



ADVISORY BOARD ON RADIATION AND WORKER HEALTH

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May 24, 2006

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 -00020 concerning workers at the Pacific Proving Grounds 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 at the Pacific Proving Ground (PPG) from 1946 through 1962 who were monitored or should have been monitored for exposure to ionizing radiation as a result of nuclear weapons testing at the PPG and who were employed for a number of work days aggregating at least 250 work days, occurring under this employment or 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 the following factors:

- These workers were employed during the testing of atomic weapons.
- There are significant limitations to the available monitoring data collected at the Pacific Proving Grounds, particularly data needed for the accurate reconstruction of internal doses associated with the inhalation of radionuclides at the site. NIOSH concluded that the available information is not sufficient to document or estimate the potential maximum internal exposures to workers at the Pacific Proving Grounds under plausible circumstances during the period of AEC operations from 1946 to 1962. The Board concurs with this conclusion.
- The Board has reviewed information which confirms that radiation exposures at the Pacific Proving Grounds during the time period in question could have endangered the health of members of this class.

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The Board notes that many of the people who were employed at the Pacific Proving Ground during the time period in question lived on site during their work periods. This should be considered during the evaluation of their work duration.

The Board is still evaluating issues related to people who may have been exposed to radiation during discrete incidents that could have involved exceptionally high exposures to radiation while working at the Pacific Proving Ground (e.g., those who were present during the actual atomic bomb testing) and who may not meet the 250 work day requirement described above. The Board will continue to review this matter and may make future additional recommendations regarding this group.

Enclosed is supporting documentation from the recent Advisory Board Meetings held in Oak Ridge, Tennessee and Denver, Colorado where this special exposure cohort petition was discussed. 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, Ph.D.
Chairman

Encl.