduction and five Technical Basis Documents (TBDs) that provide process history information, information on personal and area monitoring, radiation source descriptions, and references to primary documents relevant to the radiological operations at the site. The Site Profile for a small site may consist of a single document. As part of NIOSH's evaluation detailed herein, it examined the following TBDs for insights into Mound Plant operations or related topics/operations at other sites:

- ORAUT-TKBS-0003, *Technical Basis Document for the Savannah River Site*, Rev. 01, Oak Ridge Associated Universities; August 21, 2003; SRDB Ref ID: 20178
- *TBD for the Mound Site – Introduction*, ORAUT-TKBS-0016-1; Rev. 00; September 9, 2004; SRDB Ref ID: 19784
- *TBD for the Mound Site – Site Description*, ORAUT-TKBS-0016-2; Rev. 00 PC-1; July 7, 2006; SRDB Ref ID: 30057
- *TBD for the Mound Site – Occupational Medical Dose*, ORAUT-TKBS-0016-3, Rev. 01 PC-2; March 31, 2006; SRDB Ref ID: 30059

- *TBD for the Mound Site – Occupational Environmental Dose*, ORAUT-TKBS-0016-4; Rev. 00; October 6, 2004; SRDB Ref ID: 19789
- *TBD for the Mound Site – Occupational Internal Dosimetry*, ORAUT-TKBS-0016-5; Rev. 00; September 9, 2004; SRDB Ref ID: 19790
- *TBD for the Mound Site – Occupational External Dosimetry*, ORAUT-TKBS-0016-6; Rev. 00; August 11, 2004; SRDB Ref ID: 19791

4.2 ORAU Technical Information Bulletins (OTIBs) and Procedures

An ORAU Technical Information Bulletin (OTIB) is a general working document that provides guidance for preparing dose reconstructions at particular sites or categories of sites. An ORAU Procedure provides specific requirements and guidance regarding EEOICPA project-level activities, including preparation of dose reconstructions at particular sites or categories of sites. NIOSH reviewed the following OTIBs and procedures as part of its evaluation:

- OTIB: *Maximum Internal Dose Estimates for Certain DOE Complex Claims*, ORAUT-OTIB-0002, Rev. 02; February 7, 2007; SRDB Ref ID: 29947
- OTIB: *Dose Reconstruction from Occupationally Related Diagnostic X-Ray Procedures*, ORAUT-OTIB-0006, Rev. 03 PC-1; December 21, 2005; SRDB Ref ID: 20220
- OTIB: *Interpretation of Dosimetry Data for Assignment of Shallow Dose*, ORAUT-OTIB-0017, Rev. 01; October 11, 2005; SRDB Ref ID: 19434
- OTIB: *Internal Dose Overestimates for Facilities with Air Sampling Programs*, ORAUT-OTIB-0018, Rev. 01; August 9, 2005; SRDB Ref ID: 19436
- OTIB: *Estimating Doses for Plutonium Strongly Retained in the Lung*, ORAUT-OTIB-0049, Rev. 00; February 6, 2007; SRDB Ref ID: 29975
- OTIB: *Internal Dose Reconstruction*, ORAUT-OTIB-0060, Rev. 00, February 6, 2007, SRDB Ref ID: 29984
- OTIB: *Internal Dosimetry Coworker Data for the Mound Site*, ORAUT-OTIB-0061, Rev. 00; June 22, 2007; SRDB Ref ID: 32524
- OTIB: *Calculation of Dose from Intakes of Special Tritium Compounds*, ORAUT-OTIB-0066, Rev. 00; April 26, 2007; SRDB Ref ID: 31421
- PROC: *External Dose Reconstruction*, ORAUT-PROC-0006, Rev. 01; June 5, 2006; SRDB Ref ID: 29985

- PROC: *Occupational Onsite Ambient Dose Reconstruction for DOE Sites*, ORAUT-PROC-0060, Rev. 01; June 28, 2006; SRDB Ref ID: 29986
- PROC: *Occupational X-Ray Dose Reconstruction for DOE Sites*, ORAUT-PROC-0061, Rev. 01; July 21, 2006; SRDB Ref ID: 29987

4.3 Facility Employees and Experts

To obtain additional information, NIOSH interviewed 21 former Mound employees. In-person or telephone conversations were held with 20 of the former employees. Questions were developed and refined for each conversation to correspond to the former employee's job title and work experience. For one interviewee, a questionnaire was sent and returned by e-mail.

Interviewee selection was based on individual availability, information regarding job description, and potential knowledge of Mound working conditions during the period of the proposed class. The interviews ultimately included employees representing a wide range of Mound experiences, including records management, health physics, internal and external dosimetry, knowledge of site operations, and radiological incidents. Information obtained during the interviews contributed to the general knowledge of Mound conditions and monitoring practices and included information regarding records from the T building that were buried at the Los Alamos National Laboratory.

Several interviews were conducted in August 2007, but the majority was conducted during late October and early November 2007. In general, the information obtained was consistent with that found in NIOSH documents regarding the Mound Site.

- SEC ER-related Interview by ORAU Team with Chief Counsel; October 30, 2007; SRDB Ref ID: 36860
- SEC ER-related Interview by ORAU Team with Assistant HP; October 29, 2007; SRDB Ref ID: 36862
- SEC ER-related Interview by ORAU Team with Records Manager; August 9, 2007; SRDB Ref ID: 35950
- SEC ER-related Interview by ORAU Team with Records Manager November 8, 2007; SRDB Ref ID: 36867
- SEC ER-related Interview by ORAU Team with Research Chemist; October 30, 2007; SRDB Ref ID: 36866
- SEC ER-related Interview by ORAU Team with Custodian, RCT; October 29, 2007; SRDB Ref ID: 36869
- SEC ER-related Interview by ORAU Team with Research Chemist, Group Leader; November 6, 2007; SRDB Ref ID: 36870

- SEC ER-related Interview by ORAU Team with Technical Specialist, Manager of Internal Dosimetry; November 5, 2007 and December 7, 2007; SRDB Ref ID: 36873
- SEC ER-related Interview by ORAU Team with Laborer-then Material Handler-then Electrician; November 6, 2007; SRDB Ref ID: 36875
- SEC ER-related Interview by ORAU Team with Senior Research Specialist; November 9, 2007; SRDB Ref ID: 36876
- SEC ER-related Interview by ORAU Team with Senior Health Physicist; September 9, 2007; SRDB Ref ID: 35953
- SEC ER-related Interview by ORAU Team with member of Nuclear Physics Group; November 8, 2007; SRDB Ref ID: 36878
- SEC ER-related Interview by ORAU Team with Subject Expert about Mound Records Disposal; August 16, 2007; SRDB Ref ID: 35952
- SEC ER-related Interview by ORAU Team with Decontamination Worker-then RCT; November 6, 2007; SRDB Ref ID: 36934
- SEC ER-related Interview by ORAU Team with Electrician and Union Official; November 6, 2007; SRDB Ref ID: 36879
- SEC ER-related Interview by ORAU Team with Internal Dosimetrist; October 31, 2007; SRDB Ref ID: 36881
- SEC ER-related Interview by ORAU Team with Custodian-then D&D Worker-then Health Specialist; November 6, 2007; SRDB Ref ID: 36882
- SEC ER-related Interview by ORAU Team with Senior Health Physicist-then HP Specialist-then Manager of Radon Group; Date not identified; SRDB Ref ID: 36883
- SEC ER-related Interview by ORAU Team with Radiological Engineer-then Supervisor for Health Protection; October 23, 2007; SRDB Ref ID: 36884
- SEC ER-related Interview by ORAU Team with Member of HP Group-then HP Supervisor-then Bioassay Lab Manager; October 29, 2007; SRDB Ref ID: 36877
- SEC ER-related Interview by ORAU Team with Internal Dosimetrist- then Dose Reconstruction Manager; October 24, 2007; SRDB Ref ID: 36886
- SEC ER-related Interview by ORAU Team with Operating Chemist-Internal Dosimetry Supervisor-Environmental Monitoring-Analytical Development-Nuclear Operations-Research Specialist; October 30, 2007; SRDB Ref ID: 36887

4.4 Previous Dose Reconstructions

NIOSH reviewed its NIOSH OCAS Claims Tracking System (NOCTS) to locate EEOICPA-related dose reconstructions that might provide information relevant to the petition evaluation. Table 4-1 summarizes the results of this review for the period of February 1, 1949 through August 17, 2007. (NOCTS data available as of December 6, 2007)

Table 4-1: No. of Mound Site Claims Submitted Under the Dose Reconstruction Rule	
Description	Totals
Total number of claims submitted for dose reconstruction	491*
Total number of claims submitted for energy employees who meet the proposed class definition criteria (February 1, 1949 through August 17, 2007)	485*
Number of dose reconstructions completed for energy employees who meet the proposed class definition criteria	348
Number of claims for which internal dosimetry records were obtained for the identified years in the proposed class definition	420
Number of claims for which external dosimetry records were obtained for the identified years in the proposed class definition	430
Number of claims for which some internal and some external records were obtained for the identified years in the proposed class definition.	412

* Out of a total 485 claims, five have not yet received a dosimetry response from the site; therefore, we are assuming 480 total submitted claims.

There are 485 Mound claims with some employment between the years of 1949 and 2007. However, five claims have not yet received a dosimetry response from the site; therefore, only the 480 claims that have received a dosimetry response from the site were reviewed for this evaluation. NIOSH reviewed each claim to determine whether internal and/or external personal monitoring records could be obtained for the employee. As indicated in Table 4-1, NIOSH has been able to obtain internal monitoring data for the majority of the claims that met the proposed class definition. Of the total number of claims submitted, 420 (88%) have internal monitoring data and 430 (90%) have external monitoring data.

The dose reconstruction claimant interviews (CATI) conducted with the claimants provide some detailed information regarding work locations, hours worked, incidents, and hazards encountered. The interviews also identified conditions for which there would have been potential for either internal or external exposures.

4.5 NIOSH Site Research Database

NIOSH also examined its Site Research Database to locate documents supporting the evaluation of the proposed class. There were 879 documents in this database that were identified as pertaining to Mound. These documents were evaluated for their relevance to this petition. The documents include historical background on external and internal dosimetry programs and evaluations; annual, semi-annual, and quarterly technical summary reports; annual environmental reports; annual reviews of the Mound Plant; evaluations of specific buildings; site surveys; and facility and process descriptions.

4.6 Other Technical Sources

In addition to its own Site Research Database, NIOSH also examined the following databases and records repository:

- PORECON (Polonium Reconstruction) Database: Mound-owned database that contains bioassay data
- PURECON (Plutonium Reconstruction) Database: Mound-owned database that contains bioassay data
- MORE (Mound Occupational Radiological Exposure) Records Center where original employee-specific health physics records were filed by employee name
- MESH (Mound Environmental, Safety, and Health) Database: Mound-owned database that contains dosimetry (internal and external) results, medical information, and employment history.
- Pre-1989 Dose Assessment Project: MJW Corp., as a Mound subcontractor, conducted a dose reconstruction project on internal doses received prior to 1989. The dose reconstruction efforts resulted in two reports, Phase I and Phase II, which are owned by Mound.

4.7 Documentation and/or Affidavits Provided by Petitioners

In qualifying and evaluating the petition, NIOSH reviewed the following documents submitted by the petitioners:

Petition SEC-00090:

- Copy of letter presented and submitted to the official record on May 15, 2007 to the U.S. Department of Labor, Ohio; OSA Ref ID: 103188 (6-4-07); 103455 (7-20-07)
- Copy of Dayton Daily News (Ohio) article, *Report Says Ill Mound Workers Treated Unfairly*; OSA Ref ID: 103188 (6-4-07); 103455 (7-20-07)
- Copy of Dayton Daily News (Ohio) article, *Mound Plant Records Buried in New Mexico*; OSA Ref ID: 103188 (6-4-07); 103455 (7-20-07)

- *Affidavit from petitioner and her representative*; OSA Ref ID: 103513 (7-30-07)
- *Affidavit from former employee*; OSA Ref ID: 103513 (7-30-07)
- *Affidavit from former employee*; OSA Ref ID: 103554 (8-13-07)
- *Affidavit from petitioner representative, plus a copy of the letter received from the U.S. Department of Labor dated Jun 7, 2007 in regard to her dose reconstruction.* This letter indicates that the “prior dose reconstruction” may be invalid for not only the petitioner but for other Mound Plant employees; OSA Ref ID: 103554 (8-13-07)

Petition SEC-00091:

- *Form B petition*; OSA Ref ID: 103209, (6-14-07)
- No affidavits were associated with this petition.

5.0 Radiological Operations Relevant to the Proposed Class

The following subsections summarize both radiological operations at the Mound Plant from February 1, 1949 through August 17, 2007 and the information available to NIOSH to characterize particular processes and radioactive source materials. From available sources NIOSH has gathered process and source descriptions, information regarding the identity and quantities of each radionuclide of concern, and information describing both processes through which radiation exposures may have occurred and the physical environment in which they may have occurred. The information included within this evaluation report is intended only to be a summary of the available information.

NOTE: Throughout this evaluation report, the term “Mound” will be employed to refer to all historical phases of, and successive names for, the Mound Site. Mound was operated by several different companies. Table 5-1 shows the operational chronology. These companies contracted to the U.S. Atomic Energy Commission (1948-1974), the U.S. Energy Research and Development Administration (1974-1977), or the U.S. Department of Energy (1977-present).

Table 5-1: Mound Plant Operational Chronology	
Company*	Years
Monsanto Chemical Company	1948-1961
Monsanto Research Corporation	1961-1988
EG&G Mound Applied Technologies, Inc	1988-1997
Babcock and Wilcox of Ohio, Inc.	1997-2002
CH2M Hill Mound, Inc.	2003-2006
S. M. Stoller Corporation (DOE Legacy Management)	2003-present
Accelerated Remediation Company (aRc): OU-1 Landfill and PRS-441 Rail Yard remediation	2006-present

* The above information is from the *Mound Records Transfer History* (Long, 2007)

5.1 Mound Plant and Process Descriptions

The Miamisburg Closure Project (MCP), as it is currently called, has also been known as the Miamisburg Environmental Management Project (MEMP), the Mound Site, and formerly, the Mound Laboratory, Plant or Facility. The site took the "Mound" name from a nearby Native American burial mound. The 306-acre facility occupied a hill in the center of Miamisburg, Ohio.

Mound was the nation's first postwar U.S. Atomic Energy Commission (AEC) site to be constructed. It was established to consolidate and continue the polonium work conducted at the Dayton Project for the Manhattan Project. The Dayton Project was operated by Monsanto Chemical Company from January 1, 1943 to December 31, 1949. Several Dayton units became part of the Mound facility. The Dayton Site's primary activity was to produce Po-210 to fabricate atomic warhead initiators. Dayton processes removed polonium as a contributor in the uranium-238 series or from neutron-irradiated bismuth. (For detailed information on the Dayton Project facilities and their activities, see the Mound site description in ORAUT-TKBS-0016-2.) Energy employees who worked for Monsanto on the Dayton Project are covered in SEC Petition Evaluation Report SEC-00049.

Construction of the Mound Plant began in 1946, with polonium processing becoming operational in February 1949. There were originally 14 buildings with 360,000 square feet of space. Mound went on to play an important role in research and development, manufacture of weapons, and evaluation and maintenance of explosive components for the nuclear defense stockpiles. Other work there included tritium recovery, isotope separations methods, development and production of heat sources in support of space programs, support of the fossil fuels program, and a variety of nuclear materials processing. Radioisotopes of uranium and thorium were studied until 1985. At that time, the DOE discontinued or transferred the projects to other facilities.

At Mound, the narrowly-focused polonium production work expanded to include the development and production of weapons components using Pu-238. Mound's main focus was to support DOE weapons and non-weapons programs, especially chemical explosives and nuclear technology. One of its principal missions was to research, develop, and manufacture non-nuclear explosive components for nuclear weapons that were then assembled at other sites.

Much of Mound's Cold War work involved production of the polonium-beryllium (Po-Be) initiators used in early atomic weapons, and the research and manufacture of radionuclides. In the 1950s, the facility began to manufacture a variety of nuclear weapons parts, including cable assemblies, explosive detonators, and electronic firing sets. Mound work evolved to include stable isotope separation, fossil fuels research, development of radioisotope thermoelectric generators (RTGs) for providing electrical power for space exploration, and other non-nuclear research and development.

Early Mound programs investigated the chemical and metallurgical properties of Po-210 and its applications. Research and development included the fabrication of neutron and alpha sources for weapons, and weapons use. Po-210 production declined in the 1960s until it was phased out in 1971.

Developing, producing, and providing surveillance of detonators for military applications began in 1957. Explosive timers were developed in 1959, and manufacture of timers began in 1963. Ferroelectric transducers and firing set component development and manufacture began in 1962.

Tritium-handling technologies began in the mid-1950s in support of weapons and non-weapons programs. Tritium was recovered for reuse in weapons. Metal tritides were used at Mound primarily to trap H-3 using uranium tritides. In addition, research was conducted on metal tritides. Tritium targets might also have been processed.

Other major Mound operations included:

- Manufacture of enriched stable isotopes for medical, industrial, and general research
- Development and manufacture of chemical heat sources
- Recovery and purification of tritium from waste generated by Mound and other DOE sites
- Development of radioisotope heat sources used by the National Aeronautics and Space Administration and other programs
- Research and development of chemical explosives and pyrotechnics, adhesives, plastics, and elastomers for the nuclear weapons program
- Research and development of thermonuclear energy fuel systems
- Research and development of the joining of exotic metals
- Development of instrumentation for the nuclear safeguard program
- Research and development of separation of gases and energy conversion systems
- Research and development of technologies for radioactive waste management

Table 5-2 lists the significant Mound Laboratory Programs and Events.

Table 5-2: Chronology of Significant Mound Laboratory Programs and Events (Table 5-2 spans three pages)	
Year	Activity
1943	Planning begins for the Dayton facilities.
10-44	Polonium operations begin at Unit III
1946	Mound Laboratory planning started.
1948	Mound Laboratory occupied.
1949	<ul style="list-style-type: none"> • Polonium operations moved from Dayton Units to Mound Laboratory. • First program separated Ra-226 from barium-rich uranium ore, with pitchblende residue called K-65. • Experimental extraction of Ra-226 from the K-65 was conducted in the R Bldg. In October, Mound received 200 lbs. of K-65 in a single drum. • Study of processes for decontamination of radioactive waste generated by Hanford Pu production reactors. • From 1949-1953, three different types of processing wastes were studied to concentrate constituents such as Cs-137, Ru-106, Sr-90, Zr-93, Co-60, Nb-94, Sb-125, Te-123, Ni-63, rare earth elements, and Pu-239. Bench-scale testing began in the R building.

Table 5-2: Chronology of Significant Mound Laboratory Programs and Events
(Table 5-2 spans three pages)

Year	Activity
1950	<ul style="list-style-type: none"> • Separation of Po-208 and Po-209 from proton (accelerator) irradiation of bismuth. • Separation of Ac-227 from irradiated Ra-226. • Uranyl sulfate – heavy water fuel system research. • Civilian power reactor research involving uranium, Pa-231, and Pu-239; mission ended in 1963.
1951	Small amount of research with Ra-226 in preparation of cave operation in SW building. Involved irradiated Ra-226 and recovery of Ac-227 and Th-228 from Ra-226.
1952	Pilot plant installed in SW building for processing reactor waste. Reactor waste processing areas also included Warehouses 9 and 13, WD, SD, SW, R, and M.
1953	SW Building (tritium handling) constructed with a dirt floor.
1954	<ul style="list-style-type: none"> • Invention of the Po-210-fueled thermoelectric generator. • Initiation of several programs requiring tritium-handling technologies. • Construction of thorium refinery for breeder reactor program (never operated).
1955	<ul style="list-style-type: none"> • Repackaging of 6,000 55-gallon drums containing thorium ore and sludge was on-going through 1966 due to deterioration and failure of the drums. • August 1955: Small research program in R Bldg involving recovery and subsequent purification of Pa-231 from natural sources. • June 1955: Radium Cave operation shut down (Ra-226, Ac-227, Th-228, Ra-223, Ra-224 daughters) • Decontamination and decommissioning ongoing until February 1959.
1956	<ul style="list-style-type: none"> • Completed separation of 1.3 grams of Pa-231 in Building HH. • Weighable quantities of Th-230 (ionium) separated. • Pu-239/Be neutron sources manufactured. • Nuclear weapon detonator development, production, and surveillance; mission ended in 1989.
1959	<ul style="list-style-type: none"> • Pu-239 reactor fuels laboratory operational. • Tritium waste recovery and purification facility operational. • U-233 research involving about ten research personnel • D&D completed for old cave
1960	Pu-238 used in large quantities in production operations. Process areas included the R, SM, and PP Buildings.
1961	Development of Pu-238 heat sources for thermoelectric generators.
1963	Several Po and Gadolinium polinide heat sources containing 100-1000 Ci of Po-210 were encapsulated in refractory metal.
1964	<ul style="list-style-type: none"> • 190 mg of Ac-227 was processed in the new cave area. • Thorium ore and sludge moved to bulk storage in Building 21
1965	Gaseous effluent control system operational in SW Building.
1967	<ul style="list-style-type: none"> • 54,000 Ci of high-purity Po-210 were processed for Mound experimental work and commercial use. • 14.5 kg of Pu-238 were recovered from waste material.
1968	PP Building 38 operational for processing Pu-238.
1969	<ul style="list-style-type: none"> • Waste line break and subsequent contamination of the abandoned Miami-Erie Canal bed with Pu-238. • Began tritium recycling from retired weapon parts. • 3,701 Ci of Po-210 were produced for both internal and external customers. • Six SNAP 27 sources were produced. Each source contained 3735 Ci of Pu-238
10/70 – 6/71	Plutonium inventory was reduced to a minimum level. 22.5 kg of Pu-238 scrap was shipped to SRS for burial.
1972	<ul style="list-style-type: none"> • Tritium effluent control project began. • Non-weapons polonium work terminated.
1973	Pu-238 oxide was processed for four multi-hundred watt (4.2 kg each) and 2 Viking sources (1.2 kg each)
1974	<ul style="list-style-type: none"> • Thorium ore and sludge completely removed from site. • Po-210 decontamination of Technical (T) Building completed.
1975	Pu-238 recovery operations terminated.
1977	Californium Multiplier Neutron Radiography Facility installed.

Table 5-2: Chronology of Significant Mound Laboratory Programs and Events
(Table 5-2 spans three pages)

Year	Activity
1989	Removal of soil contaminated with uranium near Building 34.
1990	Pu-238 decontamination of inactive laboratories in the R Building.
1991	Removal of Pu-238-contaminated waste line connecting the HH Building with the WD facility.
1993	<ul style="list-style-type: none"> • DOE decision to transfer defense mission from Mound. • Pu-238 decontamination of PP Building 38 and Acid Leach Field (Area D).
1994	Demolition of SM Building structure contaminated with Pu-238.
1995-2006	Decontamination and decommissioning of approximately 116 contaminated structures and 400 contaminated land areas
2006	Remediation of final Mound Plant site land areas (OU-1 Landfill, PRS 441 Rail Yard, and sanitary waste treatment system) initiated

5.2 Mound Functional Areas

The following subsections describe the key functional areas of the Mound Plant. The source for most of the information below is ORAUT-TKBS-0016-2, which provides additional information regarding Mound functional areas.

5.2.1 Polonium Research and Production

Polonium research and production activities conducted at the Dayton Laboratory benefited from improved facilities at the Mound site specifically designed for those processes. These included the encapsulation of the process in purpose-designed process equipment with provisions for remote operation. A detailed description of this equipment is included in an unpublished chapter of the book *Polonium* by H. V. Moyer (Mound Po, various dates; Polonium, 1956). The controls used concentration cells to perform worked that had been performed at the Dayton Laboratory in open-faced hoods.

In 1954, Mound began using Po-210 to produce thermoelectric energy. The first RTG was produced in 1958. Po-210 was primarily produced by neutron irradiation of naturally-occurring Bi-209 slugs to produce Bi-210 via a (n, γ) reaction followed by beta decay to Po-210. Prior to 1956, Mound's first primary mission was to manufacture initiators for nuclear weapons. This included the extraction of Po-210 from neutron-irradiated bismuth slugs and beryllium-machining operations. Po-210 was also used in the first Space Nuclear Auxiliary Power (SNAP) program in 1961. Mound polonium research and production was gradually phased out in 1971.

5.2.2 Plutonium-238 Research and Development

Pu-238 research and development activities began at Mound during the mid-1950s. Pu-238 research programs were transferred from Lawrence Livermore National Laboratory to Mound in 1959. The first production of metallic Pu-238 was achieved in the spring of 1960. The research and development (R&D) activities were directed toward the development and production of stable RTGs. More than 500 RTGs were produced for a variety of applications, including electric power generation for satellites, life support systems, spacecraft, pacemakers, and an artificial heart. The first SNAP

provided 2.6 watts of power to the Transit navigation satellite in 1963. Metallic plutonium was initially used in SNAP applications because the devices were designed to disintegrate and burn during reentry. A change in philosophy resulted in the use of plutonium dioxide which was less vulnerable and maintained integrity during reentry.

Reactor fuels research using Pu-239 led to the development of chemically and physically stable microspheres of unique plutonium compounds and alloys using an inductively-coupled plasma torch. These same processes were adapted during the mid-1960s for Pu-238 to produce high-integrity microspheres for heat sources with essentially no transportable or removable activity.

From the early 1960s to the late 1970s, Mound continued to produce both heat sources and complete RTG systems in the SM and PP buildings. Related work with Pu-238 occurred in the R building and Building 50.

5.2.3 Tritium Production

Following some earlier research with small quantities of tritium, production of tritium for nuclear weapon applications began during the mid-1950s. Related activities included tritium enrichment, recovery processes, and control of tritium-contaminated wastes. The tritium recycling and enrichment system had many applications. The technology was further applied to reduce/recover tritium from stack effluents. Tritium processing took place in many of the buildings at Mound.

5.2.4 Substitute Materials, Radium-226, Actinium-227 and Thorium-228

Po-210 has a half-life of 138 days, so the shelf-life of fabricated components was limited. The items had to be replaced and returned for recovery and/or rework. Alternate alpha emitters with somewhat longer half-lives were sought to replace Po-210. One promising candidate was Ac-227, with a half-life of 21 years. A residue containing radium, known as K-65 residue, was received on site in October 1949 for the purpose of recovering the Ac-227 from this material (ORAU, 2003e, p.33). Recovery of Ac-227 from material containing the U-235 series was not as effective as the neutron irradiation of Ra-226 targets to produce the Ac-227. Initial Ra-226 recovery, purification, and production operations began at Monsanto in Dayton. Similarly, work progressed on extraction and production of Ac-227 from irradiated Ra-226. The level of effort for this program was considerably expanded at Mound. However, after rapid growth of the program during 1951 and 1952, the program essentially ended by July 1953, as alpha emitter-beryllium initiators were abandoned in favor of neutrons generated from small D-T accelerators.

5.2.5 Thorium-232 Extraction

In the mid-1950s, Mound was directed to perform the R&D necessary to extract thorium from Brazilian monazite sludge and other thorium-bearing materials. This thorium refinery was to provide target material for irradiation to produce U-233 and the thorium breeder reactor. A Th-232 refinery process pilot plant (the "Monex" process) was assembled in Room 1B of the SW Building in the spring of 1955. Construction began on the thorium refinery to the west of the SW building. The project had barely begun when it was ended. The construction directive was issued on March 11, 1955 and the construction was cancelled on May 9, 1955. However, preparations included receipt of at least 1,650 tons of thorium-bearing material during December 1954 from the National Lead Company of Middlesex, New Jersey. Most was in the form of Brazilian monazite sludge, which

comprises the residue after extraction of other valuable rare earths; however, the lot also included oxalate sludge, recycle metal (thorium metal pieces and turnings), thorium oxide (calcined sawdust), and thorium sulfate (Monex, 1955). The sludge was quite corrosive and many of the 6,000 drums were deteriorated and leaking upon receipt. Although the thorium refinery project had been terminated, the drums posed a high maintenance legacy. Drum deterioration was constant and failure was frequent. For this reason, several hundred drums were periodically re-drummed in the summer months between 1954 and 1966. By 1962, each had been re-drummed twice. Drums were stored in various locations throughout the plant, and in 1964, authorization was received to build a facility (Building 21) to store the material. This facility was completed in 1966, by which time the entire lot had been re-drummed a third time. The facility was essentially a "silo" with no doors or windows and two storage bays. One thousand thirty-eight drums were emptied into the smaller of two basins, and 3,576 were dumped in the large basin (Meyer, date unknown). The remaining drums apparently remained in outdoor storage areas. Since the lot was composed of a variety of materials, some of the drums were likely to have been less corrosive, and so were not repeatedly re-drummed.

5.2.6 Thorium-230 and Protactinium-231

Starting in 1946, the Manhattan Engineer District began seeking supplies of Th-230 (U-238 series) and Pa-231 (U-235 series). The Th-230 was to be used in the Redwing nuclear tests and kilogram quantities were needed for nuclear weapons test diagnostics. Pa-231 and Pa-233 were to be produced by neutron irradiation of Th-230 and Th-232. An Ionium (Th-230) Program was mounted and in 1949 Argonne National Laboratory developed a pilot plant using Th-230-enhanced wastes (known as Cotter Concentrate, St. Louis airport cake or simply Airport Cake) from Mallinckrodt in St. Louis. This was a raffinate produced after solvent extraction of uranium with diethyl ether and after extraction of Ra-226. In November 1955, Mound was directed to construct a facility, within three months, to recover Th-230 from the Airport Cake. By May 18, 1955 five shipments totaling 400 grams (8.16 Ci) had been provided to the AEC. While directed to deliver another 500 grams, Mallinckrodt failed to deliver the required additional Airport Cake. Leftover Airport cake from the first runs was processed, but with difficulties due to concentrated impurities. In the late 1950s, Mound sent the remaining 22 grams of Th-230, along with 250 grams of thorium oxide, to Idaho for irradiation in the high-flux Materials Testing Reactor (MTR). The capsules were allowed to decay for a year in the reactor canal, but it is not known if they were ever processed for recovery of Pa-231 and Pa-233.

Pa-231 was produced in the early 1950s to be a surrogate for Pa-233 for a study of the physical and chemical properties of the element. In the thorium breeder reactor blankets, 27-day Pa-233 was created in the sequence Th-232 → Pa-233 → U-233. Production of Pa-231 proceeded intermittently between the 1950s and September 1979, the first campaign occurring during the period of 1954 through 1958. The feed materials were U-235-bearing raffinates from Mallinckrodt, Fernald, and the Cotter Corp. in Canon City, Colorado. Processing R&D started in 1954 in Room 167 of the R building. Following lab scale pilot tests, Room 145 of the R building was set up to process five-kilogram batches. A pilot plant was installed in the HH building in July 1955. During March 1956, the operation was moved into the SW building and took advantage of some of the thorium refinery equipment. Approximately 20,000 lb. (80 drums) of this Sperry Cake was processed at Mound. This processing consumed approximately half of the material in order to produce the single gram of protactinium requested by the AEC. The remaining drums were to be used to produce another gram, but this work concluded after another 240 mg were produced.

Later efforts to recover Pa-231 used a large amount of another type of residue from the uranium refining process called Cotter Cake. This material had been identified as a useful source of radionuclides during research associated with the Ionium (Th-230) Program. One thousand, two hundred-fifty-one drums of this material were received during 1975 for processing in the pilot plant built in the SW building. This plant ran from 1974 to 1979, during which 22 drums were processed to recover 339 g. of Th-230 and 890 mg of protactinium.

5.2.7 Rare Isotope Programs

The Rare Isotope Programs were originally known as the Separation and Purification of Special Heavy Element Isotopes. They began in the mid-1950s and lasted through 1985. Numerous projects were developed during that 30-year period. A variety of radionuclides and separation processes were generally carried out in the SW, SM, and R buildings. Principal processes included:

- Extraction of U-234 from aged Pu-238 from 1962-1972
- Extraction of Pa-231 and Th-230 from uranium ore "tailings" from 1954-1957
- Extraction of Th-229 from U-233 (from irradiated Th-232) from 1966-mid 1970s
- Extraction of Pa-231 from irradiated Th-230

5.2.8 Uranium-234 from Plutonium-238

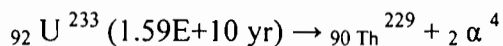
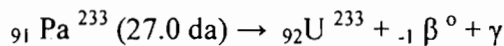
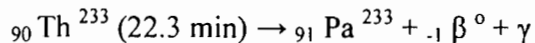
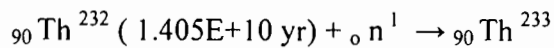
About ten grams per year of U-234 were extracted from Pu-238 from the mid-1950s through the early 1970s. The U-234 oxide was shipped to Oak Ridge for use with U-235 to make neutron flux measurements. U-234 was produced within 13 alpha glove boxes in the R Building. An associated solvent extraction system was in Room 1 of the SM Building.

Most of the Pu-238 was initially precipitated as the oxalate. Pu-238 from returned heat sources was dissolved in nitric acid and then precipitated with dimethyloxalate. The filtrate contained the U-234. The Pu oxalate was calcined at 450° C and returned to storage to permit in-growth of U-234 for future processing. Following evaporation and addition of nitric acid, aluminum nitrate was added to the uranyl nitrate. After pH adjustment, the solution passed through an ion exchange column that adsorbed the U-234. Uranium was eluted from the columns with 7N nitric acid while 0.35 molar nitric acid eluted plutonium. Uranyl nitrate was converted to the chloride and passed into an anion exchange column. Uranium, plutonium and neptunium were distinctly eluted with varying concentrations of hydrochloric acid. Uranium chloride was precipitated with the addition of ammonium hydroxide. The filtered precipitate was washed, dried, and converted to uranium oxalate.

In SM-1, U-234 was recovered from ion exchange raffinate solutions by extraction with tri-n-octylphosphine oxide (TOPO). The aqueous phase was sent to plutonium recovery. Plutonium in the TOPO was stripped by a carbonate solution and also sent for recovery. The remaining TOPO was recycled through the process.

5.2.9 Thorium-229 from Uranium-233 (Irradiated Thorium-232)

Los Alamos provided a kilogram of U-233 in 1958. The U-233 and Th-229 were produced by neutron irradiation of Th-232 as shown in the following reactions.



In 1966, small-scale separations of Th-229 were carried out within a new hot-cell facility in the SW building. Processing of the U-233 began in two Type A glove boxes with a connecting fume hood along the north wall of SW-22. The process also used bench tops in SW-140 and fume hoods in SW-132.

The U-233 was dissolved in nitric acid. Liquid-liquid organic extraction was accomplished by adding di-sec-butylphenyl phosphorate and TOPO in diethylbenzene. Thorium was stripped from the organic phase with 0.5 molar oxalic acid followed by a second strip with 8 molar nitric acid. This process required 20 to 30 hours for a 75 g batch. This program processed 1.5 kg of aged U-233 to produce 30 mg (6 mCi) of Th-229.

The Mound Plant ceased non-weapons work in 1971 and stopped production of weapons components in 1995.

5.3 Mound Radiological Buildings

The following subsections provide a brief overview of the major Mound radiological buildings from February 1, 1949 through August 17, 2007. The source for most of the information below is ORAUT-TKBS-0016-2, which also lists the radionuclides of concern for each building along with other information. For a detailed listing, refer to *Mound Site Radionuclides by Location* (King, 1995)

Mound Unit V Buildings:

- HH Building or Hydrolysis House derived its name from its primary function, the hydrolysis of highly-radioactive bismuth chloride and aluminum chloride solutions. In 1963, the HH Building was converted to stable gaseous isotope separation by use of thermal diffusion, liquid diffusion, and cryogenic processes.
- PP Building or Plutonium Processing Building 38 was completed in December 1967. SM Building processes, fabrication operations, and recovery processes were transferred to PP Building along with waste treatment facilities, R&D (including material research), and analytical laboratory support activities. PP Building was used primarily for processing Pu-238 dioxide received from the Savannah River Plant (SRP).

- R Building or the Research Building was built in 1948. It has handled a number of programs involving a number of radionuclides over the years, including Po-210, H-3, U-238, Ac-227, Pu-238, and Pu-239. The major radionuclide was Pu-238 with research beginning in 1959 and continuing through the 1960s. In addition, R&D was conducted with tritium and experimentation was conducted with metal tritides. Because some tritides were so poorly metabolized, their biological half-lives were in the order of hours.
- SM Building or the Special Metallurgical Building was built in 1960 and became operational in 1961. It was designed to receive a liquid plutonium nitrate mixture from the SRP that was used in a variety of programs, mainly heat source projects. In addition, SM Building housed recovery processing, waste treatment facilities, R&D, and analytical support activities.
- SW Building was similar to R Building, consisting of many laboratories engaged in a variety of research, development, analytical, recovery, and surveillance activities. The "old cave" and "new cave" areas consisted of several rooms set up for "hot" work with several types of alpha and gamma radiation and project capabilities. Other major programs were the thorium refinery project, rare isotope program, neutron source, U-234 separation program, and the tritium programs. The tritium programs included tritium enrichment, effluent capture, process development, component evaluation, and scrap recovery and tritium waste solidification. SW building was used in processing Cotter Concentrate (St. Louis Airport Cake) starting in the early 1970s and terminated late in that decade. Pilot plant operations in SW were designed to recover Th-230 and Pa-231.
- T Building was host to a number of research, development, and production programs using various radioisotopes, including Pu-239, Pu-238, U-233, U-235, and U-238. The two major programs were the polonium and tritium programs. From 1949 to 1973, Po-210 programs included processing and separation, fuels research and development, neutron source, and other research, development, and production programs. This work was performed on the first and second floors. An extensive renovation program from 1966 to 1968 prepared the way for additional R&D work, but the renovations were never used due to unanticipated funding reductions. T Building was essentially dormant from 1969 to 1972 due to this loss of funding. The tritium programs resumed in the early 1970s when a major effort was undertaken to reduce the fugitive emissions of tritium. Other T Building activities included nondestructive testing, environmental testing, gamma and mass spectroscopy, calorimetry, neutron activation analysis, and safeguards R&D. In 1974, decontamination of T-Buildings operations and service floors (50% of the building) was completed (Mound, 1999).
- WD Building, which became operational in February 1949, was the central facility at Mound for the treatment of radioactive liquid wastes. From its inception, this facility included a low-level alpha wastewater system, with SW, R, PP, SM, HH, T, B, and H Buildings as sources. On arriving at WD Building, wastewater was precipitated, coagulated, and filtered, and the sludge was solidified so it could be shipped off site. The supernatant from the clarifloculator was filtered, neutralized to the proper pH, monitored to see if it was below standard, and released to the Great Miami River.

- WDA Building, or the WDA alpha wastewater treatment facility, was built in 1966 as an annex to WD Building for the treatment of plutonium wastewater from the PP and SM Buildings. It was designed as both a high-risk drumming station and a low-risk wastewater treatment facility.
- Special Metallurgical Building, or the SM Building, was built in 1960 and became operational in 1961. It was designed to receive liquid plutonium nitrate mixture from the Savannah River Plant that was used in a variety of programs, mainly heat source projects. In addition, SM building housed recovery processing, waste treatment facilities, R&D, and analytical support activities. (ORAUT-TKBS-0016-2) This building also included the Plutonium Processing (PP) area change room, laboratories, maintenance shops, and building services. This building underwent decontamination and decommissioning starting in 1977. (Ten-Year Plan, 1977)

Contamination Areas

- Area 8, Thorium Contaminated Soils from Areas 1 and 9: This area is located northwest of Building 31, on the SM/PP hill on the eastern side of the Mound site. The area is approximately 25,000 sq ft. Soil was buried in this area from decontamination activities from repackaging of Th-232 sludges in 1965 and 1966. Pu-238 and thorium have been detected in this area.
- Area 10, Debris from Dayton Units: This area is located west of Building 30, on the slope of the SM/PP hill on the East Central portion of the Mound site. It was used for disposal of contaminated concrete from the Dayton Units. One-hundred-sixty truckloads from Unit IV and 100 truckloads from Unit III were deposited here. The area is approximately 15,000 sq ft. The primary contaminant was Po-210. Soil was buried in this area in 1950.
- Area 12, Thorium Contaminated Soil: This area is located west of Building 38, on the SM/PP hill on the East Central portion of the Mound site. Th-232- and Pu-238-contaminated soil from SM building and thorium-contaminated soil from Area 1 were placed in this area in 1965.
- WTS Pipeline: This pipeline line ran from SM building and Building 38 to the WD building. In 1969, the high-risk waste line ruptured below the WD building and resulted in Pu-238 contamination of an off-site portion of the abandoned Miami-Erie Canal bed. In 1991, approximately 600 linear feet of contaminated pipe was unearthed and shipped off-site for burial. The pipe had been the waste line that connected HH Building with the WD facility. (Mound, 1999).

5.3.1 Mound Site Decommissioning

Throughout the operating lifetime of the Mound Plant, facilities that no longer were necessary to site operations were removed from service and isolated, decontaminated, and/or demolished as appropriate. After weapons component production ceased in 1995, the emphasis of site activities shifted to decommissioning facilities. The decommissioning and eventual closure of the Mound Site is being conducted under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and a Federal Facilities Agreement among DOE, USEPA, and Ohio EPA in accordance with a process known as MOUND 2000. Following clean-up, properties at the former Mound Site are conveyed to the Miamisburg Mound Community Improvement Corporation (MMCIC). Land-use restrictions are conveyed with the property, if necessary, to ensure future protection of human health and the environment. Decommissioning management is the responsibility of the DOE Office of Environmental Management (EM). Responsibility for site management will be transferred to the DOE Office of Legacy Management (LM) following completion of clean-up. (Mound Site, Miamisburg, Ohio Fact Sheet, DOE, October 2007) (Transition Plan for the Mound Closure Project, DOE, March 2005).

Since the termination of Mound production activities, the major DOE/EM contractors primarily involved with site closure and decommissioning have been:

- EG&G Applied Technologies Prior to 1995 – September 1997
- BWXTO, Inc. October 1997 – December 2002
- CH2M HILL Mound January 2003 – July 2006 (decommissioning declared complete)

In early 2003, S. M. Stoller Corporation was designated the major site contractor for DOE/LM. Accelerated Remediation Company (aRc) was selected in October 2006 to further remediate the OU-1 Landfill and PRS-441 Rail Yard areas under a congressionally-funded project. These two contracts remain in effect as of this evaluation report. (Personal communication, 2007)

A site assessment in 1995 identified approximately 116 remaining buildings and 400 remaining land sites with potential radioactive and/or hazardous material contamination. The 306-acre site was divided into discrete land parcels: Phase 1 (consisting of subparcels A, B, and C); Parcels 3, 4, 6, 6A, 7, 8, and 9; and Parcels D and H. As of October 2007, Parcels D, H, 3, and 4 have been completed and conveyed to MMCIC; the Phase 1 parcel has been completed, but not yet conveyed to MMCIC; and Parcels 6, 7, and 8 have been remediated and are undergoing the CERCLA review process. The OU-1 Landfill and the Rail-Yard area in Parcel 9 are still in the process of remediation. Further information on the decommissioning activities for specific Mound Site facilities is available at the following DOE/LM web site: <http://www.lm.doe.gov/land/sites/oh/mound/mound.htm>.

5.4 Radiological Exposure Sources from Mound Operations

This section discusses the potential radiological exposure present at Mound during the period under evaluation. These sources include alpha and beta emissions, neutrons, and photons as well as a variety of incidents and accidents.

5.4.1 Alpha

The primary alpha-particle-emitting isotopes at Mound varied from area to area depending on the operations. Table 5-3 lists the alpha-emitting radionuclides of most concern, their radioactive half-lives, specific activities, and primary alpha energies.

Radionuclide	Half-Life	Specific Activity (Ci/g)	Alpha Energy (MeV)
Americium-241 (Am-241)	432 years	3.4	5.5 (85%), 5.44 (13%)
Actinium-227 (Ac-227)	21.77 years	73	4.9 (0.5%), 4.95 (0.7%)
Plutonium-238 (Pu-238)	87.7 years	17	5.5 (72%), 5.46 (28%)
Plutonium-239 (Pu-239)	2.41×10^4 years	6.2×10^{-2}	5.16 (88%), 5.11 (11%)
Plutonium-240 (Pu-240)	6.54×10^3 years	2.3×10^{-1}	5.17 (76%), 5.12 (24%)
Plutonium-242 (Pu-242)	3.76×10^5 years	3.9×10^{-2}	4.9 (76%), 4.86 (24%)
Polonium-208 (Po-208)	2.90 years	5.9×10^2	5.21
Polonium-209 (Po-209)	102 years	17	4.88
Polonium-210 (Po-210)	138 days	4.5×10^3	5.31
Protactinium-231 (Pa-231)	3.28×10^4 years	4.7×10^{-2}	5.0 (79%), 4.73 (11%)
Radium-223 (Ra-223)	11.4 days	5.1×10^4	5.71 (54%), 5.61 (26%), 5.75 (9%)
Radium-224 (Ra-224)	3.66 days	1.6×10^5	5.68 (94%), 5.45 (6%)
Radium-226 (Ra-226)	1.60×10^3 years	1.0	4.78 (95%), 4.60 (6%)
Radon-219 (Rn-219)	3.96 seconds	1.3×10^{10}	6.82 (81%), 6.55 (11%), 6.42 (8%)
Radon-220 (Rn-220)	55.6 seconds	9.2×10^8	6.30
Radon-222 (Rn-222)	3.82 days	1.5×10^5	5.49
Thorium-227 (Th-227)	18.7 days	3.1×10^4	6.04 (23%), 5.98 (24%), 5.76 (21%)
Thorium-228 (Th-228)	1.91 years	8.3×10^2	5.43 (71%), 5.34 (28%)
Thorium-230 (Th-230)	7.70×10^5 years	1.9×10^{-2}	4.68 (76%), 4.62 (24%)
Thorium-232 (Th-232)	1.4×10^{10} years	1.1×10^{-7}	4.01 (76%), 3.95 (24%)
Uranium-233 (U-233)	1.59×10^5 years	9.5×10^{-3}	4.82 (83%), 4.78 (15%)
Uranium-234 (U-234)	2.45×10^5 years	6.2×10^{-3}	4.77 (72%), 4.72 (28%)
Uranium-235 (U-235)	7.04×10^8 years	2.1×10^{-6}	4.4 (57%), 4.37 (18%), 4.58 (8%)
Uranium-238 (U-238)	4.47×10^9 years	3.4×10^{-7}	4.20 (75%), 4.15 (25%)

5.4.2 Beta

Although Po-210 itself does not emit beta radiation, the Bi-209 slugs and their containers, irradiated in reactors to produce Po-210, contained trace quantities of several non-radioactive elements that became activated to produce radioactive contaminants. Handling these slugs in preparation for chemically separating the Po-210 was the primary source of potential beta dose at Mound. Table 5-4 lists the beta emitters of concern from the polonium production process. (ORAUT-TKBS-0016-6)

Radionuclide	Maximum Energy (MeV)	Average Energy (MeV)
Sc-46	0.357	0.112
Zn-65	0.329 (β^+)	0.143
Hg-203	0.213	0.580
Ag-110m	0.531	0.165
Fe-59	1.565	0.615
Co-60	0.317	0.096
Bi-210	1.161	0.389

Beta-emitting radionuclides were present in other Mound operations, but to a much lesser degree than in polonium production. The beta-emitting radionuclides in addition to those in Table 5-4 included members of the naturally-occurring naturally uranium, thorium, and actinium decay chains, Sr/Y-90, Cs-137, and Xe-131. (ORAUT-TKBS-0016-2; ORAUT-TKBS-0016-6)

5.4.3 Neutron

There were three neutron energy spectra at Mound. The principal sources of neutrons at Mound were polonium-based sources (primarily Po-Be sources) and plutonium-based α,n sources (primarily PuF₄ and PuO₂) from the manufacture of radioisotope thermoelectric generators. A Pu-Be source has an average emission energy neutron between 4 and 4.5 MeV; whereas plutonium-based sources have an average emission energy of approximately 1.4 MeV. The third and less common neutron spectrum was a fission spectrum (maximum emission energy of about 2 MeV) from spontaneously-fissioning radionuclides (e.g., Cf-252) and critical assemblies. Neutrons in the workplace would be expected to include a continuous spectrum of energies below the maximum emission energies due to their interactions with different materials. Because moderation of neutron energy occurs through interactions with shielding, facility construction materials, and process equipment and materials, neutrons in the workplace are typically highly-scattered, albeit with a neutron component characteristic of the original source (Neutron, 2001).

Table 5-5 summarizes the respective neutron energy categories used by EEOICPA in accordance with the *External Dose Reconstruction Implementation Guideline* (OCAS-IG-001) applied to Mound site workplaces by facility and operation. (ORAUT-TKBS-0016-6)

Table 5-5: Neutron Energy by Facility and Operation					
Facility	Operation	Period	IREP Energy Category (MeV)	Percentage	
<u>PP Building:</u> Waste Handling area	Th-232 storage and re-drumming	1955-1975	0.1 – 2.0	75	
			2.0 - 20	25	
<u>R Building:</u> R 117	Storage Vault	1949-1990	0.1 – 2.0	50	
			2.0 - 20	50	
<u>SW Building:</u> SW 8	Xe isotope separation	1957-1960	0.1 – 2.0	50	
	SW 11-14 & 16 (area 1B)	Decon of BiSO ₄	1951-1953	2.0 - 20	50
		Pa-231 purification	1956		
	SW 19 (Old Cave)	Radium-actinium separation	1951-1953		
	SW 140 (New Cave), 132, 136, 137	Processing residue from pitchblende production	1970-1979		
	SW 146-147	Metallurgy laboratory	1967-1985		
	SW 219	Neutron source production	1962-1965		
<u>T Building:</u> All but T 43, 44, 48, 50-51, 57-59, 348-359	Po neutron source program	1949-1973	0.1 – 2.0	25	
			2.0 - 20	75	

5.4.4 Photons

Photon sources were present in almost all Mound facilities. Most Mound facilities had mixed fields of neutrons, beta, and photons. The beta field is a lesser concern for many Mound workplaces with respect to external radiation protection because the shielding around the glovebox or process shielding is thicker than the maximum beta range. The energy spectrum was dependent on the particular on-going operation. Table 5-6 summarizes the respective IREP input photon energy category by facility and operation (ORAUT-TKBS-0016-6).

Table 5-6: Photon Energy by Facility and Operation				
Facility	Operation	Period	Energy (keV)	Percentage
<u>HH Building:</u> HH 3, 4, 5, 8	Separation of He-3; Kr-85	1960-1995	30-250	50
HH 5, 6	Pa-231/sludge separation	1955-1956	>250	50
HH 8, 10-12	Hydrolysis of Al and Bi chlorides	1949-1958		
<u>PP Building:</u> Waste Handling area	Th-232 storage and re-drumming	1955-1975	30-250 >250	75 25
<u>R Building:</u> R-117	Storage Vault	1949-1990	30-250 >250	50 50
<u>SW Building:</u> SW 8	Xe isotope separation	1957-1960	30-250	50
SW 11-14 & 16 (area 1B)	Decontamination of BiSO ₄ Pa-231 purification	1951-1953 1956	>250	50
SW 19 (Old Cave)	Radium-actinium separation	1951-1953		
SW 140 (New Cave), 132, 136, 137	Processing residue from pitchblende production	1970-1979		
SW 146-147	Metallurgy laboratory	1967-1985		
SW 219	Neutron source production	1962-1965		
<u>T Building:</u> All but T43, 44, 48, 50-51, 57-59, 348-359	Po neutron source program	1949-1973	30-250 >250	50 50
<u>H Building</u>	Hot laundry	unknown	30-250 >250	25 75
<u>WD Building:</u> WD 1, 8, 101, 104	Wastewater treatment	1949-1990	30-250	50
WD 107	Ultra-filtration	1976-1981	>250	50
WD 112, 113	Analytical work	1966-1979		
WD 113, 118 A&B	Storage, waste incineration	1979-1994		
WD Penthouse	Filter banks	1949-1993		
<u>B Building</u>	Internal dose research	1950-1955	30-250 >250	25 75

5.4.5 Incidents

Documentation of incidents is typically limited to reports of elevated urine activity or specific information describing the exposure scenarios. Based on information NIOSH reviewed, area access controls (e.g., designated/isolated work areas, gloves, vented fume hoods, and glove boxes), personnel protective equipment, and engineering controls were used to limit worker exposure.

Incident reports are available through the Corrective Action Reporting System (CARS). The DOE also had an accident reporting system, known as the DOE Occurrence Reporting System (ORPS). An Energy Employee's (EE's) dose from an incident is expected to be included in the individual dose record provided by the site. If the EE (monitored or unmonitored) states that he/she was involved in an incident(s) in a telephone interview and there are no records in the claim file, an additional data request is made to Mound to attempt to verify the verbal information.

6.0 Summary of Available Monitoring Data for the Proposed Class

Radiation protection was a major concern at Mound from the beginning of operations. Initial Mound external and internal radiation monitoring and protection programs were implemented when work with radioactive materials was undertaken (Meyer, 1992). As at other DOE sites, advances in monitoring knowledge and assay skills led to monitoring improvements and expansion of the scope of Mound worker monitoring.

The primary sources of monitoring data for this evaluation include the NIOSH Site Research Database (SRDB), the NIOSH OCAS Claims Tracking System (NOCTS), logbooks and forms located during data capture events at Mound, and three Mound databases. The Mound databases are designated as the Polonium Reconstruction (PORECON) database, the Plutonium Reconstruction (PURECON) database, and the Mound Environmental, Safety, and Health system (MESH). Two additional databases, the "Data Base of Excretion Data of Other Radionuclides" (ORAU 2003e) and the "Database of Ra-Ac-Th Excretion Data" (ORAU 2003d) have been compiled in part from non-plutonium data found in the PURECON database and from logbooks, cards, and forms reviewed during the Pre-1989 Dose Assessment Project. These latter two databases and the PURECON and PORECON databases contain only internal monitoring data.

Additional data that are available include specific process information regarding Mound operations, including radionuclides and proportions in process systems for some years. These are currently available in the form of progress reports on research activities through 1951, in 1952 and 1953, and from late 1960 onward. Individual reports document specific processes, such as *Bismuth Recovery Process, Engineering Research Final Report* (Bismuth, 1952).

Personnel dose monitoring data are also available in periodic health physics reports, which include summaries of external dose monitoring that state the number of dosimeters processed and the relative doses received. These data are not sufficient to assign individual doses, but do allow assignment of maximum doses when individual doses cannot be reconstructed more precisely based on other records. These data are available for the years 1948 to 1954; additional partial data are available for 1955 through 1959. In this same category are complete records of air monitoring data for some buildings in some years (e.g., R and T Buildings in 1949). This information allows calculation of air

concentrations in specific rooms, and overestimated internal doses may be calculated from these values when individual bioassay data are unavailable or unusable. Air concentration data are also summarized in periodic health physics reports. Though these are not useful for assigning individual doses, they do allow estimation of maximum doses.

Some qualitative information in the reports is useful to ensure that health physics practices are modified to take changing source terms into account. Incidents and activities are also described. Quantitative data on the number of wipe surveys performed, the number of air samples taken, by area and room, support the correlation of air sample results with specific potential source terms.

6.1 Mound Internal Monitoring Data

Summaries of the available *in vitro* and *in vivo* data, as well as general overviews of sampling and analytical protocols, are provided in the following subsections. Additional details, including analytical methods, detectable activities, and reporting protocols can be found in the Mound Occupational Internal Dosimetry TBD (ORAUT-TKBS-0016-5) and in the *History of Mound Bioassay Programs* (Meyer, 1992).

As noted in ORAUT-TKBS-0016-5, radionuclides were categorized by Mound staff as either primary or secondary based on the potential extent of use and the amount of bioassay data available. Primary radionuclides of concern are discussed in Mound internal dosimetry documentation, the *History of Mound Bioassay Programs* (Meyer, 1992), and *Mound Site Radionuclides by Location* (King, 1995):

Primary radionuclides assessed for occupational internal exposure included:

- Po-210
- Plutonium Isotopes: Pu-238, Pu-239*
- Tritium

* Because Pu-240, Pu-241, and Pu-242 do not comprise a dosimetrically-significant proportion of the major plutonium source terms, NIOSH has chosen not to include these in its discussion.

The above radionuclides were identified as primary because they were present in larger quantities and were more widespread at the site, often in multiple buildings and facility processes. Correspondingly, more monitoring data and site documentation are available (than for secondary radionuclides) to evaluate internal doses associated with these radionuclides. Primary on-site operations used all of these radionuclides in conducting key mission activities.

Secondary radionuclides include those that were of limited use at the site or involved limited worker exposures. Often referred to as "other" radionuclides in Mound documents, they were part of smaller programs involving relatively few people. Many of the programs were relatively short-term research projects and brief production runs, and source material was received intermittently (MJW, 2002, Phase II, Appendix C). Fewer internal dosimetry data are available for these radionuclides than for the primary radionuclides. Available data for secondary radionuclides were collected from several sources during the Pre-1989 Dose Assessment Project and combined into two Excel spreadsheets: *Database of Ra-Ac-Th Excretion Data* (ORAU 2003d) and the *Database for Other Radionuclides*

(ORAU 2003e). Data sources included logbooks, cards, and non-plutonium data extracted from the PURECON database.

In addition to daughter products from the uranium and thorium decay chains, secondary radionuclides included:

- Americium-241
- Curium-244
- Uranium Isotopes: U-238, U-235, U-234, U-233
- Thorium Isotopes: Th-232, Th-230, Th-228
- Actinium-227
- Radium Isotopes: Ra-228, Ra-226, Ra-224, Ra-223
- Radon Isotopes: Rn-222, Rn-220, Rn-219
- Protactinium-231

Mound also engaged in biomedical research using Calcium-45, Iron-59, Cobalt-60, Zinc-65 and other radionuclides. The quantities were minor compared to the primary and secondary radionuclides, and they were used in very few buildings for limited periods. Most of these radionuclides were present as sealed sources. Worker exposure was less likely, and bioassay data were not collected.

Mound bioassay included primarily *in vitro* urine data and limited fecal sample results. *In vitro* urine data are the primary source of information to support dose reconstruction. Fecal analyses, *in vivo* chest counting, and air sampling information are considered of limited use due to limited availability (ORAUT-TKBS-0016-5). Additionally, these latter data are not kept in a central electronic database, but rather are maintained as hard-copy records, usually associated with an individual worker's file. Fecal monitoring results from 1990 onward are available from MESH; 29 fecal results associated with eleven people sampled between 1966 and 1982 are in the PURECON database. Derived air concentration (DAC) data are available electronically from 2000 onward, but all other air monitoring data are on hardcopy. *In vivo* data are only available on hardcopy.

Various bioassay programs were conducted at Mound from 1945 to the present using routine urine samples collected from workers (Meyer, 1992). Table 6-1 lists primary bioassay programs with reported radionuclide action levels for a urine sample in counts per minute, workers who were monitored, and frequency of monitoring.

Table 6-1: Bioassay Programs and Action Levels				
Bioassay program	Period	Action levels ^a	Monitored workers	Frequency
In vitro monitoring				
Po-210 (Postum) recovery	1945-1974	10 cpm 50 ml ⁻¹	Operations personnel	Weekly 24 hr to Monthly
Ac-227, Ra-226, Th-228	1951-1960	8.3 cpm 24 hr ⁻¹	Research personnel	Weekly 24 hr
Th-232 sludge, re-drumming	1955-1975	2.8 cpm 24 hr ⁻¹	Th Refinery personnel	Monthly 24 hr
Th-230 (Ionium) research	1956-1959	3.5 cpm 24 hr ⁻¹	Research personnel	Bi-Weekly 24 hr
Pa-231 extraction	1956-1960	2.2 cpm 24 hr ⁻¹	Research personnel	Monthly 24 hr
U-233 research	1958-1960	20 cpm 1,500 ml ⁻¹	10 Research personnel	Weekly 24 hr
Tritium (hot gas) production	1957 to plant closure	10 μ Ci L ⁻¹	Recovery personnel	Weekly Spots Weekly 24 hr
Pu-239 neutron source	1957 to plant closure	3.5 cpm 24 hr ⁻¹	Processing personnel	Weekly 24 hr to annually
Pu-238 heat source	1960 to plant closure	3.5 cpm 24 hr ⁻¹	Processing personnel	Weekly 24 hr to annually
Am-241 & Am-243	1983 to plant closure	0.0 pCi/d ^b	Potentially exposed personnel	As needed
Cm-244	1983 to plant closure	0.0 pCi/d ^b	Potentially exposed personnel	As needed
In vivo monitoring				
Whole body counting	1960-1970	Not Available	Operations personnel	Annual
Chest counting	1983 to plant closure	Variable ^c	Operations personnel	Annual

a. AL = action levels; observed counts per minute for 50 ml or 24-hour samples that result in a worker dose of 300 mrem/wk to the target organ.

b. Smallest reported activity in database.

c. Chest counting MDAs reported in the Mound TBD, Table 5-19 for Am, Pu, Th, and U isotopes. MDAs range from 0.1 nCi for Am-241 to 130 nCi for Pu-239.

Routine bioassay monitoring included collection of spot and 24-hr urine samples, as identified in Table 6-1. For example, only those workers conducting research to separate and purify protactinium were monitored monthly for Pa-231. Twenty-four hour samples were also requested for Po-210 and the plutonium isotopes, typically as a follow-up to a potential intake. Monitoring frequencies were inferred from personnel sampling records.

Individuals identified as being involved in an internal exposure incident, or who had urinalysis results in excess of the reporting limits, were required to submit additional 24-hr urine samples for analysis. Administrative personnel were not monitored and monitoring was discontinued for operational personnel if their work on a specific project was no longer needed. Operational personnel were monitored annually by whole-body or chest counting, or if there was a suspected exposure incident.

Mound used the action levels in Table 6-1 to evaluate and control worker doses to a 300 mrem/week target organ dose limit. Results in excess of action levels triggered re-sampling and placement of the worker on the "hot roster" to control further exposures, if necessary. Typical dosimetry controls were in place by 1949 when Mound operations were moved from the Dayton facility. These controls followed the limits stated in the *National Bureau of Standards Handbook 52* (NBS, 1953).

Gross alpha analyses were conducted at Mound, and until 1980, activity was assigned to specific isotopes of plutonium and other alpha emitters based on sequential gross alpha counting or chemical separation followed by gross alpha counting. Alpha spectrometry capable of identifying specific alpha-emitting isotopes was not introduced until 1980.

Individual radium bioassay samples were counted three times in a low-background proportional counter over a period of weeks. The individual radium isotope activities were then estimated by solving a system of simultaneous equations. This procedure requires equilibrium assumptions to properly infer activity associated with individual decay chain radionuclides. For example, sequential gross alpha counting was conducted on bioassay urine samples following radium extraction by coprecipitation to quantify Ra-223, Ra-224, and Ra-226 activity. Evaluation of alpha activity with decay time allowed the activities of individual radium isotopes to be estimated.

6.1.1 Tritium Bioassay

Tritium urinalysis for workers started in 1957. In 1958, an analytical method using a vibrating Reed Electrometer was officially adopted from a Savannah River Plant procedure and continued to be used into the early 1960s. Liquid scintillation counting began in 1961. Tritium results were always reported in units of activity per liter of urine.

Available tritium data are contained within the MESH database. Data from 1957 through 1981 (over 30,000 records) are in the form of annual dose summaries for workers. The remaining employee records (~ 250,000) span from 1981 through January 2006 and include bioassay results.

6.1.2 Polonium-210 Bioassay

All Mound employees working in polonium operations in T, HH, WD, H, B, and R Buildings were required to submit weekly spot urine samples (Meyer 1992). Samples were usually collected on Monday and Wednesday, or on Monday, Wednesday, and Friday. Po-210 bioassay data were documented on several different types of records at Mound (Meyer, 1992; Spitz, 1989). Weekly reports of urinalysis data were kept for workers; they were grouped by location with entries in cpm per specified volume and with 24-hr samples identified. Weekly results were transcribed onto Polonium Cards for individual workers with entries in cpm/50-ml unless otherwise stated. Twenty-four Hour Reports were also kept and used to convert individual 50-ml spot samples collected on a single day to a volume-weighted average 24-hr excretion in cpm. Finally, Special and Unscheduled Sample Forms were kept when any additional urine samples were required to document possible worker exposures, or to confirm previous results, with all entries in cpm and duplicate sampling indicated.

Bioassay data for Po-210 have been placed in the PORECON database by MJW by evaluating individual dosimetry files from original logbooks and data cards during their work on the Pre-1989 Dose Assessment Project (MJW, 2002, Phase I; MJW, 2002, Phase II). This database contains 207,750 individual sample results spanning from 1944 to 1973. Bioassay results are reported as Bq/d, cpm, and dpm in this database.

A summary of the number of records/year applicable to the proposed class time frame is presented in Table 6-2.

Year	1949	1950	1951	1952	1953	1954	1955	1956	1957	1958	1959	1960	1961
Records	16,550	18,064	17,332	18,360	10,957	2,638	1,787	1,752	2,309	2,754	3,219	5,124	6,472
Year	1962	1963	1964	1965	1966	1967	1968	1969	1970	1971	1972	1973	
Records	7,743	7,890	8,343	7,090	6,659	7,526	6,444	3,194	1,043	353	74	31	

6.1.3 Plutonium-238 and Plutonium-239

Bioassay of the plutonium isotopes at Mound underwent considerable change and improvement with the development of specific methodologies to isolate and count Pu-238 and Pu-239. The various methodologies are discussed in the Mound Occupational Internal Dosimetry TBD (ORAUT-TKBS-0016-5); however the major features of the internal dose monitoring program for plutonium are summarized in Table 6-3 below.

Period	Reporting level ^a	Analytical method
1954-1960	(Kirby, 1954) 0.05 dpm 1.5 L ⁻¹ 0.5 dpm 1.5 L ⁻¹ (Corrected DL) ^b	Alkaline earth phosphate co-precipitation; plutonium separation with cerium carrier; gross alpha for plutonium; proportional counting; recoveries 6-85% due to colloidal plating of metabolized Pu.
1961-1967	(Kirby, 1954) 0.1 dpm 1.5 L ⁻¹	Sample acidification; alkaline earth phosphate co-precipitation; plutonium separation with cerium carrier; gross alpha for plutonium; proportional counting; recoveries 90 ± 3%. Uranium and plutonium results reported separately only in 1966 using anion exchange methods.
1968-1977	MD-20736 (Mound 1963) 0.1 dpm 1.5 L ⁻¹	Alkaline earth phosphate co-precipitation; plutonium separation with cerium carrier; anion exchange; electro-deposition; gross alpha reported for plutonium; proportional counting.
1978-1979	MD-80030 (Mound 1981) 0.1 dpm 1.5 L ⁻¹	Alkaline earth phosphate co-precipitation; plutonium separation with cerium carrier; anion exchange; electro-deposition; alpha spectroscopy for Pu-238 and Pu-239/240; Pu-242 tracer.
1980-present	MD-80030 (Mound 1981) 0.07 dpm 1.5 L ⁻¹ for routine samples	Alpha spectroscopy for Pu-238 and Pu-239/240; anion exchange; Pu-242 tracer; blanks counted for decision level determination.

- a. The 24-hr reporting levels are based on a standard sample volume of 1.5 L. Standard man in ICRP Publication 2 (ICRP, 1959) and Reference Man in ICRP Publication 23 (ICRP, 1975) both have a urine volume of 1.4 L. Actual collected urine volumes will vary.
- b. Detection limit was corrected for a low chemical recovery of 10% due to colloidal plating of plutonium.

Plutonium data are now readily available from the PURECON database. The PURECON database was established in 1991 by work performed by the University of Lowell Research Foundation. This work was undertaken to meet the requirements of DOE Order 5480.11, *Radiation Protection for Occupational Workers* (DOE, 1988), which became effective on January 1, 1989. In brief, Mound staff recognized that it needed to develop more reliable internal dosimetry record-keeping for plutonium; this resulted in the construction of a computer database from the original raw data. Subsequent QA/QC and repair work on the PURECON database has been performed (and documented) by MJW during its work on the Pre-1989 Dose Assessment Project (MJW 2002, Phase I; MJW, 2002, Phase II).

A summary of the number of records/year applicable to the proposed class time frame is presented in Table 6-4.

Year	1956	1957	1958	1959	1960	1961	1962	1963	1964	1965	1966	1967
Records	78	95	81	98	343	808	1,454	2,267	2,797	3,632	11	3,718
Year	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979
Records	3,299	2,699	2,642	2,384	2,804	2,312	2,093	1,573	1,160	1,322	1,365	1,238
Year	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991
Records	1,227	1,250	1,276	1,380	1,388	1,422	1,318	939	926	1,112	1,562	1

6.1.4 Radon Isotopes

Sources of radon (Rn-222), thoron (Rn-220), and actinon (Rn-219) were present at Mound due to radium and thorium processing and separation of Pa-231 and Ac-227. Thorium sludge from Th-232 extraction and purification operations was stored outside in drums from 1954 to 1966. In 1966, thorium sludge stored in individual drums was transferred to storage basins in Building 21. The thorium was re-drummed and removed from Mound in 1974 and 1975. In 1975, 1,258 drums of Cotter Concentrate were stored to support purification of Pa-231 and Th-230. Table 6-5 shows the results of various radon surveys at Mound.

Building	Survey dates	Gas concentration (pCi/l)			WL	WLM yr ⁻¹ (a)
		Radon	Thoron	Actinon		
SW Tunnel	10/12/79	88,000	28,000	640,000		
SW19 before vent	6/79-10/79	67-160				
SW19 after vent	3/80-4/80	7.7-13.4			0.03	0.4
	12/89	2.6	Not Detected			
	12/99	1.0-5.8^b				
	4/00	0.7-7.2				
	1998-2000	5.8-12				
SW21	5/83	17.5-52.8				
	12/89	34-118		0.3-0.7	0.4-1.3	4.7-15.3
	4/90-6/90	117-161			0.85	10.0 median
		125			median	"
SW22	6/90	125				
SW48	12/89	3.2				
Old SD	12/89	1.5-2.4				
Fire station	12/89	1.2-1.4				
Paint shop	12/89	0.9-1.2				
A	10/88-2/89	0.1-1.1				
All other buildings	12/89	4	0.4-0.9			
Outside facilities	5/83	0.24-0.59				
Reported background		0.1 to 2.1 Average = 0.5				

- a. Working level months per year (WLM yr⁻¹) were determined as WL (2000 hr yr⁻¹) (1/170 hr WLM⁻¹).
- b. Bolded concentrations were derived from charcoal canister measurements.

The following radionuclide-specific program and internal data availability information was initially collected during work performed for the Pre-1989 Dose Reconstruction Project. Unless noted otherwise, the source first summarizing the information presented below is the "Other" Radionuclides Position Paper contained within the Phase II final Report (MJW, 2002, Phase II). Available bioassay data for the following radionuclides have been compiled into Excel spreadsheets titled *Database of Excretion Data of Other Radionuclides* (ORAU 2003d) and the *Database of Ra-Ac-Th Excretion Data* (ORAU 2003e).

6.1.5 Protactinium-231

Programs involving the recovery and purification of Pa-231 began in the early 1950s and continued intermittently to September 1979. The initial campaign ran from August 1954 through October 1958 and used a Mallinckrodt raffinate known as "Sperry Cake" as a feed material. Later efforts to recover Pa-231 used another type of residue from the uranium refining process called Cotter Cake. This material had been identified as a useful source of radionuclides during research associated with the Ionium (Th-230) program. One thousand, two-hundred-fifty-one drums of this material were received during 1975 for processing in the pilot plant built in the SW building. This plant ran from 1974 to 1979, during which 22 drums were processed to recover 339 g of Th-230 and 890 mg of protactinium.

The bioassay program to support the recovery/purification process of protactinium began in August 1955 (Meyer, 1992). The samples were subjected to various precipitation and dissolution procedures to extract radium, thorium and protactinium fractions (Kirby, 1952; Kirby, 1954; Kirby, 1959). The available protactinium data were found in a historical file within a notebook during the Pre-1989 Dose Reconstruction Project and are now compiled in the *Data Base of Excretion Data of Other Radionuclides* (ORAU 2003e).

6.1.6 Thorium-230

The bioassay program for Th-230 ran from March 1956 through September 1958. Initially, 24-hour urine samples were collected, thorium separation was performed, and the thorium fraction was analyzed. It appears that this process did not provide the desired results and, after about 10 samples (about mid-May 1956), the procedure was changed to a "radium separation." It was most likely assumed that Ra-226 was in equilibrium with its parent Th-230; thus, all counts would be considered ionium counts.

Primary Th-230 bioassay records consisted of a log book and duplicate records in a brown notebook (ORAUT-TKBS-0016-5). Secondary Th-230 results included a form (Form O-634) and then began as weekly reports on March 17, 1958. Weekly reports included Name, Isotope, and Result. Results reported on Form O-634 included: Name, Badge Number, Date, Type of Analysis, Isotope, and Result (MJW, 2002, Phase I). The *Database of Ra-Ac-Th Excretion Data* now serves as the repository for these data (ORAU, 2003d).

6.1.7 Thorium-232

The Thorium-232 Refining Program was a process intended to produce thorium salts. These salts were to be produced in a newly-constructed refinery and used to produce metallic thorium for the thorium fuel cycle of the breeder reactor. The research and development for the refining process, known as the Monex Process, was done in the R Building. The directive to construct the required refinery was issued in March 1955, but construction was canceled in May of the same year. Research work on the pilot plant continued and was completed in July 1955.

Although a small number of samples were processed between 1951 and 1954, the primary urinalysis sampling to support Th-232 refining and subsequent re-drumming of source materials began in August 1955 and continued until November 1959.

Approximately 170 samples are available for Th-232 in the years between 1960 and 1967. A total of 25 samples are available from the years 1972, 1978, and 1979 (combined). Bioassay records indicate that urine samples from persons involved in the Thorium-232 Program were analyzed for both radium and thorium. The thorium is assumed to be Th-232, Th-228, and Th-230.

6.1.8 Substitute Materials, Radium-226, Actinium-227, and Thorium-228 Records

As part of the Substitute Materials Program, a search was undertaken for other alpha-emitting isotopes with neutron-generating efficiency comparable to Po-210. Ac-227 was selected as a possible replacement for Po-210 for initiator production. This program involved the separation of Ac-227 from neutron-irradiated Ra-226.

Between June and October 1954, almost 48 g of radium had been processed and canned. This work resulted in 47.5 Ci of Ra-226, 14.9 Ci of Ac-227, and 24.6 Ci of Th-228 being purified by the end of the year.

Urine analysis techniques were developed to support the processing of neutron-irradiated Ra-226 in the SW Building. According to the *History of Mound Bioassay Programs* (Meyer, 1992), preliminary work for analyzing urine samples containing Ra-226, Ac-227, and Th-228 was completed in 1952. A few urine samples were analyzed in 1951 and 1952 as part of the research work for the program. Several cases of personnel exposure were detected by routine urinalysis in December 1952. Results of these 1952 samples do not appear to be in any logbooks, nor could data sheets be found. At the time, urine samples were being analyzed by a simple procedure for radium only.

Differential decay analyses indicated that in addition to the radium, varying amounts of actinium and thorium were present in the samples; therefore, a new procedure was developed to determine their respective activities. To accomplish this, thorium and radium were chemically separated from the urine samples and the radium fraction was counted for total activity. Ra-223 is a decay product of Ac-227 via Fr-223 (1%) and Th-227 (99%). Ra-224 is a decay product of Th-228. Ra-223 and Ra-224 have short half-lives so they grow in relatively rapidly. Decay and in-growth curves were plotted and activities calculated using these curves. Samples were counted periodically for several weeks and simultaneous equations were then used to determine the activity of Ra-226, Ra-223, and Ra-224. The quantity of Ac-227 and Th-228 could then be inferred from the results.

According to the *History of Mound Bioassay Programs* (Meyer, 1992), sixteen people are listed as having participated in the program. However, a compilation of data during the Pre-1989 Dose Assessment Project shows approximately 120 people as having submitted urine samples for radium analysis. The last routine sample was processed in February 1959 when decontamination of the Cave Area was completed. A few more samples were analyzed between 1963 and 1967.

6.1.9 Uranium Records

Several isotopes of uranium have been used at various times throughout the history of Mound. The largest uranium program appears to have involved about ten people in limited research on U-233 during 1958 and 1959. This was most likely a part of the reactor fuels program. Urine sampling for this program began in July 1958 and ended July 1959. Over 130 bioassay results are available for this time period.

From 1962 to 1972, another program produced U-234 by chemically separating it from aged Pu-238 (Meyer, 1992). About 10 grams (6.2E-02 Ci) were produced annually; the U-234 that was produced was shipped as the oxide. There was no indication of a specific bioassay program associated with this work.

There was also a program involving U-233 beginning in 1966 and continuing into the mid-1970s (Meyer, 1992). In this program, 1.5 kg of aged U-233 were processed to obtain 30 mg of Th-229. However, the Annual Overview section of the Meyer document only indicates a bioassay program for uranium through 1966. Available uranium bioassay records are limited to 44 bioassay results from 1965-1966. Of these, five were specifically labeled as U-233 results.

A gross alpha procedure was used for analyzing the uranium content of spot urine samples. The majority of available uranium urine sample results do not indicate which isotope of uranium was suspected to be present. Spot samples were used for screening; 24-hour samples were collected when a more precise or definitive result was needed. An anion exchange procedure was used on the later samples.

6.1.10 Americium-241 and Curium-244

Documentation for Am-241 and Cm-244 is very limited. Primary records for Am-241 and Cm-244 are unknown. The available data were first discovered in (and extracted from) the PURECON database during the Pre-1989 Dose Assessment Project (MJW, 2002, Phase II). Seven bioassay results are available for Am-241 for one person in 1987. Thirty-eight Cm-244 results are available for six workers in 1983, and two results for an individual in 1986. All Am-241 and Cm-244 urinalysis data are in units of activity (pCi). The MJW Report (MJW, 2002, Phase II) assumed that Am-241 and Cm-244 data in Mound dosimetry records are in units of activity excreted per 24-hour period. From currently available records, it is unclear in which programs the monitored people were involved.

6.2 Mound External Monitoring Data

The following discussion provides a summary of the Mound site external dosimetry program as well as the types, quantity, and quality of data that can be used for external dose reconstruction. Details regarding the dosimeters used are presented in ORAUT-TKBS-0016-6. Additional information regarding the external dosimetry equipment, methodologies, and techniques in use during most of the proposed class time period is provided in the *History of Personnel External Dosimetry Program at the Dayton Project and Mound Laboratory 1946-1993* (Meyer, 1994).

In 1948, as initial operations were being planned for the newly-established Mound Laboratory, Mound's health physicists, employed by the Monsanto Chemical Company, consulted with their counterparts at the Oak Ridge National Laboratory concerning external dosimetry techniques that would be appropriate for continuing the Po-210 production operations previously conducted at locations in the Dayton area. A continuous external dose monitoring program began. This program developed policies and made programmatic corrections as necessary. Mound used a film badge external dosimetry monitoring system from 1946 to 1977. From 1977 to the present, Mound has used a TLD system. Records of radiation exposures from personnel dosimeters worn by workers and co-workers are available for all years of the proposed class time period. The MESH database serves as the primary electronic repository of these records. It contains all radiation doses measured for Mound employees from 1947 to 2005. Periodic health physics reports contain summaries of the number of dosimeters read for each period, and the number of results in each of several dose ranges. When individual doses cannot be reconstructed more precisely, maximum doses can be based on these reported results.

Individual dosimeter cycle results are not complete in that, at the end of 1977, the Mound dosimetry group was unable to recover any individual monitoring data for the previous years from the mainframe computer. A summary report was generated of the annual recorded doses of all monitored employees from 1947 through 1977 (Guido, 2003; Meyer, 1994, Volume III, 1973 Appendix 3; pp. 207-211). Individual dosimeter results survive in some employee claimant files for employees with early termination dates (before about 1960). Discovery efforts are on-going to retrieve the balance of individual employee cycle data.

Positive photon doses are present in the records for many workers from the beginning of Mound site operations, and neutron doses were first recorded in 1949.

Recorded beta doses are uncommon in Mound site records until approximately 1960. Data from Dayton Units III and IV did include some beta measurements. Photon exposures were based on the optical density of the monitoring film behind a shield (e.g., brass, Cd, Te, Ta) sufficient to block low-energy radiation, including beta particles; the optical density of the 'unshielded' or 'open-window' portion of the film could be used to estimate beta doses. However, early beta doses were not read and are not a part of employee records until at least January 1960 (Meyer, 1994, Volume I, p. 164). The reason for this lack of data is that beta dose rates were likely low in the T Building, which was specifically designed to isolate the process solutions. On December 1, 1965, technicians began to read the open-window portion of the film as well as the area behind the shield (and the sensitive and insensitive films as well) as part of the calibration procedure. The purpose of the additional measurements was to permit better evaluation of low-energy gamma photons (Meyer, 1994, Volume I, p. 310). Evaluation of the MESH database for beta results generally supports Meyer's report of beta monitoring. Though a few results are noted for earlier dates, significant numbers of beta results are not noted until 1968.

Table 6-6 presents a summary of the available external monitoring records. To obtain a count of the minimum number of records believed to be beta-only measurements, the database was queried for the number of beta results that were greater than the recorded deep dose. This resultant yearly count has been included in Table 6-6.

Table 6-6: Summary of External Monitoring Data in the MESH Database
(Table 6-6 spans two pages)

Year	Number of Workers Monitored	Number of Records Available ^a	Number of Beta Records ^b
1949	620	620	1
1950	630	630	0
1951	669	669	0
1952	654	654	0
1953	579	579	0
1954	321	321	0
1955	209	209	0
1956	168	168	0
1957	203	203	0
1958	302	302	0
1959	384	384	0
1960	502	502	0
1961	608	608	1
1962	663	663	1
1963	751	751	1
1964	993	993	1
1965	1036	1036	5
1966	1323	1323	2
1967	1397	1397	2
1968	1436	1436	423
1969	1485	1485	554
1970	1506	1506	1208
1971	1396	1396	835
1972	1412	1412	219
1973	1410	1410	142
1974	1331	1331	866
1975	1539	1539	1075
1976	1059	1059	755
1977	1306	2452	1464
1978	1324	8757	1978
1979	1464	8889	1717
1980	1600	9355	1324
1981	1792	10099	1376
1982	1987	9244	1373
1983	2300	9403	2018
1984	3315	10955	5718
1985	3508	10996	6362
1986	3309	12421	4889
1987	3957	14504	5083
1988	4638	16382	5000

Table 6-6: Summary of External Monitoring Data in the MESH Database
(Table 6-6 spans two pages)

Year	Number of Workers Monitored	Number of Records Available ^a	Number of Beta Records ^b
1989	4386	15769	386
1990	4191	14947	127
1991	4227	13151	166
1992	5036	12958	42
1993	7589	24374	24
1994	6294	17571	18
1995	2246	6182	22
1996	1325	4478	133
1997	1056	3488	125
1998	947	3112	32
1999	1017	3617	84
2000	978	3117	7
2001	846	2617	12
2002	781	2419	29
2003	603	898	0
2004	70	158	3
2005	58	114	0

^a Prior to 1977, only individual annual summaries are available; therefore, the number of records equals the number of employees. After 1977, dosimeter readings are available. Records typically include both photon and neutron measurement results.

^b The number of beta records represents the number of results where the beta dose is greater than the recorded deep dose for a given dosimeter.

Table 6-7 summarizes general dosimeter types used and assignment policies.

Table 6-7: Mound Dosimeter Use and Assignment Policies	
Date	Photon dosimetry
February 21, 1949	Operations began in T Building. Film badges, one sensitive and one insensitive film, with 1-mm cadmium filter read weekly and two pocket ion chambers read daily. Beta window not read.
December 1951	Film badges read every 2 weeks.
May 1966	Use of pocket ion chambers discontinued.
September 1968	New dosimeters with security credential. Based on Nevada Test Site badges but with different filters. Modified later with TLD photon dosimeters plus Nevada Test Site neutron dose film. In 1977, questions were raised about low-energy photon dose underestimates with tantalum shields.
1972	Routine extremity dosimetry began.
December 1977	All-TLD dosimeters introduced.
October 1986	New soft-pack dosimeters.
June 1991	New hard-pack dosimeters with neutron track etch capability.
June 1993	Added neutron track etch capability for future use.
September 1949	NTA track etch film for fast neutrons first used in T and R Buildings. Read 10 fields at 980 power magnification and averaged readings.
September 1956	Began reading 10 fields at 430-power magnification with projection microscope and averaged values.
December 2, 1957	Returned to using 980-power projection microscope to read NTA film.
January 21, 1963	Began routine monitoring of night maintenance staff in Building P.
March 1963	Began using 400-power projection microscope. Reading 64 fields and averaged.
October 1964	Began using new projection microscope with better light.
March 1966	Began badging all hourly Engineering Department staff members who spent a portion of their time in radiation control areas of plant.
April 1967	Began using another new projection microscope, first at 500-power, then at 1,000-power.
August 1, 1968	Exchange frequency for Buildings R and SW personnel changed to 4 weeks.
Nov./Dec. 1977	All-TLD dosimeters introduced. Began using TLDs for neutron exposure monitoring.
October 1986	New soft-pack dosimeters.
June 1991	New hard-pack dosimeters with neutron track etch capability.
June 1993	Added neutron track etch capability for future use.

Table 6-8 below summarizes the beta-photon dosimeter types, exchange frequencies, and types of workers who were monitored.

Table 6-9 below summarizes the neutron dosimeter types, exchange frequencies, and types of workers who were monitored.

Table 6-8: Beta-Photon Dosimeter Types and Exchange Frequency

Period	Dosimeter type	Dosimeter holder	Exchange frequency	Comments
2/1949-11/1951	DuPont D552	Oak Ridge/steel	Weekly	All radiation workers
12/1951-1957	DuPont D552	Oak Ridge/steel	Biweekly	All radiation workers
1957-1960	DuPont (model unknown)	Oak Ridge/steel	Biweekly	All radiation workers
1961-1962	DuPont 558	Oak Ridge/steel	Biweekly	All radiation workers
1963-1968	DuPont D556	Oak Ridge/steel	Weekly	Some radiation workers
			Biweekly	Most radiation workers
			Monthly	General area workers
1968-1969	DuPont D556	Oak Ridge/steel	Biweekly	Dependent on work area
			Monthly	
			Quarterly	
1970-1977	Kodak Type 3	Mound holder	Biweekly	Dependent on work area
			Monthly	
			Quarterly	
1977-1986	Harshaw 8810 TLD-700	Cyclocac	Biweekly	Dependent on work area
			Monthly	
			Quarterly	
1986-1987	Harshaw 8810 TLD-700	Cyclocac	Monthly	Dependent on work area
			Quarterly	
1987-1991	Harshaw 8810 TLD-700	Cyclocac	Monthly	All employees monitored
			Quarterly	
1991-site closure	Harshaw 8801 TLD-700	Cyclocac	Monthly	Dependent on work area
			Quarterly	

Table 6-9: Neutron Dosimeter Types and Exchange Frequency

Period	Dosimeter type	Dosimeter holder	Exchange frequency	Comment
1949-8/1951	Kodak NTA	Oak Ridge/steel	Weekly	All radiation workers
8/1951-1957	Kodak NTA	Oak Ridge/steel	Biweekly	All radiation workers
1957-1960	Kodak NTA	Oak Ridge/steel	Biweekly	All radiation workers
1961-1962	Kodak NTA	Oak Ridge/steel	Biweekly	All radiation workers
1963-1968	Kodak NTA	Oak Ridge/steel	Weekly	Some radiation workers
			Biweekly	Most radiation workers
			Monthly	General area workers
1968-1977	Kodak NTA	Mound holder	Weekly	Dependent on work area
			Biweekly	
			Quarterly	
1977-1986	Harshaw TLD-600 TLD-700	Cyclocac	Weekly	Dependent on work area
			Biweekly	
			Quarterly	
1986-1987	Harshaw TLD-600 TLD-700	Cyclocac	Monthly	Dependent on work area
			Quarterly	
1987-1991	Harshaw TLD-600 TLD-700	Cyclocac	Monthly	Dependent on work area
			Quarterly	
1991-2003	Harshaw TLD-600 TLD-700	Cyclocac	Monthly	Dependent on work area
			Quarterly	

Early Mound site neutron dosimeter results were more accurately measured using NTA film than the spectra present at most AEC sites, due to the higher-energy spectrum associated with Po-Be sources. For this reason, Mound neutron doses can be based substantially upon measured doses even in the NTA film era. Periodic health physics reports demonstrate that not all workers were monitored for neutron doses; however, neutron dosimeters were required for work in those areas with significant neutron dose rates. For this reason, those workers with the highest potential neutron doses are assumed to have been monitored, which provides a sufficient basis for estimation of a maximum neutron dose for others workers.

6.3 Mound Air Sampling Data

Mound health physics program records include a number of air samples for alpha- and beta-emitters. Typically, such data are of limited use in dose reconstruction due to the great uncertainties associated with the doses estimated based on measured air concentrations. When possible, dose reconstructions are usually performed based on data related to a specific claim (including bioassay data), which provides a much more direct assessment of the uptake of a given radionuclide and the resulting organ dose. Air concentration measurements are used to assign internal doses from radioactive material in the general environment, in accordance with the Mound Occupational Environmental Dose TBD, (ORAUT-TKBS-0016-4).

Measured air concentrations are useful for estimating maximum doses when bioassay data are unavailable. Performance of routine air monitoring was a feature of the Mound health physics program since the beginning of Mound operations. Air sample results are available in at least summary form for the years 1949 through 1954. This information will be integrated into the revision of the Mound Occupational Internal Dosimetry TBD. In some cases, this information will be used to bound doses for unmonitored internal exposures, as described in Section 7.0 of this report.

7.0 Feasibility of Dose Reconstruction for the Proposed Class

The feasibility determination for the proposed class of employees covered by this evaluation report is governed by both EEOICPA and 42 C.F.R. § 83.13(c)(1). Under that Act and rule, NIOSH must establish whether or not it has access to sufficient information either to estimate the maximum radiation dose for every type of cancer for which radiation doses are reconstructed that could have been incurred under plausible circumstances by any member of the class, or to estimate the radiation doses to members of the class more precisely than a maximum dose estimate. If NIOSH has access to sufficient information for either case, NIOSH would then determine that it would be feasible to conduct dose reconstructions.

In determining feasibility, NIOSH begins by evaluating whether current or completed NIOSH dose reconstructions demonstrate the feasibility of estimating with sufficient accuracy the potential radiation exposures of the class (discussed in Section 9.0 of this report). If the conclusion is one of infeasibility, NIOSH systematically evaluates the sufficiency of different types of monitoring data, process and source or source term data, which together or individually might assure that NIOSH can estimate either the maximum doses that members of the class might have incurred, or more precise quantities that reflect the variability of exposures experienced by groups or individual members of the

class as summarized in Section 3.0. This approach is discussed in OCAS's SEC Petition Evaluation Internal Procedures which are available at <http://www.cdc.gov/niosh/ocas>.

The next four major subsections of this Evaluation Report examine:

- The sufficiency and reliability of the available data. (Section 7.1)
- The feasibility of reconstructing internal radiation doses. (Section 7.2)
- The feasibility of reconstructing external radiation doses. (Section 7.3)
- The bases for petition SEC-00090 as submitted by the petitioner. (Section 7.4)

7.1 Pedigree of Mound Data

This subsection answers questions that need to be asked before performing a feasibility evaluation. Data Pedigree addresses the background, history, and origin of the data. It requires looking at site methodologies that may have changed over time; primary versus secondary data sources and whether they match; and whether data are internally consistent. All these issues form the bedrock of the researcher's confidence and later conclusions about the data's quality, credibility, reliability, representativeness, and sufficiency for determining the feasibility of dose reconstruction. The feasibility evaluation presupposes that data pedigree issues have been settled.

Since its inception, all Mound radiation monitoring procedures and record-keeping were carried out to comply with Federal radiation protection regulations. Each employee's accumulated radiation exposure, as measured on a continuing basis by various radiation detection dosimeter and assays, was entered into personal radiation records for permanent documentation.

Monitoring record-handling and storage has varied over time, and with changing operators. As discussed in following subsections, specific record maintenance techniques have varied between external and internal data. Individual workers' files have been diligently maintained.

In 1993, the DOE decided to close the Mound Plant pursuant to the DOE Weapons Complex Reconfiguration Program. This was an effort to realign the weapons complex into a smaller, less expensive operation. The focus during the realignment was to maintain the enduring stockpile while retaining necessary resources and sustaining weapons production competency. Records generated in support of past missions were transferred to various receiver sites, or dispositioned per the National Archives and Records Administration (NARA)-approved retention schedules. Receiver sites include the Kansas City Plant, Savannah River Site, Los Alamos National Laboratory, Sandia National Laboratory, associated DOE Operations and Field Offices, the DOE Historian's Office, and the Office of Scientific and Technical Information (OSTI). Transfers of documentary materials also required transfer of document ownership and maintenance responsibilities in order to preserve the existing information assets of the weapons production complex. Details of these records transfers are provided in *Mound Records Transfer History* (Long, 2007). In addition, a description of Mound records disposition to LANL (a petition basis) is included in Section 7.4.1.7.

DOE has completed environmental remediation and restoration of all but one Operable Unit at the site. In May 2006, responsibility for managing Mound records was transferred to the Stoller Corporation/Source One Management contracting team, with oversight by the DOE Office of Legacy Management (DOE/LM).

Upon request (and as applicable), the Stoller Corporation/Source One Management contracting team provides employees' original hardcopy records in addition to database printouts (prior to 1958), which ensures the ability to confirm data. These hardcopy records are in the form of various preprinted forms, cards, or reports (depending on what was in use at the time). Per *Dose Reconstruction Training*, ORAUT-TRNG-0051, when performing dose reconstructions, personnel performing dose compare available hard copy data with database printouts.

The history and general quality of available Mound monitoring record data sets are summarized in following subsections. Dosimeter performance, bioassay procedures, and the QA/QC procedures associated with various monitoring campaigns were quite extensive at Mound and have been described in several documents. The ORAUT internal and external TBDs (ORAUT-TKBS-0016-5, ORAUT-TKBS-0016-6) provide some details. Extensive details of procedures and their evolution are contained within Meyer's external monitoring and bioassay history documents (Meyer, 1992; Meyer, 1994).

7.1.1 Internal Monitoring Data Review

Unless otherwise noted, the following characterizations of Mound internal data have been taken from three documents describing work performed for the Pre-1989 Dose Assessment Project (MJW, 1998; MJW, 2002, Phase I; MJW, 2002, Phase II). Internal monitoring data collection and assessment was a primary goal of Phase I of that project. Below is a summary of more detailed information available in the documents referenced above.

Plutonium Bioassay Data

The PURECON database was established in 1991 by the University of Lowell Research Foundation. This work was undertaken to meet the requirements of DOE Order 5480.11, *Radiation Protection for Occupational Workers* (DOE, 1988), which became effective January 1, 1989. A document entitled *Plutonium Historical Dose Reconstruction Program* provided the historical backdrop for this effort (Meyer and Reeder, 1992). In brief, Mound staff recognized that it needed to develop more reliable internal dosimetry record-keeping with respect to plutonium, which resulted in building the computer database from the original raw data.

As noted above, QA/QC and repair work has been performed on the PURECON database by MJW during its work on the Pre-1989 Dose Assessment Project (MJW, 2002, Phase I; MJW, 2002, Phase II). During its initial assessment of the existing database (5% check), MJW noted that for all PURECON records checked for errors of all types, there was an 8.2 % error rate was observed. This was considered unacceptable because some of these errors dealt with misidentification of bioassay data that could directly affect the results of the MJW dose screening program. Details of these checks are provided in the Phase I Report, Volume I, Appendix II-2 (MJW, 2002, Phase I).

Also provided in Volume II, Appendix A, Subpart 2 of the Phase I Report, is a memo submitted to Mound in September 1997 with recommendations regarding assessment and repair of the entire PURECON (and tritium) databases. The recommendations were approved and a description of the work performed is discussed in Section II(C)(1) of Volume I. In essence, a test plan was devised that allowed continued testing of the PURECON database against a predefined set of test conditions (derived from a proposed Pu-screening algorithm) until a zero error condition was returned.

Questionable results were all checked against original logbook entries. All database alterations identified by the test plan implementation were documented on Form TPOOL-I, MESH Record Quality Assurance Form.

In July 1999, approximately 350 (8 ½" by 11") "KARDEX" cards were discovered among the miscellaneous bioassay records in the Mound Occupational Radiological Exposure (MORE) records cabinets. The existence of these data was mentioned in the Meyer bioassay history document (Meyer, 1992). A thorough search of the record archives revealed their existence. The Meyer document also noted that the KARDEX data were the correct results and should replace any logbook data entered for that time period. Analysis of this new information showed that the KARDEX data took into account background that the logbook entries for the same period did not.

The approximately 2300 data points for 238 individuals for the time period 1960-62 were entered into an Excel spreadsheet, and the pCi value for a 24-hour sample was calculated. This information was then printed out for each individual and placed, along with a copy of the original KARDEX data, in the identified individual's Phase II data packet. In addition, the database was updated to include all new KARDEX data.

In general, the KARDEX data were calculated to be 0.1 to 0.2 pCi lower than the data in the PURECON database for the period 1960 through 1962. In several cases, existing PURECON data that were >MDA were calculated using the new KARDEX data to be <MDA. The net effect of updating the PURECON database with the KARDEX data has been to take into account background data for the period of 1960 to 1962, thus lowering the net result. Comparison of the PURECON database with the KARDEX data for 1962 showed that the majority of results in PURECON had been entered correctly.

As detailed in the Pre-1989 Dose Assessment Project Phase I Final Report (Volume I), the PURECON database for Pu was thoroughly reviewed for errors. A complete QA review of the database was required based on an initial random check of 5% of the existing data. This 100% QA effort corrected approximately 2347 errors in 58,893 records, for an error rate of ~4%. All database corrections were recorded. The corrected database was given one additional QA review following completion of all additional data entries; the person performing the initial data entry did not perform the final database QA. During all PURECON database work, the database was maintained on a secure network server located at the MJW offices.

Polonium Bioassay Data

The Po bioassay database for Mound employees contains 207,750 individual sample results spanning from 1944 to 1973. Code-named PORECON, it was created from polonium data cards contained in individual dosimetry files located in MORE records. Since these data cards were transcribed from original logbooks, QA of the database took two forms. The first was the double-key entry process, whereby a data clerk entered the "card" data into a database and a different data entry clerk made a second independent entry. The database creation program automatically checked the two entries and alerted the second clerk if a discrepancy was present. When a discrepancy occurred, the second clerk was required to alert MJW supervisory staff. The supervisor interpreted the data and corrected the discrepancy, at which point the program accepted the data.

Once the database was complete, the second phase of QA was initiated. Supervisory staff compared the results of all 24-hour urine samples entered into the database with the original hard copy logbook results. These samples were chosen for 100% review because 24-hour samples were typically collected following a known or suspected intake, and therefore represented some of the larger results. In addition to this review, 1% of the remaining records were compared to the hard copy results. The goal was to verify that there was less than a 1% error rate in the database construction. If a larger error rate had been found, additional QA would have been performed.

As this data comparison was performed, it turned up gaps of a few weeks to several years in the data of several individuals. This was unusual because samples were typically collected on a weekly basis. These gaps were researched using Microsoft Access to identify gaps by a preset time period such as 30 days, 60 days, etc., up to one year. These data gap printouts showed the length of the gaps, and potentially, the data that were absent. Examples of a data gap printout are shown in Appendix D of the Phase I Final Report (MJW, 2002, Phase I). The data gap research also helped identify those periods of potentially-missing data in an individual's file so that the paper records of weekly reports and logbooks could be searched for the occurrence of a particular name. It should be noted that for the early Po records, only the person's name was used as a means of record identification. In many instances, the name was not complete; in a few cases, only nicknames were entered. Consequently, it is unknown if all records for an individual were reconstructed correctly in that regard.

Once the initial Po database entry work was complete, MJW turned its attention to additional sources of Po data that had not been previously identified. As was previously discussed, the original Po logbooks were consulted throughout the Po data entry process to resolve conflicts found on the Po cards. As a result of continuing to consult these logbooks, additional data were discovered that had never been captured on Po data cards. These new data were input into the Po database as they were discovered.

Additional data added to the PORECON database came from a 3-ring binder containing two sets of 19 microfiche discovered in historical file drawers. Labeled "Po-210 Historical Exposure Data," the data entered on the fiche contained the worker's name, SSN, and Po bioassay data consisting of the sample date and result. Because the origin of these data was unknown, they were treated as potential information which may be missing from the PORECON database. Therefore, a 100% check of the fiche data against the PORECON database was performed. The results showed that a few persons listed on the fiche were not included in the database. They also showed that, for several individuals, the fiche contained more sample information than the database. Finally, in a few instances, the fiche data were in conflict with the database information. In this case, the original Po logbooks were again consulted to resolve any conflicts.

Almost from the inception of the Pre-1989 Dose Reconstruction Project, there were reports by former Mound staff of human bioassay data present in original logbooks sent for classified storage at the Los Alamos National Laboratory (LANL). Discussions were initiated between DOE Mound and DOE LANL in October 1997 regarding a limited search of the Mound logbooks. After several months of discussion, MJW staff spent two days at LANL in March 1998 reviewing approximately 230 classified, potentially radiologically-contaminated logbooks. The results of this review showed that about 10% of the logbooks examined contained human bioassay results for polonium. An additional 5% of the information gathered was also related to Po research, such as nose wipe data, blood sample data, fecal sample data, and various animal studies. Additional discussions were then held between

Mound DOE and LANL DOE to retrieve a selected number of Mound logbooks. A total of approximately 1500 logbooks were returned to Mound following declassification. A complete review of these declassified records was performed and the results of this additional work showed that only about 5% of these logbooks contained human bioassay results for Po with some additional animal data.

After the polonium logbook material from LANL had been declassified and reviewed by MJW staff, Mound staff discovered that not all pertinent Po records had been sent to LANL. Several thousand additional logbooks located on site were identified as potentially containing project-relevant material. Once the scope of the project was defined and funded, a review of the classified records in the logbooks was begun. Five Q-cleared individuals working part-time reviewed approximately 5,300 logbooks. Again, approximately 5% of the logbooks provided information relevant to human Po bioassay data while an additional 5% of the information retrieved related to animal studies using various Po compounds.

It was discovered during MJW's review of logbooks and microfiche that all of the data found in the Mound logbooks retrieved from LANL was recorded on the microfiche. It is likely, therefore, that in reviewing all of the microfilm at Mound related to Po bioassay data, all available data have been reviewed regardless of the location of the hardcopy information.

Tritium Bioassay Data

Mound tritium data reside in the MESH database. Initial review of the data by MJW during the Pre-1989 Dose Reconstruction Project revealed that records entered into the system from 1957 until 1982 only listed the year, the person's social security number (SSN), and a dose in rem. Database information from 1982 to the present consisted of the original tritium bioassay analytical data with sample dates, in addition to the information listed above, with the exception that no annual dose is given in any post-1981 records. No documentation was located in the historical files that described the algorithm used to calculate the dose reported in the database for the earlier years. However, the bioassay methods used throughout the tritium monitoring period, as well as the associated detection limits and accuracy, are known (Meyer, 1992). As noted by Meyer, "urine sampling counting for tritium has been automated since the early days of tritium work and the processing of the data has been handled by computer for many many years...The calculation of whole body exposure has been a routine procedure in tritium dosimetry."

Except for the years 1976 and 1977, primary data for tritium bioassay results are available. Workers involved with the Pre-1989 Dose Reconstruction Project located and used original logbook bioassay data for the highest-exposed employees (pre-1982) for tritium dose algorithm development. The format used for recording primary (and secondary) tritium records has changed many times through the years of tritium bioassay. The tritium dose records available to the dose reconstructor consist, with rare exceptions, of information in the MESH database. Tritium dose records in MESH contain annual totals through 1981, and actual bioassay results for 1982 and after. Dose reconstruction is based on the 'recording level' of 6 $\mu\text{Ci/L}$ through the year 1995 unless individual bioassay results (zero or non-zero) are provided. Positive recorded annual doses are modified with the correction factor in accordance with Equation 5-4 in the Mound Occupational Internal Dosimetry TBD (ORAUT-TKBS-0016-5). If the modified dose is greater than the missed dose, based on the recording level, modified dose is assigned. If the missed dose is greater, then missed dose is assigned.

“Other Radionuclides” Bioassay Data

For the purposes of this report, “other” radionuclides are defined as radionuclides other than tritium, Po-210, or plutonium isotopes. Bioassay data for other radionuclides were collected from several sources and compiled into Excel spreadsheets as part of the Pre-1989 Dose Reconstruction Project. Unlike the plutonium (PURECON) database or the polonium (PORECON) and tritium databases, which were created from fairly well-organized individual dosimetry records, the “other radionuclide” information was generally very poorly-documented and the interpretation of the bioassay results were often at best scientific approximations. It appears that because the activities involving the other radionuclides were not large-scale operations, the documentation of associated bioassay sample information was secondary to the larger plutonium, polonium, and tritium sampling and analysis programs.

Logbooks served as the primary source of information MJW used to construct the Excel spreadsheets. Additional results came from Kardex files. A total of 215 records were found in, and extracted from, the PURECON database. The curium and americium data found in PURECON represent the only data discovered to date for those radionuclides.

Difficulties encountered in attempting to interpret available bioassay records are noted in a paper entitled *MJW Corporation Position on “Other” Radionuclides for the Pre-1989 Dose Assessment Project* (MJW, 2002, Phase II). MJW notes therein that gross alpha counting was used to obtain the available results. Some of the results were not associated with a name, social security number, or health physics number. Often, there were no units associated with a result. In many cases, there were results for an element such as radium or thorium, but it was unclear which isotope was intended. There was no information on the age, solubility, or chemical form of the elements. In some cases, it appears bioassay results were repeatedly reported for two, or sometimes three, different radionuclides. For example, a person may have identical results for protactinium and Th-232. In other cases, urine samples may have been analyzed for radium/actinium/thorium by differential decay analysis of the radium fraction. The same urine sample may have also been analyzed for Th-232 by doing a Ra-Th separation. The results of the differential decay analysis appeared to conflict with the Th-232 analysis in that the dominant radium isotope is Ra-223 whereas Ra-224 would be expected. This would seem to indicate that the thorium results should have been interpreted as Th-227.

The methodologies used to reconstruct dose for these radionuclides are discussed in Section 7.2.1.4.

7.1.2 External Monitoring Data Review

After polonium operations began in February 1949, the results of the pocket dosimeter measurements, film badge readings, and neutron doses were entered in each employee’s radiation exposure record on Form 1015-X, which remained in use until December 1959. Beginning in May 1959, neutron exposure data were entered on punch cards and processed by the External Exposure Analysis System (EXAS) program. Beginning on January 2, 1960, results of both photon and neutron monitoring film were entered on punch cards (Meyer, 1994, Volume I, 1960 Appendix I, pp. 133–138). After that time, dose data based on film measurements were entered on Form 1015-X.

Beginning in March 1963 pocket dosimeter results were entered into a file-card system. The use of punch cards for recording pocket dosimeters ended, and a Kardex file cabinet was purchased for the

file cards. The file cards were used from March 25, 1963, until December 27, 1963 (Meyer 1994, Volume I, 1963 Appendix III, p. 263). Beginning on December 30, 1963, pocket dosimeter data were entered on Form 1333. This form, which permitted the use of a Rolodex V-File for more efficient handling of daily records, remained in use through May 1966.

The External Radiation Analysis Data (ERAD) program replaced EXAS in 1978, and the Mound Environmental Safety and Health (MESH) program replaced ERAD in September 1989.

The MESH database contains all measured employee radiation doses since 1947, although only the annual summary dose is available for years before 1977. Annual doses are sufficient for overestimation of employee doses; however, the lack of individual dosimeter cycle data requires claimant-favorable assumptions to calculate missed external doses. *Missed* external dose is the potential dose received by an individual below the technological limit of the dosimeter to detect (called the limit of detection, or LOD).

Early neutron dose measurements were made using neutron track emulsion, Type A (NTA) film. These film dosimeters likely responded in a manner proportional to the doses received for early operations at Mound, resulting in neutron doses due to the relatively high-energy spectrum associated with neutrons from Po-Be sources. Other operations had lower average-energy neutron spectra.

Obviously, many changes have occurred over time with regard to Mound's dosimetry program and record-keeping practices. As described by Meyer, the need for a "some day in the future" capability for total program reconstruction was not a well-defined "need," especially in the early decades of operation (Meyer, 1994). In practice, maintaining controlled record storage was more of a challenge than developing the records themselves. Nevertheless, a large number of documents describing the program and dosimetry performance are available. After evaluating these, NIOSH identified no significant administrative practice that would jeopardize the integrity of the recorded external dose. Many of these documents are referenced in ORAUT-TKBS-0016-6, incorporated into the *History of Personnel External Dosimetry Program at the Dayton Project and Mound Laboratory 1946-1993* (Meyer, 1994), and in the SRDB. Program descriptions and assessments for later years are also available in the SRDB.

7.2 Internal Radiation Doses at Mound

The principal source of internal radiation dose for members of the proposed class would have been inhalation and ingestion of radiological contamination during the following operations:

- Research and development (R&D) of fabrication of neutron sources for nuclear weapons initiators and neutron sources for other uses
- Research for alternatives to Po-210 for use in weapons initiators (because the short half-life of Po-210 required the frequent re-manufacture of the initiators)
- Radioisotope thermoelectric generators (RTGs) and radioisotope heat sources, which have been used on a variety of missions to provide heat and electric power
- Tritium-handling technologies that supported weapons and non-weapons programs

- Research on metal tritides and tritium targets
- Recovery and purification of tritium from waste generated by Mound and other DOE sites
- Research into production of alternative reactor fuels such as thorium
- Research and development of the joining of exotic metals
- Research and development of technologies for radioactive waste management

The potential internal sources would have been dependent on the operational area and activities. The major sources of intakes have been polonium, plutonium, and tritium. Bioassay monitoring was typically conducted for the radionuclides determined by the site radiation protection program to be of primary dosimetric concern.

Mound listed the following radionuclides as primary radionuclides because they could deliver relatively high doses to human receptors, had widespread use at the site in multiple buildings and facility processes, and had sufficient site documentation to evaluate internal dosimetry. Tritium was included due to potential absorption via hydrogen exchange across the skin barrier. (ORAUT-TKBS-0016-5)

- Po-210
- Pu-238
- Pu-239
- Pu-240*
- Pu-241*
- Pu-242*
- Pa-231
- H-3

* Pu-240, Pu-241, and Pu-242 are not dosimetrically significant.

Radionuclides of secondary concern to Mound staff were assessed with limited internal dosimetry data due to the limited worker exposures. Short-lived radioactive gases and their respective daughter products were generated at Mound by activities involving uranium and thorium chain extraction and separation activities, as well as by the manufacturing of sealed sources. Exposures to these gases were minimized by a ventilation system installed in 1980 and were largely restricted to the SW building where radium and actinium work took place. The following are the secondary radionuclides in addition to daughter products from the uranium and thorium decay chains:

- Am-241
- Cm-244
- U-238
- U-235
- U-234
- U-233
- Th-232
- Th-230
- Th-228

Comparison results to quantify "short" and "long-lived" radionuclides or specific measurements of "Short-Lived Daughter Products" are contained in health physics periodic reports starting in March 1952.

7.2.1 Process-Related Internal Doses at Mound

The following subsections summarize the extent and limitations of information available for reconstructing the process-related internal doses of members of the proposed class. More detailed information on the individual topics can be found in Section 6.1 of this report and in (Meyer, 1992) and (King, 1995).

7.2.1.1 Tritium

Extensive use of tritium began at Mound in the mid-1950s, and some limited exposure may have been possible prior to that time. Most of the tritium exposure at Mound was assumed to be related to the uptake of tritiated water (HTO), which is effectively monitored using urine bioassay. Tritium dose assessments at Mound were reliably measured using standard assessment methodologies starting in 1957. Measured doses are modified to reflect current dose models as discussed in Section 5.3.1.1 in the Mound Occupational Internal Dosimetry TBD (ORAUT-TKBS-0016-5). Recommended doses for unmonitored exposures are also provided in the referenced section. The quantity and quality of available tritium urinalysis results are sufficient for estimating maximum doses or precisely estimating doses.

7.2.1.2 Polonium-210 Operations

Full-scale separation of Po-210 from irradiated bismuth took place on the second floor of the T Building from 1949 to 1971. Facilities and activities included neutron source calibration, decontamination laboratories, a storage pool for irradiated bismuth slugs, neutron source processing, and analytical laboratories. Po-210 was also present in Building HH from 1949 to 1959, generating sludge materials with 0.02 Ci/l total alpha activity. Use of Po-210 in the R Building involved research and electrodeposition studies from 1948 to 1951, and the manufacturing of Po-Be neutron sources from 1956 to 1961. Po-Be sources were first manufactured at Mound as neutron source initiators to support various weapons programs. Polonium was later used to produce Po-210 heat source generators (King, 1995). Intakes of polonium and the resulting dose may be calculated using bioassay data that existed as early as 1944.

The SW Building was used for counting Po-210 sources, neutron source measurement, source strength verification, and Po-209 and Po-210 retrieval. Aqueous wastes containing Po-208, Po-209, and Po-210 were present in the WD and WDA Buildings beginning in 1949. Chemical forms included polonium nitrate and polonium chloride (Meyer, 1992).

As discussed in Section 6.0 of this report, MJW placed Po-210 bioassay data in the PORECON database during the Pre-1989 Dose Assessment Project after evaluating individual dosimetry files from original logbooks and data cards. PORECON contains over 207,750 individual sample results spanning from 1944-1973.

These data may be supplemented with available process information to estimate a reasonable bounding dose.

7.2.1.3 Plutonium

Pu-238 is the primary radionuclide of concern with respect to internal dose at the Mound site beginning about 1959. The first production RTG, the SNAP-3A, was built in 1958 using Po-210 alpha decay as a heat source. President Eisenhower used the current to generate a radio transmission from the Oval Office in 1959. Subsequently, the SNAP-3 was redesigned to use Pu-238 in order to extend the life of the generator. The SNAP-3B was first launched in the Navy *Transit* satellite program.

Production of Pu-238 was a large-scale project, eventually using the SM and PP buildings, and extending from 1959 through the late 1970s. A number of material forms were used, including Pu-238 metal, plutonium oxide, plutonium dioxide, and plutonium metal ceramic (cermet). The generator projects included a number of spacecraft power sources for satellites, the Apollo program, and planetary and interstellar space exploration programs employing the Pioneer and Voyager spacecraft. Other sources were fabricated for use in buoys, for potential use in pacemakers, and in diving suit heat sources. Production efforts were reduced in the period of the 1970s. During this time, encapsulation of the Pu-238 was moved to the Savannah River Site, and after 1979, unencapsulated Pu-238 was not routinely handled at Mound. The program had an indeterminate status for a number of years, but operations with RTG fuel were officially moved to the INEEL site in 2006.

The Mound site featured only limited exposure to weapons-grade plutonium in small-scale research operations and the preparation of a small number of neutron sources. Weapons-grade Pu-239 used in the Mound plutonium neutron source project (R building, 1956-1958) was reported to be over 95% pure by mass, with trace amounts of Pu-240 and Pu-241, which are not dosimetrically significant (King, 1995). Additional information on Pu-239 feed material characteristics can be found in the Mound site profile.

Plutonium bioassay results are available from 1956 through 1991 in the PURECON database. Subsequent plutonium internal dose monitoring results are listed in the MESH database. Early results were based on gross alpha measurements, and the resulting doses must be calculated based on the potential exposure. Later measurements (1980 and after) were isotopic for Pu-238 and Pu-239. These data may be supplemented with available process information to estimate a reasonable bounding dose.

7.2.1.4 Other Radionuclides with Bioassay Monitoring Data

The Mound site conducted diverse activities in research and chemical engineering; a number of which are discussed in Sections 6.1.4 through 6.1.10. Each process is summarized below with respect to methodology used to reconstruct internal dose.

- Protactinium-231, 1954-1958: This limited program featured bioassay data for the primary radionuclide beginning in 1955, and this value is used to assign missed dose as well as potential dose from intakes implied by positive results. These data may be supplemented with available process information to estimate a reasonable bounding dose.

- Thorium-230, 1954-1956: Programs involving Th-230 featured bioassay data for the primary radionuclide, and this value is used to assign missed dose as well as potential dose from intakes implied by positive results. Air activity measurements are available in periodic health physics reports specific to the ionium program. Along with available process information and bioassay data available from 1956 onward, maximum doses can be estimated, or doses can be estimated more precisely than a bounding dose estimate.
- Thorium-232, 1954-1956 (Research); 1956-1975 (Storage): Programs involving Th-232 featured bioassay data for the primary radionuclide, and this value is used to assign missed dose as well as potential dose from intakes implied by positive results. Small numbers of bioassay results are available from 1951 to 1954, with larger numbers available from 1955 through 1959. Additional bioassay data associated with the periodic re-drumming of material is available prior to and after the time the material was in the Building 21 storage basins. These data may be supplemented with available process information to estimate a reasonable bounding dose.
- Radium-226, Ac-227, and Th-228, 1949-1954 (research and production); 1955-1959 (decontamination and decommissioning): These radionuclides were part of research on production for use of Ac-227 as a substitute for polonium in neutron initiators. The decontamination and decommissioning of the building where the work was done was completed in February 1959 (Meyer, 1992, p.38). NIOSH has access to a limited number of bioassay results for these radionuclides; however, interpretation of the results is uncertain. NIOSH cannot bound the dose for the time period October 1, 1949 through February 28, 1959.
- Uranium: Processes with uranium were associated with reactor fuels research. Existing bioassay results are used to assign missed dose as well as potential dose from intakes implied by positive results. Along with available process information and bioassay data, maximum doses can be estimated or doses can be estimated more precisely than a bounding dose estimate.
- Americium-241 and Cm-244: Limited programs with these materials resulted in a small number of bioassay results. These are used to assign missed dose as well as potential dose from intakes implied by positive results. These data may be supplemented with available process information to estimate a reasonable bounding dose.

7.2.1.5 Other Radionuclides with No Bioassay Data

A number of radionuclides are described in the literature as available through direct exposure during research activities, or as part of the waste disposal system. Small quantities of a variety of radionuclides associated with research-scale activities and their progeny are available in subsequent years to decontamination and decommissioning workers, as listed in the King document (King, 1995). Like most radiation protection programs, the Mound program sampled for those radionuclides having the potential to produce the majority of the internal dose. Radionuclides were considered less significant for several reasons, including:

- Limited amounts of material and limited number of personnel exposed

- Very small doses compared with the primary dose radionuclide. For example, a spectrum of beta- and gamma-emitters associated with the irradiated bismuth feed product for the polonium refinement process is listed in King with the statement that "Polonium-210 is the major radionuclide of concern, with Zinc-65 a distant second" (King, 1995)
- Insignificant dose commitment due to a short effective half-life. An example of this would be La-140, used as a radiotracer

For Mound chemical research operations, descriptions of the process and results exist in Mound progress reports, technical reports, and in peer-reviewed journals. From these documents, the proportions and amounts of radionuclides can be determined with sufficient accuracy to estimate a maximum dose. Another source of information is air monitoring results available for some buildings and time periods.

Examples of other radionuclides for which doses will be calculated based on data other than bioassay results are listed below.

- Fission product dose from 'reactor waste' research (1949-1953). A project was conducted in the R Building to research the feasibility of removing fission products from waste streams, including the bismuth phosphate, tributyl phosphate, and the solvent extraction (Purex) plutonium separation processes. Progress reports, such as *Decontamination of Process Waste Solutions Containing Fission Products by Adsorption and Coprecipitation Methods (Information Report)* (Decon, 1951), contain detailed descriptions of the process, along with chemical composition and radioassay results. Additionally, bioassay was performed for individuals with plutonium as the indicator element. From these, maximum exposures may be determined with sufficient accuracy to determine a maximum dose.
- Separation of yttrium from strontium (1952-1954). A small research project was conducted to separate Sr-90 from its progeny Y-90 (in secular equilibrium in material aged more than 30 days). No bioassay data exist for this operation; however, a description of the chemical process exists in the document *Preparation of Carrier-Free Yttrium-90 (Yt-90)*.
- Radiotracers (1949-1954). The literature suggests that there was some potential for exposure to La-140 and Ba-140 (in secular equilibrium), which was used as a radiotracer to determine the efficiency of the separation process with lanthanum and barium modeling the chemical behavior of radium and actinium. The proportions of the radionuclides in the process material are listed in the progress reports such as *Report for Research on Substitute Materials, October 1, 1951 to December 31, 1951 (Actinium-227) (Ac-227, 1952)*. A maximum dose may be estimated for potential exposure to these radionuclides during this activity.

7.2.1.6 Radon

Beginning in 1952, sources of radon (Rn-222), thoron (Rn-220), and actinon (Rn-219) were present at Mound due to radium and thorium processing and separation of Pa-231 and Ac-227. Thorium sludge from Th-232 extraction and purification operations was stored outside in drums from 1954-66. In 1966, drummed thorium sludge was transferred to Building 21.

Table 7-1: Radon Isotope Survey Data by Building and Time Period

Building	Survey dates	Gas concentration (pCi/l)			WL	WLM yr ⁻¹ (a)
		Radon (Rn-222)	Thoron (Rn-220)	Actinon (Rn-219)		
SW Tunnel	10/12/79	88,000	28,000	640,000	n/a	n/a
SW-19 before vent	6/79-10/79	67-160				
SW-19 after vent	3/80-4/80	7.7-13.4			0.03	0.4
	12/89	2.6	Not Detected			
	12/99	1.0-5.8^b				
	4/00	0.7-7.2				
	1998-2000	5.8-12				
SW-21	5/83	17.5-52.8	n/a	n/a	n/a	n/a
	12/89	34-118		0.3-0.7	0.4-1.3	4.7-15.3
	4/90-6/90	117-161			0.85	10.0 median
		125			median	
SW-22	6/90	125	n/a	n/a	n/a	n/a
SW-48	12/89	3.2	n/a	n/a	n/a	n/a
Old SD	12/89	1.5-2.4	n/a	n/a	n/a	n/a
Fire station	12/89	1.2-1.4	n/a	n/a	n/a	n/a
Paint shop	12/89	0.9-1.2	n/a	n/a	n/a	n/a
A	10/88-2/89	0.1-1.1	n/a	n/a	n/a	n/a
All other buildings	12/89	5 0.4-0.9	n/a	n/a	n/a	n/a
Outside facilities	5/83	0.24-0.59	n/a	n/a	n/a	n/a
Reported background		0.1 to 2.1 Average = 0.5	n/a	n/a	n/a	n/a

a. Working level months per year (WLM yr⁻¹) were determined as WL (2000 hr yr⁻¹) (1/170 hr WLM⁻¹).

b. Bolded concentrations were derived from charcoal canister measurements.

The SW-19 Building had elevated radon concentrations emanating from radium and thorium processing wastes. On October 12, 1979, inert gas concentrations in the SW Building underground tunnel were measured at 88,000 pCi/l Rn-222, 28,000 pCi/l Rn-220, and 640,000 pCi/l Rn-219. A Rn-222 concentration of 88,000 pCi/l would correspond to 352 WL, assuming an ICRP 50 indoor mean radon daughter equilibrium factor of 0.45 (ICRP, 1987). The tunnel was not an occupied work area; however, elevated concentrations of radon were transported from the tunnel into SW-19 work areas. Measurements of Rn-222 near an employee's desk ranged from 67 to 160 pCi/l in 1979.

A ventilation system was installed in early 1980 to vent SW Building tunnel air (Meyer, 1992). This system reduced Rn-222 concentrations in SW-19 by a factor of 10 or more. This result was confirmed with continuous measurements from 7.7 pCi/l to 13.4 pCi/l. A working level (WL) measurement by

the employee's desk following ventilation system installation was 0.03 WL or 0.03 (12 mo/yr) = 0.4 working level month (WLM) compared with an occupational limit of 4 WLM/yr (King, 1995).

A DOE radon study was conducted from December 12-15, 1989, to measure radon in various Mound buildings (UNC Geotech, 1990). The majority of buildings had radon concentrations below 1.0 pCi/l Rn-222, except SW and Old SD buildings. In June 2000, a radon study summary report was issued based on 1990 and 1999 measurements (BWXT, 2000). Mound site radon background was reported to be 0.5 pCi/l with a range of 0.1 to 2.1 pCi/l.

SW-19 was the only building at Mound identified as an area of potential occupational exposure to Rn-222 and Rn-220 (King, 1995). Rn-220 and Rn-219 measurement results were very limited despite the high concentrations observed in the underground tunnel. The only Rn-219 measurements were made in Building 21 at 0.3 to 0.7 pCi/l, but the holding time before analysis was excessive compared to the four-second half-life of Rn-219. The only Rn-220 measurement in SW-19 was below detection. Rn-220 and Rn-219 exposures would not be detectable in excreta by bioassay due to very short half-lives. (ORAUT-TKBS-0016-5).

The WLM values in Table 7-2 have been used to reconstruct doses for EEOICPA claimants suspected of having been exposed to radon in air. All WLMs have been assumed to be median values of lognormal distributions with a geometric standard deviation (GSD) of 3.0.

To reconstruct missed doses, a background radon concentration of 0.5 pCi/l can be used, which converts to 0.03 WLM indoors assuming 100% occupancy and 0.45 (ICRP, 1987).

Building conditions	Period	Radon (pCi/L)	Radon (WL)	Radon (WLM)
SW Tunnel Prior to Ventilation	1949-1979	88,000	352	4,100
SW-19 Ra-Ac Pilot Project	1949-1952	160	0.72	8.5
SW-19 Ra-Ac Old Cave Production	1952-1960	160	0.72	8.5
SW-19 Post Production, Prior to Ventilation	1961-1979	160	0.72	8.5
SW-19 Post Production, Post to Ventilation	1980-1995	0.7-13.4	0.03	0.4
SW-21	1952-1995	17.5-125	0.85	10.0
SW-22	1966-1995	125	0.56	6.6
SW-48	1980-1995	3.2	0.01	0.2

Descriptions of radiation protection activities in periodic health physics report demonstrate that the health physics program was considering short-lived air activity to the extent that this activity was routinely reported through the era of radium and thorium processing, and Pa and Ac separation. For periods outside these years, and for which air concentrations are not available, doses may be estimated based on the measured air concentrations and scaled based on the available source term, as determined in the available process information. Maximum exposures may be determined with sufficient accuracy to determine a maximum bounding dose.

7.2.1.7 Missed Internal Dose

Missed dose is calculated using bioassay data specific to individuals and represents dose from intakes that could have been received, but were not detected by the bioassay method used (urinalysis in most cases for Mound). Missed dose is assigned based on the minimum detectable amounts (MDAs) for each radionuclide and the bioassay method listed in the Mound Occupational Internal Dosimetry TBD (ORAUT-TKBS-0016-5). Missed dose is applied only for monitored individuals. Doses that may have been received, but for which no dose monitoring was performed, are more properly termed "unmonitored dose." Some employees may have received unmonitored exposures to radioactive material. Doses for these individuals may be bounded using process information in the technical reports on Mound research, measured air concentrations, or a combination of the two.

7.2.1.8 Decommissioning and Decontamination

Contractors responsible for performing decommissioning activities were responsible for developing and implementing radiation control programs consistent with DOE requirements in 10 CFR pt. 835. These contractor programs included provisions to monitor external and internal personnel radiation exposures. The potentials for radiation exposure during decommissioning were generally significantly less than those during Mound production operations, and monitoring programs were commensurate with the specific decommissioning operation being performed. Data collected included air monitoring, bioassay, and external exposure monitoring. Personnel monitoring results were provided to the contracting DOE office and included in individual claim files and comprise the external and internal dose monitoring results for each individual. The internal data for these personnel can be extensive in terms of the number of radionuclides for which bioassay was conducted.

7.2.2 Ambient Environmental Internal Radiation Doses at Mound

Unlike some of the other major DOE facilities, Mound did not generally experience significant site-wide ambient contamination, and there was less concern about the potential for internal dose related to ambient working conditions. Nevertheless, the use of facility ambient air monitoring data for purposes of assessing internal radiation doses was evaluated for purposes of performing EEOICPA dose reconstructions. Except for some data for airborne radon and tritium, use of these data was not considered a viable approach due to unknown factors potentially affecting the representativeness of actual breathing zone air concentrations. Personnel ambient exposure/dose is accounted for in the available monitoring data for those personnel and these data can be used to bound the ambient/environmental doses. Further evaluation of these exposures was not performed or required for this evaluation report. In any case, the existing Mound air monitoring data are currently contained in broadly-dispersed record sources.

7.2.3 Internal Dose Reconstruction

For the period October 1, 1949 through February 28, 1959, NIOSH has determined that internal doses from Ra²²⁶, Ac²²⁷, and Th²²⁸ associated with the separation operation in SW-19 cannot be determined with sufficient accuracy. This is based on the following factors:

1. NIOSH has access to a limited number of bioassay results for these radionuclides; however, interpretation of the results is uncertain (MJW, 2002).
2. While it is likely that the bioassay results relate to the workers directly involved in this operation, it is not known what fraction of those workers was sampled.
3. There is strong evidence that airborne contamination was produced by this operation, and that this contamination was spread beyond SW-19 to other areas in R and SW Buildings. This situation created significant exposure potential among R and SW Building workers for these radionuclides. The limited number of individuals for whom Ra-Ac-Th bioassay results are available suggests that the larger population in the R and SW Buildings were unmonitored for potential intakes.
4. The reported airborne contamination concentrations throughout R and SW Buildings are relatively high in some cases, suggesting the potential for non-trivial intakes and consequent internal doses.

While it is likely that significant exposure potential resulting from this operation was limited to the R and SW Buildings, it is not clear as of this writing whether access to these buildings was strictly limited to the personnel regularly working in them.

7.2.4 Internal Dose Reconstruction Feasibility Conclusion

Potential for radionuclide intakes existed at Mound. Mound sought to limit internal exposures and maintained a progressive bioassay program throughout its operational history. NIOSH has both demonstrated that employees with the greatest potential for internal intake were monitored, and determined that the available bioassay data can be used to reconstruct or bound potential internal radiation doses for those employees, with the exception of those workers who may have been exposed to Ac-227, Th-228, and Ra-226 from October 1, 1949 through February 28, 1959.

NIOSH can bound the doses arising from exposure to polonium, tritium, plutonium, radon, protactinium, Th-230, and Th-232, uranium, and stable metal tritides using the scenarios described in the previous sections.

NIOSH has established that unmonitored intakes of radionuclides associated with radium-thorium-actinium processing, and purification research and production, may have resulted in unmonitored doses to research and process workers, and workers incidentally exposed in these facilities. For this reason, a class of workers is being proposed for addition to the SEC. For the other periods of Mound site operations, NIOSH has access to sufficient information to either estimate the maximum internal radiation dose for every type of cancer for which radiation dose are reconstructed that could have incurred under plausible circumstances by any member of the class; or estimate the internal radiation doses to member of the class more precisely than a maximum dose estimate.

7.3 External Radiation Doses at Mound

The principal source of external radiation doses for members of the proposed class is associated with Po production operations, which moved from the Dayton Project to the Mound Site in 1949. The narrowly-focused Po production work expanded to the development and production of weapons components. Production of Pu-238 and Pu-239 grew from the early Po work. The principal Mound mission was the research, development, and manufacture of non-nuclear explosive components for nuclear weapons that were assembled at other sites. Research and development included the fabrication of neutron and alpha sources for weapons and non-weapons use. Starting in the 1950s, Mound developed radioisotope thermoelectric generators (RTGs) which have been used on a variety of missions to provide heat and power for spacecraft. Po-210 production declined in the 1960s and was phased out in 1971 (ORAUT-TKBS-0016-2).

External dose monitoring formed a part of personnel protective practice from the early days at Mound, starting with the first operational process, polonium neutron source preparation. External dose monitoring continued throughout Mound's operational history. It is known that employees at the Dayton Laboratory (Units III and IV) were unmonitored for neutron dose; however, neutron dose monitoring forms a part of most early dose monitoring records in Mound employee files. These results reflect measurements with neutron-track emulsion (NTA, for neutron track, type A) which, in contrast with measurements at other sites during that era, likely provided a proportional estimate of neutron doses in the spectrum generated by Po-Be sources. Later measurements were made with thermoluminescent dosimeters (TLDs).

Photon dose monitoring was conducted from the onset of Mound operations using standard film dosimeters and, later, TLDs. Film and TLD dosimeters provided reliable measurements of the photons in Mound work areas. Shallow doses, from beta-emitters and low-energy gammas, were detected on a portion of this dosimeter as well.

7.3.1 Process-Related External Radiation Doses at Mound

The following subsections summarize the extent and limitations of information available for reconstructing the process-related external doses of members of the proposed class.

7.3.1.1 Radiation Exposure Environment

The external dose received by Mound workers was a function of the physical location of the workers on the site, the processes taking place, the types and quantities of material present, and the time spent at each location. Most doses for Mound processing personnel resulted from a mixed field of photons and neutrons. Beta doses or doses from low-energy photons were present in some workplaces. Breakdowns of the workplace radiation field characteristics are given in the relevant tables in the Mound Occupational External Dosimetry TBD (ORAUT-TKBS-0016-6).

The primary sources of external dose at the Mound site are the two major production programs involving polonium and plutonium. Tritium is not a source of external radiation dose. Laboratory dose rates could also result in significant external doses, depending on the process and the amount of material. Photon and neutron doses have been reliably measured using film dosimeters from the first days of Mound operations. A summary of the characteristics of the major external dose sources is presented below:

- **Polonium Processing:** Polonium is essentially a 'pure' alpha-emitter; however, alpha interactions within the material matrix can generate neutrons with energy proportional to the energy of the alpha particle. These neutrons' energies will be degraded through scattering and moderation. Thermal neutron interactions will include capture with emission of prompt gamma rays. Thus, the polonium production work resulted in both photon and neutron dose rates.

The average energy of the Po-Be sources fabricated for nuclear weapons and other purposes is reported to be approximately 4.5 MeV. This high average energy is measured with great reliability using the NTA film dosimeters. Photon doses were reliably measured for all Mound employees entering areas where radiation dose fields existed. NIOSH is confident that with the existing data, appropriate neutron-to-photon ratios can be determined to provide a bounding dose estimate.

Initial polonium processing efforts at the Dayton Laboratory included considerable beta dose, particularly of the extremities. The design process for the T Building, where polonium was processed at Mound, took these high levels of beta radiation into consideration. Rooms 75 and 76, where the loaded bismuth slugs were processed, were equipped with leaded windows (White Paper T, 2002) and an "elevated platform ('Rooms' 275 and 276) was used to access valves and doors by remote operations." (King, 1995, Section 6.2.50). This evidence suggests that the beta dose rates were controlled to a significant extent. That this is the reason that the site did not record beta dose readings is documented in a January 4, 1960 memorandum from the health physics supervisor, W.A. Bigler. The memo requires that open-window portions of the dosimeter film will be read "on any film where the open window is visibly darker than the rest of the film." (Meyer, 1994, Volume I, Page 250) This change was made in response to the fact that health physics personnel had noticed darkening of this portion of the film where it "had not been noted before." (Meyer, 1994, Volume I, page 164). The on-going TBD revision process will evaluate

whether an estimated unmonitored exposure will be necessary to bound doses for organs sensitive to non-penetrating radiation (i.e., skin, breast, testes, lip). NIOSH is confident that with the existing data, appropriate neutron-to-photon ratios can be determined to provide a bounding dose estimate.

- **Plutonium Processing:** Plutonium processing also resulted in mixed-field doses from photons and neutrons. Since Pu-238 was used as a heat source rather than as a neutron source (in the primary processing operation), neutron dose arose from alpha-n interactions of plutonium and its compounds. Most processing took place after the health physics program began reading and recording non-penetrating dose from beta and low-energy gamma radiation, so doses are measured for the most exposed workers.

7.3.1.2 Dosimetry Records

Records of radiation exposures from personnel dosimeters are available from the beginning of operations, and for all years of the proposed class time period. The MESH database serves as the primary electronic repository for these records. As discussed in Section 6.1, annual measured doses are available for all monitored employees. (Guido, 2003; Meyer, 1994)

7.3.2 Ambient Environmental External Radiation Doses at Mound

The ambient environmental external dose is the occupational dose received by individuals while outside operational facilities, such as process buildings. External dose from radioactive materials outside the body may be the result of direct radiation from radioactive materials in soil, from adjacent operational facilities and waste storage areas, from submersion in air containing radionuclides from effluent releases, and from re-suspension from soil. The Mound Occupational Environmental Dose TBD (ORAUT-TKBS-0016-4) and *Occupational Onsite Ambient Dose Reconstruction for DOE Sites* (ORAUT-PROC-0060) provide the historic background, rationale, and data for reconstruction of occupational environmental doses for unmonitored personnel at Mound. The conclusion from the above-mentioned references is that Mound facilities and soil are unlikely to have contributed significantly to the ambient environmental dose. In addition, the TBD evaluates external doses from submersion in air containing radionuclides released in effluents and in resuspended site soil. The annual effective air-submersion external exposures from all radionuclides in these sources during the period 1949 through 2002 were less than $5.0E-10$ Sv (ORAUT-TKBS-0016-4). The conclusion of the TBD is that submersion dose from effluents is insignificant and does not need to be considered in dose reconstruction. The ambient environmental dose would be accounted for, and bounded from, the occupational monitoring data for personnel; therefore, further evaluation of the ambient environmental dose is not necessary in this evaluation.

7.3.3 Mound Occupational X-Ray Examinations

Diagnostic X-ray procedures were a contributor to the occupational radiation exposure of Mound workers. In general, the dose from such exposures was not measured, considered, or included as part of the overall occupational exposure of the employee, although it clearly was occupationally-related. Diagnostic medical X-rays administered in conjunction with routine or special physical examinations required for employment are a valid source of occupational exposure. Unlike occupational exposures incurred during normal work processes, individual diagnostic medical X-ray exposures were not monitored, necessitating reconstruction of doses acquired in this manner. (ORAUT-TKBS-0016-3)

Mound employees received posterior–anterior (PA) chest X-rays at hiring, at specified intervals thereafter, and at termination. In 1983, a policy modification required X-rays for terminating employees only if they had not had a chest X-ray within the previous 9 months; this changed to 6 months in 1988. In 1988, a lateral (LAT) view was required for women known to have undergone breast augmentations; the frequency of these examinations is not known. ORAUT-TKBS-0016-3 lists examination frequencies over the years for different groups based on information obtained from the Mound data files. The records returned by DOE include the occupational medical X-rays performed for Mound employees. These are reviewed during dose reconstruction. Typically, the average frequency is less than one per year for most employees. Typically, dose reconstructors assume annual frequencies as an overestimating assumption.

Prior to 1980, details about the X-ray apparatus and technique parameters are not known and default values were used for entrance kerma (ORAUT-TKBS-0003). Since at least 1980, the X-ray apparatus at Mound was a stationary enclosed unit with the control panel separated from the tube head by a wall. From 1980 through 2003, the equipment consisted of a single-phase, TWX-325 control unit with a Eureka Emerald 125 X-ray tube, Eureka Linear II automatic collimator, and S&S 1417B vertical cassette holder (VCH) used with no grid and 14- by 17-in. Kodak X-O-Matic Regular film. Actual measurement data obtained by the Ohio Department of Health were used. ORAUT-TKBS-0016-3 summarizes technique parameters and entrance kerma for PA and LAT views, respectively. For the period before 1980, no external collimation was assumed when converting entrance kerma to organ doses.

Although there is no specific evidence in the history data file (Mound, 2002) to indicate the use of photofluorography at Mound, evidence suggests that General Electric mobile X-ray units might have been used at various U.S. Atomic Energy Commission, Energy Research and Development Administrations, or U.S. Department of Energy sites (NCRP, 1989). A review of files from the 1940s and 1950s reveals that when photofluorography was used, an unusually large number of X-ray examinations would be performed in a given day. Thus, a larger than normal number of X-ray records for a given day might be a positive indicator of the use of photofluorography. However, in the absence of specific data on the use of photofluorography at Mound, or even that such equipment was present on site, this analysis assumes that photofluorography did not occur at Mound. The analysis will be performed in accordance with the guidance in ORAUT-OTIB-0006, *Dose Reconstruction from Occupationally Related Diagnostic X-Ray Procedures*.

7.3.4 External Dose Reconstruction

By December 6, 2007, EEOICPA claims meeting the proposed class definition being evaluated in this report had been submitted to NIOSH. Of those 491 claims, NIOSH has completed dose reconstructions for 348 claims.

There is an established protocol for assessing external exposure when performing dose reconstructions (these protocol steps are discussed in the following subsections):

- Photon Dose
- Electron Dose
- Neutron Dose
- Unmonitored Individuals Working in Production Areas
- Medical X-ray

7.3.4.1 Photon Dose

Photon doses are reliably measured at Mound using the various dose measurement methodologies described in the Occupational External Dosimetry TBD (ORAUT-TKBS-0016-6). Correction and bias factors, as necessary, are applied in accordance with this document.

For external doses based on dosimeter results (zero and non-zero), measured doses can be estimated more precisely than maximum doses. Because individual cycle data are not available for 1977 and before, missed external doses are estimated less precisely than the measured doses. Since some information is available (e.g., routine dosimeter exchange frequencies and minimum levels of detection for Mound dosimeters), missed external doses, though overestimated, are also estimated more precisely than maximum doses. Therefore, NIOSH can bound the dose with sufficient accuracy.

7.3.4.2 Electron Dose

Electron doses are reliably measured using the "open-window" portion of the Mound dosimeters. As stated above, the Mound radiation protection program did not record the measurement from this portion of the dosimeter prior to 1960. However, when darkening of the open-window portion of the film was noted, the site program began reading the affected films. Electron doses can be estimated more precisely than maximum doses in most years at Mound; however, for years when open-window doses were not read or recorded, sufficient information is available to estimate maximum doses to the organs for which shallow dose is calculated. Therefore, NIOSH can bound the dose with sufficient accuracy.

Electron missed doses are applied in accordance with the methodology defined in the technical information bulletin *Interpretation of Dosimetry Data for Assignment of Shallow Dose* (ORAUT-OTIB-0017).

7.3.4.3 Neutron Dose

Neutron dose monitoring was identified as an area requiring improvement during operation of Dayton Units III and IV. When the polonium operation moved to the Mound site, neutron dose monitoring began after August 1949, though operations with polonium began in February of that year. The health physics program did not assume a need for neutron dosimetry prior to the beginning of dose monitoring in late 1949. Once begun, neutron dose monitoring with neutron-track emulsion was likely to measure the neutrons associated with the Po-Be sources with reasonable accuracy, based on the calibration protocol used.

Unmonitored neutron doses may be bounded using neutron-to-photon ratios based on Mound data. NIOSH also has considerable Mound NTA processing data, which provides another option to validate the claimant favorability of the neutron dose calculated using the neutron-photon ratio and the measured photon dose. Mound data includes NTA calibration with the plutonium tetrafluoride source that likely provides a neutron spectrum most similar to the neutron spectra in Mound plutonium facilities. In addition, the earlier doses determined with NTA film, once corrected for energy response limitations (i.e., the fraction of the neutron spectrum that was not measured by the NTA), can be used as another method of validation.

Calculation of missed neutron dose at Mound is more problematic than photon missed dose, which is also based on total annual doses through the year 1977. Claimant-favorable assumptions are used to overestimate the missed dose as with the photon dose; however, correction factors applied to the missed doses in accordance with the Mound Occupational External Dosimetry TBD result in a significant multiplication of the likely missed doses. For this reason, use of a neutron-to-photon ratio will likely result in a more reasonable estimate of neutron missed dose.

Given the fact that reliably-measured photon doses are associated with Mound workers, NIOSH can bound the dose with sufficient accuracy.

7.3.4.4 Unmonitored Individuals Working in Production Areas

The requirement to wear external dosimeters at Mound was based on the areas an employee accessed. This policy is described at several points in the comprehensive history of the Mound site external dose monitoring program (Meyer, 1992). Since this is the case, it is unlikely that individuals routinely entered production areas without dosimeters. Some individuals were not routinely monitored for external dose; however, they were required to use a temporary or "visitor's" badge upon entry to controlled areas. Discussion of the policies for distributing visitors' badges is also present in the external dose history. Since all workers entering radiation-controlled areas were required to wear a dosimeter, it is certain that those receiving the highest dose were monitored. For unmonitored individuals, claimant-favorable assumptions for on-site ambient doses are applied as part of the estimate.

Other information in routine health physics reports suggests that only some individuals were monitored for neutron dose. This policy may be based on dosimeters being assigned only to individuals working with neutron sources and initiators, and could result in unmonitored neutron dose from alpha-n reactions associated with Pu-238 and, possibly to a lesser degree, Po-210 in the major Mound processes. Because the workers who were monitored were the most highly-exposed, as well

as those most likely to be exposed at all, all worker doses may be bounded by assignment of a proportional dose from neutrons as described in *Neutron Dose*, Section 7.3.4.3.

7.3.4.5 Medical X-ray

In December 2003 and January 2004, an X-ray segregation project was conducted. Due to decomposition, it became necessary to segregate the decomposed X-ray film from the good film. The films which could not be interpreted and posed a health hazard to workers were segregated and destroyed. DOE Administrative Record Retention Schedule 21 Item 21.d provides for the immediate destruction of the decomposed film. (Long, 2007)

In the absence of measurement data or other specific information, a claimant-favorable approach for organ doses for LAT view can be calculated by multiplying the entrance kerma for the PA view by a default value of 2.5 and using this value along with the ICRP (ICRP, 1982) tables to compute the appropriate organ dose. For evaluation purposes, X-ray doses are always considered acute with photon energies in the range of 30 to 250 keV. For actual dose calculations, a normal distribution with an uncertainty of $\pm 30\%$ at the 99% confidence interval can be assumed. However, only the positive uncertainty should be used and a multiplier of 1.3 can be used to include uncertainty at the 99% confidence interval. (ORAUT-TKBS-0016-3)

Based on the information available to NIOSH, the medical X-ray dose for the class under evaluation can be reconstructed with sufficient accuracy.

Missed Dose

Calculation of missed external dose at Mound is problematic because only annual dose results are available, in almost all cases through the year 1977. For the year 1978 and after, actual zero and non-zero results are used. If cycle data are not available for the earlier period, then missed doses are necessarily overestimated. In most cases, annual total doses are assumed to have been received in a single cycle, and the balance of the results is assumed to be zero dosimeter results; monitoring frequency assumptions are based on Table 6-11 in the Mound Occupational External Dosimetry TBD, or assumed to be the maximum routine dosimeter exchange frequency. This is known to be an overestimating practice. Other cases may require less overestimating assumptions; however, for individual cases, the method of arriving at the assumed number of zero dosimeter results is explained in the dose reconstruction report.

7.3.5 External Dose Reconstruction Feasibility Conclusion

NIOSH has established that it has access to sufficient information to: (1) estimate the maximum external radiation dose for every type of cancer for which radiation doses are reconstructed that could have been incurred under plausible circumstances by any member of the class; or (2) estimate the external radiation doses to members of the class more precisely than a maximum dose estimate.

7.4 Evaluation of Petition Basis for SEC-00090

The following subsections evaluate the assertions made on behalf of petition SEC-00090 for the Mound Site.

The petitioner provided four affidavits, one from herself and three from former EEs. Two of the affidavits describe contamination in Building 61, a non-radiologically controlled building.

The other two affidavits do not provide any supporting information regarding the petition. One affidavit is a work summary and the other is a copy of a letter sent to the petitioner from the U.S. Department of Labor in regard to her personal dose reconstruction.

The petitioner provided an affidavit contending that contaminated items were moved to areas of Building 61, a non-radiological controlled area, for disposition to other government agencies and eventually to public sale and/or auction, and that the workers in Building 61 had no follow-up monitoring when the contaminated equipment was found. In addition, concern was raised about other incidents of radiological contamination continuing throughout the plant and that as many as one incident per week occurred after serious decommissioning work began. The petitioner contends that most of the incident critiques found violations of radiological procedures or lack of radiological control.

SEC-00090: The last item in the petitioner affidavit states that many Mound records were shipped to Nevada for burial because it was decided that the monitoring and decontamination processes "*were too costly to pursue*". The contents of the "*records would provide valuable data regarding the change in Mound culture from Safety First to Cut Costs and Get Out*".

A second affidavit provided by a former employee lists several points of concern, including a change in policy regarding the use of dosimeters and whole-body count requirement, incidents of contaminated material outside of radiological controlled areas, an employee with a full body burden as a result of an accident, reports of exposure to radioactive material and documents taken from Mound by an employee and the retrieval of these documents by Babcock and Wilcox.

The petitioner also included a letter sent to the U.S. Department of Labor in response to the denial of her claim. Three discussion points, as paraphrased by NIOSH, included:

1. Monitoring of potentially-radioactive material was done in a haphazard way and eventually monitoring of personnel via dosimeter, urinalysis, etc., was even more sporadic and eventually administratively denied to all except those employees chosen by Rad Control;
2. Mound Plant Employee Health Records are not available. The records were removed from the Mound Plant in 2005 and buried at LANL without the knowledge and permission of the DOL due to radioactive contamination;
3. Mound Plant Employee Health Records were removed from their storage site and kept in Building 61 prior to shipment.

The letter, as written by the petitioner, can be found in petition SEC-00090 (OSA Ref ID: 103188).

SEC petitions 00090 and 00091 were merged. Both petitions listed concerns regarding records disposal at LANL and NTS. The History of Mound (Long, 2007) provides in-depth review of the records history and the records disposal at LANL and NTS.

In November 1989, the U.S. Environmental Protection Agency (EPA) placed the Mound Site on the National Priorities List (CERCLIS No. OH6890008984). In 1993, DOE made a decision to close the Mound Site under the DOE Weapons Complex Reconfiguration Program. The reconfiguration was an effort to realign the weapons complex into a smaller, less-expensive operation. The realignment focus was to maintain the stockpile while retaining the required resources. Records generated in support of past missions were transferred to various receiver sites, or dispositioned per the National Archives and Records Administration (NARA)-approved retention schedules. Receiver sites include the Kansas City Plant, Savannah River Site, Los Alamos National Laboratory, Sandia National Laboratory, associated DOE Operations and Field Offices, the DOE Historian's Office, and the Office of Scientific and Technical Information (OSTI).

Mound Data Buried at the Nevada Test Site (NTS)

There are 1,639 potentially-contaminated lab notebooks that were buried at NTS after they were electronically imaged using Image Alchemy Software. These lab notebooks were indexed as part of the Classified Document Consolidation Project (CDCP) to a Searchable Classified Records Database (SCRD). Emergency disposal approval was granted by NARA in August 1999. Images were transferred to CD-ROMs which then became the official record, and the contaminated notebooks were destroyed per an approved DOE method.

Mound Data Buried at the Los Alamos National Laboratory (LANL)

The issue of Mound records buried at LANL was a topic of discussion at the ABRWH meeting on February 7, 2007. Glen Podonsky of the Department of Energy participated in this discussion, as well as members of the Board. In the intervening months, NIOSH has interviewed individuals with direct knowledge of this issue, and reviewed all available pertinent documentation.

There were 458 boxes of inactive classified contaminated and potentially-contaminated records shipped from Mound's classified Long Term Storage facility and the T Building classified vault to LANL at the direction of DOE Albuquerque Weapons Quality Division and supported by DOE/MEMP. Copies of receipts for contaminated or potentially-contaminated records shipped to LANL in August 1995 were sent to DOE/MEMP. These boxes were never formally inventoried at folder or document level. They were not included in the tracking database because of the classification. This collection contains classified R&D notebooks created in the 1950s and 1960s, financial and program records including detonator assembly, acceptance, surveillance reports, and reservoir R&D and engineering reports.

Forty-three of the 458 boxes were returned to Mound to support the Pre-1989 Dose Reconstruction Project being performed by MJW Corporation because it was believed that bioassay data were

contained within them (see Section 7.1.1 for more details). The boxes contained photocopies, printouts, and excerpted or redacted formerly-classified laboratory notebooks. The record copies of the returned notebooks were scheduled, imaged, indexed with the Document Control classified collection, and included in the hard drive and CD shipments. Two sets of the hard drive and CDs were created; one set was sent to NNSA, and the second to OSTI in 2003. LANL was to image the remaining 415 boxes of contaminated, classified documents to make them available electronically. Per the Records Manager at the time, LANL never received the DOE funding to image the collection. In 2002, the DOE OFO General Counsel informed the BWXT Records Manager that LANL had requested approval to destroy the collection, but no further communication regarding the subject was located. DOE/LM recently received documentation validating the request and authorization for destruction of the collection.

7.4.1 Evaluation of Major Topics Detailed in Petition SEC-00090

The following major topics were detailed in Petition SEC-00090. Italicized statements are from the petition; the comments that follow are from NIOSH. Please note that the petitioner made statements in the petition, attached a letter that was included in the petition, dated May 15, 2007, and provided an affidavit. All three of these comments made by the petitioner covered the same issues, but were worded differently. One wording was chosen to answer the issue of concern.

7.4.1.1 Monitoring of Workers

SEC-00090: Mound developed a culture of haphazard, administrate [sic] very controlled monitoring of workers with regard to the employee input. [Another similar statement was made in a letter dated May 15, 2007, and attached to the petition. It reads:] Monitoring of potentially radioactive materials and Mound Plant Employees was done in a haphazard way, with changing criteria almost daily. Monitoring of personnel via dosimeter, urinalysis, etc. was even more sporadic and eventually administratively denied to all except those employees chosen by "Rad Control". In place Administrative Controls prohibited the collection of Radiological data for most all Mound employees.

Historical documents exhibit an on-going program of evaluation and modification of the internal and external monitoring programs. Changes were made to the program based on changing workplace conditions and resulting changes in the character of the potential exposures. Changes were also made to take advantage of new technology in order to obtain more accurate measurements. Finally, changes were required over the years to ensure compliance with contractual radiation safety requirements and, later, with federal radiation safety regulations. Data are available in archived records and, in most cases, electronic databases containing transcription of the archived records. Information sources include film badge and TLD readings, air monitoring data, and results from bioassay programs, nose swipes, fecal analyses, whole-body counts, and chest counts. There have been concerns expressed by numerous former workers about whether the bioassay requirements matched the exposure potential to workers during the D&D era. In addition, there were several Price Anderson Act violations and fines during this period. NIOSH continues to investigate whether these occurrences compromise its ability to perform dose reconstructions with sufficient accuracy.

7.4.1.2 Incident Occurrence and Reporting

SEC-00090: *Incident occurrence and critique reporting will show a pattern of one incident after another of radioactively contaminated materials in non-controlled areas for storage and shipment.*

Incidents at the Mound Site were reported in the Corrective Action Reporting System (CARS) and could potentially have been reported in the ORPS (DOE) system, as discussed in Section 5.4.5. Undetected or unmonitored intakes occur at many DOE facilities, and dose estimates can be completed using any number of methods. Estimates of the unmonitored dose can be made by using either co-worker data or by using the approximated recorded doses for a specific worker of interest occurring prior to or following a period of unmonitored dose. OCAS-PR-004 describes several different options for calculating unmonitored dose in various situations. A definitive intake date, while helpful, is not necessary for dose reconstruction. In cases where a definite intake date cannot be ascertained, claimant-favorable assumptions may be made in lieu of specific information. Claimant-favorable assumptions may include using the absorption type that results in the highest dose when the type associated with the intake is not known; use of an intake rate (acute or chronic) based on the higher dose; or assignment of an arbitrary date for an assumed acute intake based on a date that results in the maximum dose.

7.4.1.3 Employees Prohibited from Receiving Monitoring

SEC-00090: *Employees working in non-controlled areas were prohibited from receiving monitoring.*

The basic principle of dose reconstruction is to characterize the occupational radiation environment to which a worker was exposed using available worker and/or workplace monitoring information. In cases where radiation exposures in the workplace environment cannot be fully characterized based on available data, default values based on reasonable, claimant-favorable scientific assumptions are used as substitutes. EEOICPA recognized that the process of estimating radiation doses would require dealing with uncertainties and limited data, and thus, methods were established for arriving at reasonable, claimant-favorable estimates of radiation dose received by an individual who was not monitored or inadequately monitored for exposures to radiation, or for whom exposure records are missing or incomplete. To the extent that the science and data involve uncertainties, these uncertainties are typically handled to the advantage, rather than to the detriment, of the claimant. NIOSH has used the best available science to develop the methods and guidelines for dose reconstruction.

For unmonitored individuals, on-site ambient doses or claimant-favorable dose estimates derived from co-worker dose distributions are assigned as appropriate.

7.4.1.4 Mound Documentation

SEC-00090: *Mound Lab documentation was very closely guarded by management and procedure(s). They even went so far as to send Mound security to the home of [employee's name removed] to retrieve documents that he took home in an attempt to provide himself defense in the case of future health issues. Therefore any documentation is only within Dept. of Energy Records.*

In an interview with the Records Manager at the time of this incident, she was told by the employee that he had taken records from the site to his home. The Records Manager told him that he needed to bring the records back to the site where he could copy them so he could take home the copies. After

several days, he had not done this. At this time, the Records Manager reported the event to the company attorney who called Security and requested the dispatch of security personnel to the employee's home to retrieve the records. This is not an SEC issue.

7.4.1.5 Occurrence Reporting

SEC-00090: *The (DOE) (ORPS) Occurrence reporting and processing system will contain some historic data. It is of course "not" an open record. These records were removed from the Mound site to the desert due to being radioactive.*

Incidents at the Mound Site were reported in the Corrective Action Reporting System and could potentially have been reported in the ORPS (DOE) system. In addition, incident reports were filed with the employee dosimetry records. Regarding the buried records, refer to Section 7.4.1.7 for a complete discussion on the buried records.

7.4.1.6 The "Rad" Database

SEC-00090: *The "rad" data base which did exist was not a well designed software and the integrity of the data that does exist has no value.*

The Mound Site has used several databases over the course of its history to record both internal and external employee doses. Databases such as PORECON and PURECON for internal exposures, and the External Exposure Analysis System (EXAS) and External Radiation Analysis Data (ERAD), were all merged into the Mound Environmental, Safety, and Health system (MESH) database as of September 1989. Data input to MESH is accomplished either via manual entry of data using application forms or via a number of automated data upload procedures within the application. MESH contains the following information:

- Employee data (HR): 1944 - present (in various levels of detail)
- External exposure data (ES&H): 1947 - present (in various levels of detail)
- Internal exposure data (ES&H): 1946 - present (in various levels of detail)
- Medical data (ES&H) 1990s only: some audio data from 2000-2002
- Safety data (ES&H): 1979-2003
- Environmental data (ES&H): 1992-1995 only

See Section 6.0 for a full discussion on data integrity.

7.4.1.7 Mound Plant Employee Health Records Removed to LANL

SEC-00090: *Mound Plant Employee Health Records are not available. These records were removed from the Mound Plant site in 2005 and buried in the Los Alamos, N.M. desert without the knowledge and permission of the Dept. of Labor (Energy Compensation Program) due to radioactive contamination.*

NIOSH and the ORAU Team have reviewed existing documentation relative to this concern, and interviewed three former workers involved with the records transfer to LANL. These workers include two former Mound Records Managers and a researcher who reviewed the records. In addition, NIOSH reviewed the *Mound Records Transfer History* (Long, 2007), which discusses the Mound Records Transfer History. Based on its investigation, NIOSH has determined that the records did not contain data related to employees' health records that would prevent the reconstruction of doses with sufficient accuracy.

From 1992-1995, as part of the Non-Nuclear Reconfiguration Project, all types of records were identified and shipped to six different DOE facilities/ Federal Records Centers. These records included classified, unclassified, active, and inactive records. In 1994, in preparation for the transfer of records, random sample radiation contamination surveys were performed on the inactive classified record collection located in the vault of the T-building at Mound. Some of these records were found to be contaminated with several different radionuclides. As a result, the entire collection in the T Building vault was declared contaminated and the vault subsequently designated as a Radiological Control Area. LANL ultimately agreed to accept the classified, contaminated records with the intent to image them, destroy the originals, and administer access to the imaged data. DOE Weapons Quality Division agreed and directed Mound to transfer the collection to LANL. Shipment occurred in 1995. LANL had planned to inventory the records upon their arrival because many of the boxes contained records supporting DOE nuclear production and would likely have been classified as DOE Schedule 3 (Nuclear Records). Based on the available information, NIOSH has found no evidence indicating that the collection contained primary, employee-specific dosimetry records. The original employee-specific health physics records were filed by employee name within the Mound Occupational Radiological Exposure (MORE) Records Center.

In preparation for shipment, boxes from the T Building were brought to the entrance of the classified vault. The Records Manager at Mound identified the box contents from the affixed label and documented the contents on the Reconfiguration Records Transfer sheet. Each sheet represented a box and a copy of all completed Reconfiguration Records Transfer sheets were sent to LANL. Approximately 458 cubic feet of classified, contaminated records were shipped to LANL. Items in the boxes included production records for classified programs, industrial X-rays, classified material accounting, health physics log books and a substantial number of uniquely numbered research log books. The researcher's laboratory notebooks were primarily filled in during the 1950s and 1960s. They are not believed to be the kind of files that would have recorded radiation exposure information in them, but instead, dealt with the details of their particular research project's progress. (Long, 2007 p. 164, 168) The Classified Document Control function maintained a file index that cross-referenced the employee name who received the log notebook. This file index was eventually scanned and is retrievable at OSTI.

On May 13, 2003, LANL requested and received approval from NNSA/AL to destroy and dispose of (i.e., bury) the T Building collection.

Laboratory notebooks were part of the burial that may have included information on personal dosimetry or bioassay results. The information in the notebooks is not believed to be the primary dosimetry information because all health physics-related information was kept in the MORE records database. Therefore, any included information would not be considered primary data. The buried data are not crucial to complete a dose reconstruction with sufficient accuracy. Bioassay and dosimetry records are routinely in the individual's personal dosimetry file. MORE (established in the late 1980s) kept all employee-specific exposure records, radiological incident reports, and visitor exposure records.

Approximately two years after the T Building collection was shipped to LANL (~1998), Mound contracted with MJW Corporation to perform a Pre-1989 Dose Reconstruction Project. A scientist from MJW Corporation went to LANL and reviewed a selection of the T Building records. The

selected laboratory notebooks were thought to be potentially useful for the pre-1989 project. However, once the boxes were reviewed by the scientist, it was determined that bioassay data retrieved from LANL had already been at Mound in the form of microfilms or other records. The retrieved data were only used for cross-referencing existing data. As a result of the review, 43 boxes containing laboratory notebooks were returned from LANL to Mound for use in the dose reconstruction project. These boxes were incorporated into the A-basement classified scanning project (once scanned, the originals were packed into LSA drums ultimately shipped to NTS for burial).

In 1999, Mound Security began consolidating the classified repositories within the site as Mound began to work towards site closure. Eventually, all classified documents were moved to A-basement. The combined collections (now ~100,000 documents) were scanned using Image Alchemy software. Two sets of the hard drive and DVDs were created; one set was sent to NNSA/AL and the second set went to OSTI in 2003.

After the Non-Nuclear Reconfiguration ended, all remaining unclassified records were transferred to the Dayton Federal Record Center.

7.4.1.8 Mound Plant Employee Health Records Kept in Building 61

SEC00090: *Mound Plant Employee Health Records were removed from their storage site at Mound and kept in Building 61 prior to their shipment to the desert site. I was the Supervisor over the crews that were involved with the removal and shipments of these records (materials). These materials sat in Building 61 for a period of time prior to their shipment to Nevada.*

1,639 potentially-contaminated lab notebooks were buried at NTS after they were electronically imaged using Image Alchemy Software. These lab notebooks were indexed as part of the Classified Document Consolidation Project (CDCP) to a Searchable Classified Records Database (SCRD). Emergency disposal approval was granted by NARA in August 1999. Images were transferred to CD-ROMs which then became the official record, and the contaminated notebooks were destroyed per an approved DOE method.

In the affidavit provided by the petitioner, she also states: *Building 61 was a non radiological building controlled building [sic]. Dosimetry and other monitoring processes were systematically reduced and eventually eliminated for most employees stationed in this building. When contaminated equipment was discovered in this building, no follow-up monitoring was provided to employees working in the area.*

At the time of this writing, NIOSH has not yet been able to verify a contamination incident for Building 61 that would impact NIOSH's ability to bound the dose for the proposed class. Attempts were made to contact the SEC-00090 petitioner. NIOSH was able to contact another person listed in Petition SEC-00091 to discuss this incident; however, this person could not remember the details or the approximate date of this issue.

Air concentration measurements can be used to assign internal doses from radioactive material in the general environment, in accordance with the Mound Occupational Environmental Dose TBD (ORAUT-TKBS-0016-4), as discussed in Section 6.3 of this evaluation. While this is an important

issue, NIOSH believes that this issue does not have SEC implications. NIOSH does not consider this exposure scenario an example of a maximum or bounding-exposure scenario. In the case of an unmonitored worker who had the potential for radiation exposure, NIOSH could provide a bounding dose estimate (i.e., assign dose based on the air sample data or based on the maximally-exposed, monitored worker groups) for the proposed worker class definition.

7.4.2 Evaluation of Specific Petitioner Statements in SEC-00090

This subsection presents specific affidavit statements made by workers on behalf of petition SEC-00090. The italicized statements are from the petition; the comments that follow are from NIOSH.

7.4.2.1 Employee badges

SEC-00090: 1) When I joined Mound in 1981 all employees were give [sic] dosimeter badges. The badges were read on a periodic basis and all employees were also given a periodic whole body count. 2) Shortly after Babcock [sic] and Wilcox assumed control of Mound they, as a cost savings effort, removed dosimeters from all personnel who did not immediately work in radiological areas. As an attempt to provide some minimal of [sic] radiological monitoring dosimeters were hung around the plant, but no effort was made to track or monitor the movement of individuals into those various areas, so any attempt to tie those reading to individuals was impossible. 3) If an employee made a special request for a dosimeter badge, it was denied out of hand, as an unnecessary expense.

Historical documents exhibit an on-going program of evaluation and modification of the internal and external monitoring programs. Changes were made to the program based on changing workplace conditions and resulting changes in the character of the potential exposures. Changes were also made to take advantage of new technology in order to obtain more accurate measurements. Finally, changes were required over the years to ensure compliance with contractual radiation safety requirements and, later, with federal radiation safety regulations. Data are available in archived records and, in most cases, electronic databases containing transcription of the archived records. Information sources include film badge and TLD readings, air monitoring data, and results of bioassay programs, nose swipes, fecal analyses, whole-body counts, and chest counts.

7.4.2.2 Contamination Incidents

SEC-00090: I have specific recollection of several instances of radiological materials moving outside of the controlled areas. In one instance contaminated computers were moved through Building 61 and actually sold on the public market only to have Mound personnel have to go into the buyer's warehouse and recover those computers after they had left the Mound site. In addition, I have a specific recollection of handling an incident report where a worker in the dosimeter processing lab was contaminated by radiological material that accidentally got into her lab.

Although no specifics are given in this example, it is clear that contamination incidents occurred throughout the operating history of Mound. It has been demonstrated that the doses resulting from such incidents can be estimated. Doses from internally-deposited radionuclides are estimated from bioassay results, and external doses are measured using film badges or TLDs. While this is an important issue, NIOSH believes that such issues do not have SEC implications. In the case of an

unmonitored worker, who had the potential for radiation exposure, NIOSH could estimate unmonitored dose based on co-worker data. This does not prevent NIOSH from bounding the dose for the proposed class.

7.4.2.3 Plutonium through Ventilation Ducts

SEC-00090: [Employee name removed], now deceased, told me that he had a full body burden as a result of an accident where a failure to properly control radiological material allowed plutonium to move through ventilation ducts and into his office, contaminating him. He also told me of one particularly hot area where he worked where the dosimeter badges were always completely exposed. No effort was ever made to determine if [sic] the badges were just barely fully exposed or if they had been exposed to ten times the radiation necessary to fully expose the film. He went on to relate that despite his complaints, management never made any effort to adjust the dosimeter reading schedule or to determine by other means the actual exposure.

There were certainly incidents throughout the operational history of Mound. However, the occurrence of such incidents does not prevent NIOSH from conducting dose reconstructions of sufficient accuracy. Film badge dosimeters in use at the Mound site contained both a sensitive and an insensitive element. Occupational-range measurements were made on the sensitive element, and the insensitive element had a much higher-response range. It is unlikely that any occupational exposure at Mound would fully expose the insensitive element. On the other hand, neutron film emulsions, which measure neutron doses by accumulating damage tracks, can also be darkened by gamma radiation to the extent that the damage tracks are difficult to read. When this occurs, the dose is very likely to be estimated by the health physics program personnel; for any such occurrence in the record, the neutron dose may be estimated by a proportional neutron dose based on the recorded photon dose.

7.4.2.4 Reports

SEC-00090: As a quality engineer and a member of the Mound audit staff, I constantly handled reports relating to people being exposed to radioactive materials because of system and management failures. Through I do not have any specific details, all these reports were carefully submitted to the Department of Energy and, in theory, corrective actions were taken, but exposure incidents were a constant occurrence.

Although no specifics were given in this example, incidents did occur throughout the operating history of Mound. It has been demonstrated that the doses resulting from such incidents can be estimated. Doses from internally-deposited radionuclides are estimated from bioassay results, and external doses are measured using film badges or TLDS. While this is an important issue, such issues do not have SEC implications. In the case of an unmonitored worker who had the potential for radiation exposure, NIOSH could estimate unmonitored doses. This does not prevent NIOSH from bounding the dose for the proposed class.

7.4.2.5 Documents taken from Mound

SEC-00090: I am intimately familiar with the story of the documents that [employee name removed] took from Mound and that Babcock and Wilcox so desperately wanted to recover, as those documents were stored, for some period, in my basement because of [employee name removed] concerns about how Babcock and Wilcox would react to those documents, which clearly demonstrated their mis-management would be perceived and received by responsible regulatory authority.

In an interview with the Records Manager at the time of this incident, she was told by the employee that he had taken records from the site to his home. The Records Manager told him that he needed to bring the records back to the site where he could copy them and take home the copies. After several days, he had not done this. At this time, the Records Manager reported the event to the company attorney who called Security and requested the dispatch of security personnel to the employee's home to retrieve the records. This is not an SEC issue.

7.4.3 Evaluation of General Concerns

7.4.3.1 Various Contamination Incidents

SEC-00091 presented a list of general statements by a former worker. She listed many concerns which included: use of special clothing while mixing MOCA and not always wearing a radiation badge, repeated showering, work with Be, travel from building to building for different jobs, death of a young man from radiation in the T Building in the medical facility, persistent contamination in her hair, radiation in her right arm so she could not touch her husband for three weeks, chemical storage areas, and a resume of some of her job duties.

The substance MOCA is a polyurethane elastomer used in fabricating weapons components and is not a radioactive material. Personnel working with non-radioactive weapons components (sometimes called "small parts workers") were often not monitored for radiation dose due to the lack of radiation fields in these workplaces. Although no specifics are given in this example, it is clear that contamination incidents occurred throughout the operating history of Mound. It has been demonstrated that the doses resulting from such incidents can be estimated. Doses from internally-deposited radionuclides are estimated from bioassay results, and external doses are measured using film badges or TLDs. While this is an important issue, such issues do not have SEC implications. In the case of an unmonitored worker who had the potential for radiation exposure, NIOSH can estimate unmonitored dose based on co-worker data. Regarding the concern about a young man who died from radiation in the T Building, current research has not, to date, resulted in the discovery of a record of such an incident.

Approximately 400 NOCTS files were reviewed for incident reports. Approximately one-third of the files contained incident reports describing the incident, the date of the incident, and what measures were taken (e.g., nose swipe, urine samples). The bioassay results are also found in the individual employee's file. The dates of the incidents spanned the entire period under evaluation and included spills, contamination of personnel and equipment, glovebox issues, and elevated air samples.

7.4.3.2 Inadequate Monitoring and Protection

The SEC-00091 petitioner presented several non-specific concerns, including inadequately monitored and inadequately protected radiation workers, large quantities of several radionuclides that were processed without engineering controls or protection as would be expected by today's standards, non-uniformity of radiation monitoring, manufacture of Po-Be neutrons, and research and development of radionuclides, including Ra-226, Ac-227, Th-228, Th-230, Pa-231, and U-233. The claimant clearly states that these comments can be referred to as radiation exposures and radiation doses were not monitored, either through personal monitoring or through area monitoring.

NIOSH is aware that the engineering controls of the past can be quite different from the standards of today. In addition, NIOSH is aware of the processes that occurred at Mound during its operational history and can estimate doses based on internally-deposited radionuclides from bioassay results. The other radionuclides, as mentioned above, have been discussed in Section 6.1.

7.4.3.3 Actinium-227 Urine Samples

During interviews with former Mound workers, a concern was raised regarding Ac-227 urine bioassay samples collected from employees involved in a 1991 R-Building Corridor 5 D&D job. These samples were not analyzed for a number of years, and there were apparently quality control issues with them once they were analyzed. This situation resulted in Price-Anderson Act violations (PAAA, 2006). NIOSH is continuing to investigate this issue for impact on our ability to conduct dose reconstructions with sufficient accuracy for this situation.

7.4.3.4 Neutrons

The workers associated with polonium research and neutron source production during the very early years of Monsanto (1943-1949) were not monitored for neutrons. SEC-00049 qualified as a Special Exposure Cohort based on insufficient data available to support internal dose construction.

The potential for exposure to neutrons existed for workers during the early years of Mound, and personal monitoring for neutrons started in September 1949 (Meyer, 1994; ORAUT-TKBS-0016-6). NIOSH can now estimate the potential neutron exposures with sufficient accuracy. The *Documentation of Variables in the Assessment of Neutron Doses at Mound Laboratory* (Variables, 1977), discusses track fading and NTA film sensitivity to low-energy neutrons. According to that document:

Prior to the production of Radioisotopic Thermoelectric Generators (RTG) at Mound Laboratory, polonium-beryllium (PoBe) neutron sources were used for film calibration. The energy spectrum from these neutron sources, having an average energy of about 4.5 MeV, corresponded to the spectrum of neutrons in the radiation areas. (Variables, 1977, pdf page 3).

In addition, the document goes on to say:

Since track fading is of significance in deriving dose determinations for personnel working in our areas with low energy neutron spectrums, calibration procedures utilizing the PuF4 sources were devised to incorporate corrections for track fading. Dosimeter badges of personnel have always been exchanged on varying frequencies based on the employee's degree of involvement and potential exposure. Exchanges have been made for periods of one or more days, one week, two weeks, and four weeks. Predominantly, most badges are routinely exchanged on either a two week or four week basis. The calibration procedure involves the exposure of film in badges to determine film response to known exposure for any increment of time up to four weeks. Each calibration exercise involves exposing different sets of badges to the same total dose, but at different rates over a four week period. All badges are processed at the same time on the Monday following the four week period. We typically expose 5 sets of badges to total dose of 1.0 rem. The badges, assuming we expose all to 1.0 rem, are exposed as follows:

Set 1 - Exposed to 250 rem per week for 4 consecutive weeks

Set 2 - Exposed to 333 rem per week for 3 consecutive weeks prior to process date

Set 3 - Exposed to 500 rem per week for 2 consecutive weeks prior to process date

Set 4 - Exposed to 1.0 rem during the week prior to the process date.

Set 5 - Exposed to 1.0 rem on the process date.

The response for each batch in tracks is plotted versus time and appropriate factors derived for dose evaluation for any segment of time up to four weeks. In routine operations, the assumption is made that exposures have been uniformly received by the employee during the time period the badge was worn. Health Physics survey groups closely review scheduled operations for non-routine special operational activities. Personnel performing special operations are monitored with badges for the exact period of the activity and appropriate factors are used for evaluating dose received. (Variables, 1977, pdf pages 5-6)

NIOSH concludes that NTA film sensitivity to low-energy neutrons and track fading are not SEC issues at Mound.

7.4.3.5 D&D Era Bioassay

There have been concerns expressed by numerous former workers about whether the bioassay requirements matched the exposure potential to workers during the D&D era. In addition, there were several Price Anderson Act violations and fines during this period. NIOSH continues to investigate whether these occurrences compromise its ability to perform dose reconstructions with sufficient accuracy.

7.5 Summary of Feasibility Findings for Petition SEC-00090

This report evaluates the feasibility for completing dose reconstructions for employees at the Mound Plant from February 1, 1949 through August 17, 2007. NIOSH found that the available monitoring records, process descriptions and source term data available are sufficient to complete dose reconstructions for the proposed class of employees, with the exceptions listed below.

Table 7-3 summarizes the results of the feasibility findings at the Mound Plant for each exposure source during the time period February 1, 1949 through August 17, 2007.

Table 7-3: Summary of Feasibility Findings for SEC-00090		
February 1, 1949 through August 17, 2007		
Source of Exposure	Reconstruction Feasible	Reconstruction Not Feasible
Internal¹		
Actinium-227	X (Mar 1, 1959 – Aug 17, 2007)	X (Oct 1, 1949 – Feb 28, 1959) ²
Americium-241	x	
Curium-244	x	
Plutonium-238	x	
Plutonium-239	x	
Plutonium-240	x	
Polonium-210	x	
Protactinium- 241	x	
Radium-223	x	
Radium-224	x	
Radium-226	X (Mar 1, 1959 – Aug 17, 2007)	X (Oct 1, 1949 – Feb 28, 1959) ²
Radon-220	x	
Radon-222	x	
Thorium-228	X (Mar 1, 1959 – Aug 17, 2007)	X (Oct 1, 1949 – Feb 28, 1959) ²
Thorium-230	x	
Thorium-232	x	
Uranium-233	x	
Uranium-234	x	
Uranium-235	x	
Uranium-238	x	
External		
- Gamma	x	
- Beta	x	
- Neutron	x	
- Occupational Medical x-ray	x	

¹ "Internal" includes an evaluation of urinalysis (in vitro), airborne dust, and lung (in vivo) data

² K-65 sludge (the source of Ac-227, Ra-226, and Th-228 concerns) did not arrive on site until October 1949; therefore, these radionuclides are not relevant from the beginning of the evaluation period (February 1, 1949) until October, 1949. The related area of work was decontaminated and decommissioned on February 28, 1959; sufficient monitoring was in place from that time forward.

As of December 6, 2007, a total of 491 claims have been submitted to NIOSH for individuals who worked at Mound and are covered by the proposed class definition evaluated in this report. Dose reconstructions have been completed for 348 of those individuals (71%).

8.0 Evaluation of Health Endangerment for Petition SEC-00090

The health endangerment determination for the class of employees covered by this evaluation report is governed by both EEOICPA and 42 C.F.R. § 83.13(c)(3). Under these requirements, if it is not feasible to estimate with sufficient accuracy radiation doses for members of the class, NIOSH must also determine that there is a reasonable likelihood that such radiation doses may have endangered the health of members of the class. Section 83.13 requires NIOSH to assume that any duration of unprotected exposure may have endangered the health of members of a class when it has been established that the class may have been exposed to radiation during a discrete incident likely to have involved levels of exposure similarly high to those occurring during nuclear criticality incidents. If the occurrence of such an exceptionally high-level exposure has not been established, then NIOSH is required to specify that health was endangered for those workers who were employed for a number of work days aggregating at least 250 work days within the parameters established for the class or in combination with work days within the parameters established for one or more other classes of employees in the SEC.

NIOSH has insufficient information regarding internal Ra-Ac-Th exposures at Mound from the arrival of K-65 sludge in October 1949 through February 28, 1959, when the related area of work was decontaminated and decommissioned and sufficient monitoring was in place. NIOSH's evaluation determined that it is not feasible to estimate radiation dose for members of the proposed class with sufficient accuracy based on the sum of information available from available resources. Modification of the class definition regarding health endangerment and minimum required employment periods, therefore, is required.

9.0 NIOSH-Proposed Class for Petition SEC-00090

Based on its research, NIOSH reduced the petitioner-requested class to define a single class of employees for which NIOSH cannot estimate radiation doses with sufficient accuracy. The NIOSH-proposed class includes all employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors and subcontractors, who were monitored or should have been monitored, for internal Ra-Ac-Th exposures while working in all areas of the Mound site for a number of work days aggregating at least 250 work days from October 1, 1949 through February 28, 1959, or in combination with work days within the parameters established for one or more other classes of employees in the SEC.

NIOSH has carefully reviewed all material sent in by the petitioner, including the specific assertions stated in the petition, and has responded herein (see Section 7.4). NIOSH has also reviewed available technical resources and many other references, including the Site Research Database (SRDB) and several Mound databases, for information relevant to SEC-00090. In addition, NIOSH reviewed its NOCTS dose reconstruction database to identify EEOICPA-related dose reconstructions that might provide information relevant to the petition evaluation.

These actions are based on existing, approved NIOSH processes used in dose reconstruction for claims under EEOICPA. NIOSH's guiding principle in conducting these dose reconstructions is to ensure that the assumptions used are fair, consistent, and well-grounded in the best available science. Simultaneously, uncertainties in the science and data must be handled to the advantage, rather than to the detriment, of the petitioners. When adequate personal dose monitoring information is not available, or is very limited, NIOSH may use the highest reasonably possible radiation dose, based on reliable science, documented experience, and relevant data to determine the feasibility of reconstructing the dose of an SEC petition class. NIOSH has complied with these standards of performance in determining that it would be feasible to reconstruct the dose for the class proposed in this petition.

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Tab E

Board Recommendation Letter to Secretary Leavitt



ADVISORY BOARD ON RADIATION AND WORKER HEALTH
4676 Columbia Parkway, MS: C-46
Cincinnati, Ohio 45226
(513) 533-6825

January 30, 2008

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Atlanta, Georgia

The Honorable Michael O. Leavitt
Secretary of Health and Human Services
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Dear Mr. Secretary:

The Advisory Board on Radiation and Worker Health (The Board) has evaluated SEC Petition-00092 concerning workers at the Lawrence Livermore National Laboratory (LLNL) in Livermore and Tracey, California under the statutory requirements established by EEOICPA and incorporated into 42 CFR Sec. 83.13 and 83.14. The Board respectfully recommends Special Exposure Cohort (SEC) status be accorded to all employees of the Department of Energy (DOE), its predecessor agencies, and DOE contractors or subcontractors who were monitored for radiation exposure while working at the Lawrence Livermore National Laboratory for a number of work days aggregating at least 250 work days from January 1, 1950 through December 31, 1973, or in combination with work days within the parameters established for one or more other classes of employees in the SEC. The Board notes that although NIOSH found that they were unable to completely reconstruct radiation doses for these employees, NIOSH believes that they are able to reconstruct other components of the internal dose (except for mixed fission and activation products) and all external doses.

This recommendation is based on the following factors:

- People working at the LLNL facility during this time period worked on research and production activities related to nuclear weapons production.
- The NIOSH review of the available monitoring data as well as the available source term and other information found that they lacked adequate information necessary to conduct accurate individual dose reconstructions for internal doses from exposures to mixed fission and activation products during the time period in question.

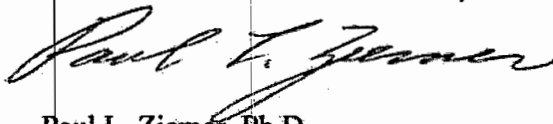
The Honorable Michael O. Leavitt

January 30, 2008

- NIOSH determined that health may have been endangered for these LLNL facility workers. The Board concurs with this determination.

Enclosed is supporting documentation from the recent Advisory Board Meeting held in Las Vegas, Nevada where this class of the special exposure cohort was discussed. If any of these items are unavailable at this time, they will follow shortly.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul L. Ziemer".

Paul L. Ziemer, Ph.D.
Chairman

Enc.

Tab F

Transcript of relevant Board discussion at Board Meeting