

Centers for Disease Control and Prevention  
National Institute for Occupational Safety and Health  
Advisory Board on Radiation and Worker Health (ABRWH)  
Subcommittee for Procedure Reviews  
Meeting Minutes

March 14, 2024

## **Summary Proceedings**

The Subcommittee for Procedure Reviews meeting convened via teleconference at 11:00 a.m. Eastern Daylight Time (EDT), Ms. Josie Beach, Chair, presiding.

## **Attendees**

### **Members**

Josie Beach, Chair  
Loretta Valerio, Member  
Paul Ziemer, Member

### **Non-Members**

Rashaun Roberts, Designated Federal Official  
Barton, Bob, SC&A  
Behling, Kathy, SC&A  
Buchanan, Ron, SC&A  
Cardarelli, John, DCAS  
DeGarmo, Denise, Worker Representative  
Farver, Doug, SC&A  
Gogliotti, Rose, SC&A  
Griffiths, Richard, SC&A  
Holsberger, Maria, HHS  
Kranbuhl, Alek, DCAS  
Lobaugh, Megan, DCAS  
Mangel, Amy, SC&A  
Marion-Moss, Lori, DCAS  
Ostrow, Steve, SC&A  
Rafke, Michael, HHS  
Rutherford, LaVon, DCAS

Siebert, Scott, ORAU  
Taulbee, Tim, DCAS  
Todd, Michael, DCAS  
Ulsh, Brant, DCAS

## **Roll Call/Welcome - Dr. Rashaun Roberts, DFO**

Dr. Rashaun Roberts called to order the Subcommittee for Procedures Review at 11:00 a.m. EDT on March 14, 2024, via teleconference. A roll call of all Subcommittee members confirmed that a quorum was present. The quorum was maintained throughout the meeting. Subcommittee members, federal staff, and contractors announced conflicts of interest during roll call. Dr. Roberts turned the meeting over to Ms. Beach, Subcommittee chair. Two changes to the agenda were announced. There will be no discussion of Peak Street because that was placed on the agenda by mistake. And the discussion of ORAUT-RPRT-0084 will be moved to later in the day when SC&A's lead person is available.

## **Carry Over Items from November 6, 2023, SPR Meeting**

### **DCAS PER-049 "Mallinckrodt TBD Revisions."**

Kathy Behling, SC&A, pointed out that there were two open questions relating to this PER. One was an observation from SCA's review about a gap in beta monitoring at the St. Louis Airport Storage Site (SLAPS), and the second was a question from a Subcommittee member about the starting date for the covered period at SLAPS. There are indications that radioactive material arrived at SLAPS in 1946, but the beginning of the covered period is 1947. LaVon Rutherford, DCAS, replied that DCAS was still working on a response to the observation, and he reported more information relevant to the beginning of SLAPS covered period. DOL has opined that according to their information the federal government took control of SLAPS in January 1947, but asked DOE if they had evidence of an earlier date. DOE is investigating that now.

### **DCAS-PER-093, "Texas City Chemical" NIOSH Response**

Alek Kranbuhl, DCAS, described the actions DCAS had taken in response to four findings and one observation from SC&A's review of this PER. DCAS agreed with all the findings, but when it evaluated the effects of the underlying errors, it determined that they did not affect the outcome of any claims. The observation related to the fact that using a particular NIOSH dosimetry application was complicated for Texas City, and DCAS acknowledged that. Following a brief discussion, SC&A recommending closing the findings and observations, and the Subcommittee agreed.

### **ANL-West TBD Revision – review application of ORAUT-RPRT-0097**

At its last meeting the Subcommittee decided that closeout language for the findings from SC&A's review of this document would be prepared once the meeting transcript was ready. The Transcript is now ready, and SC&A will draft closeout language for DCAS to review. With respect to the application of ORAUT-RPRT-0097, the ANL-West Work Group has tasked SC&A to perform a detailed review of that document as part of its consideration of an SEC Petition. Consequently, the Subcommittee will wait until that review is complete, before deciding if it should investigate further.

## **Newly Issued SC&A Reviews**

### **ORAUT-RPRT-0071, “External Dose Coworker Methodology”**

Dr. Richard Griffiths, SC&A, described the results of SC&A’s review of this document, which describes a multiple imputation method for dealing with censored (“less than”) data. SC&A agrees that multiple imputation is a significant improvement over the previous method, which was to substitute half the Limit of Detection value for each censored data point. But their review did result in several observations, which would likely improve RPRT-0071. DCAS did not dispute the observations, but questioned the wisdom of spending effort to respond when there are other important tasks for their statisticians to work on. During the Subcommittee’s discussion, it was noted that imputed values represent the lowest values in a dataset, and dose reconstructions utilize the higher values. Consequently, the Subcommittee decided that they would not expect a response from DCAS to these observations at this time. The observations are considered “in progress,” but no action is expected for now.

### **DCAS-PER-047, Subtask 4, “GJOO”**

Dr. Ron Buchanan presented the results of Subtask 4 of SC&A’s review of this PER. Subtask 4 consisted of reviewing two dose reconstructions that DCAS had re-evaluated as part of the PER. Their review resulted in four findings, all related to the second of the dose reconstructions. These findings related to incorrectly accounting for missing data in parts of years, and not including doses in some years. However, the re-evaluated dose reconstructions both used significant overestimating approaches, so these mistakes would not affect the outcome of the dose reconstruction. Scott Davis, ORAUT, reported that, upon receiving SC&A’s report, he had reviewed the other dose reconstructions from PER-047 that had been performed by the same dose reconstruction, and he found that similar errors were not made in those. Since the errors would not result in a different compensation decision for the reviewed case, and since the errors were not systematic, the Subcommittee voted to close all four findings.

### **“Amchitka Island Template”**

Doug Farver, SC&A, presented the results of SC&A’s review of the Amchitka Island dose reconstruction template. For sites with a small number of claims, DCAS has prepared dose reconstruction (DR) methodology documents and DR templates, rather than site profiles, to provide guidance on how to perform dose reconstructions. SC&A’s review of the DR methodology and DR template for Amchitka Island resulted in four findings and five observations. Three of the findings and two of the observations pertained to differences between the DR methodology and DR template. The DR template was prepared a few years after the DR methodology, so more information was available for the template than for the methodology. The methodology document was not revised to be consistent with the template. During the discussion, DCAS maintained that DR methodologies and DR templates are less prescriptive than guidance providing in other cases, and that the individual dose reconstruction reports should be viewed as the final product that is worth careful scrutiny. DCAS is of the opinion that review of a

set of dose reconstruction reports for sites that utilize DR methodologies and DR templates is the proper way to determine if appropriate guidance is being provided. The Subcommittee and SC&A agreed that reviewing additional dose reconstruction reports would be appropriate, and decided to consider whether the findings from this review should be re-classified as observations.

### **“Albuquerque Operations Office Template”**

Subcommittee member Valerio left the call for this this discussion.

Kathy Behling, SC&A, presented the results of SC&A’s review of the Albuquerque Operations Office (AOO) dose reconstruction methodology and template. SC&A’s review resulted in two findings and four observations. One finding was that the dose reconstruction template did not include instructions for the earliest years of AOO operation; the other is that the template references an intake table from a superseded version the Los Alamos National Lab site profile, and a similar table is not in the current version. The observations related to lack of specificity or inconsistency between the AOO methodology and template. SC&A also reviewed one dose reconstruction that was performed using the AOO instructions and found that the dose reconstruction appeared to comply with the guidance provided. The Subcommittee agreed not to select any additional sites that utilized methodologies and templates until they had a discussion with SC&A about how best to perform these reviews.

### **ORAUT Report-0084, “Two-Count Filter Method for Measurement of Thoron Progeny in Air”**

Subcommittee member Valerio returned to the call.

Dr. Sayed Naeem, SC&A, presented the results of SC&A’s review of ORAUT-RPRT-0084. SC&A concluded that the two-count method was appropriate for estimating airborne concentrations of thoron progeny of dosimetric interest and did not have any findings. The Subcommittee accepted the report.

### **PERs previously identified as not needing review**

During a discussion of Subcommittee accomplishments at the November 16, 2023, Subcommittee meeting, members became aware that there were 14 PERs that the previous Subcommittee chair had considered unnecessary to review. Members decided to revisit that decision in light of current Subcommittee activities.

Kathy Behling, SC&A, led the discussion. The PERs under consideration are:

- OCAS-PER-024, Rev. 0, “General Steel Industries TBD Approval”
- OCAS-PER-026, Rev. 0, “Pantex TBD Revision”
- OCAS-PER-027, Rev. 0, “Clarksville and Medina Site Profile”
- OCAS-PER-028, Rev. 0, “Pinellas TBD Revision”
- OCAS-PER-030, Rev. 0, “Nevada Test Site TBD Revision”
- DCAS-PER-034, Rev. 0, “Harshaw Chemical Company TBD Revision”

- DCAS-PER-036, Rev. 0, “Blockson TBD Revision”
- DCAS-PER-039, Rev. 0, “Baker Perkins TBD Revision”
- DCAS-PER-041, Rev. 0, “OTIB-6 Revision”
- DCAS-PER-044, Rev. 0, “Metallurgical Laboratory”
- DCAS-PER-048, Rev. 0, “Wah Chang”
- DCAS-PER-056, Rev. 0, “BWXT Virginia”
- DCAS-PER-058, Rev. 0, “Dow Chemical Company (Madison Site)”
- DCAS-PER-074, Rev. 0, “NIOSH-IREP 5.8 Upgrade”

The Subcommittee discussed the nature of each of these PERs and related reviews that have been performed, and decided that four of these, PER-034, PER-036, PER-039, and PER-079 did, in fact, warrant Subcommittee review.

### **Preparation for April 2024 Full ABRWH Meeting: Review of technical guidance documents ready for full Board approval**

Kathy Behling, SC&A, presented the list of documents that the Subcommittee has completed reviewing, but which it has not yet presented to the full Board. She recommended that five of those be presented at the April Board meeting. Those are: PER-042, PER-055, OTIB-011, OTIB-019, and OTIB-054. The Subcommittee agreed with her recommendation.

Ms. Behling also commented that she had reviewed historical Subcommittee activities and realized that there were quite a few documents that the Subcommittee had completed reviewing that she had left off earlier lists. Consequently, there are more documents on the list at this meeting than there had been at previous Subcommittee meetings.

### **Newly Issued Guidance Documents and Supplemental Topics**

The Subcommittee returned to its earlier discussion of sites where DR methodologies and templates are used. The Subcommittee decided that reviewing more dose reconstructions that were done for each of these sites would provide higher quality reviews of the methodologies and templates. Therefore, they instructed SC&A to work with DCAS to select 5 to 10 dose reconstructions from Amchitka for review. The Subcommittee did not task SC&A to review any newly issued guidance documents.

### **Meeting Adjourned**

The Subcommittee selected July 18, 2024, as the preferred date for the next meeting with July 30, 2024, selected as a backup. The meeting was adjourned at 4:35 pm Eastern Daylight Time.