



## ADVISORY BOARD ON RADIATION AND WORKER HEALTH

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July 26, 2005

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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 -0006-2 concerning industrial radiographers who worked at the Iowa Army Ammunition Plant (IAAP) under the statutory requirements established by EEOICPA and incorporated into 42 CFR Sec. 83.13 (c) (1) and 42 CFR Sec. 83.13 (c) (3). The Board respectfully recommends a Special Exposure Cohort be accorded to all Department of Energy (DOE) employees or its contractor or subcontractor employees who worked as radiographers from May 1948 to March 1949 in support of Line 1 operations at the Iowa Army Ammunition Plant (IAAP) and whom were employed for a number of work days aggregating at least 250 work days, occurring under this employment in combination with work days of employment occurring within the parameters (excluding aggregate work day requirements) established for other classes of employees included in the SEC. This recommendation is based on two factors:

- During the time period in question, there was no individual radiation monitoring program at IAAP. An individual dosimetry program was not established at that site until 1955. However, there is not sufficient information available on the radiographic operations during the time period in question to be able to utilize monitoring data from a subsequent time to reconstruct individual exposures during the earlier time period. In order to do so in a scientifically sound manner, additional information on the radiological sources, shielding, and the radiography process would be needed. Based on these considerations, NIOSH has concluded in its evaluation report that it is not feasible to estimate with sufficient accuracy the external doses incurred by these radiographers at IAAP during the time period in question. The Board concurs.

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- In its evaluation report, NIOSH has concluded that it is likely that radiation doses for this group of workers at the Iowa Army Ammunition Plant during this time period could have endangered the health of members of this class. The Board concurs.

Based on these considerations, and on the discussions and deliberations at our July 5-7, 2005 Board meeting, the Board recommends that this Special Exposure Cohort petition be granted.

Enclosed is supporting documentation from the Advisory Board Meeting held July 5 -7, 2005 in St. Louis, Missouri. This documentation includes transcripts of public comments on the petition, copies of the petition and the NIOSH review thereof, and related documents distributed by NIOSH and the petitioners. If any of these items are unavailable at this time, they will follow shortly.

Sincerely,



Paul L. Ziemer, Chairman  
Advisory Board on Radiation and Worker Health

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