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# United Steelworkers of America

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May 6, 2003

NIOSH DOCKET OFFICE  
Robert A. Taft Laboratories  
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4676 Columbia Parkway  
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To: Docket Officer

These comments are submitted on behalf of the United Steelworkers of America, Local 8031, its retirees, surviving spouses, and the over 20,000 employees who have worked at the Rocky Flats site since the plant's inception as a response to the Proposed Procedure for designating classes of employees as members of the Special Cohort under the Energy Employees Occupational Illness Compensation Program Act of 2000, published in the Federal Register on March 7, 2003.

Both NIOSH in its January 2001 Summary of Findings and DOE in its disclosure of supplying inadequate Personal Protective Equipment (PPE) (see attachments), admit they are unable to provide documentation for dose reconstruction.

Because of the daily hazards, numerous personnel movement, poor radiation safety practices, substandard personal protective equipment, multiple sources of radiation, and NIOSH's own admission in the NIOSH Summary of Findings – January 2001:

- Accurate and complete exposure, work history, accidents, releases, spills, and medical records data are not available for this population.
- Individual workers cannot consistently be linked to their exposure and medical data.
- At the present time the necessary information to conduct epidemiologic exposure assessment or hazard surveillance studies of remediation workers is not available.

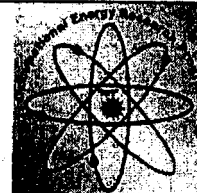
Respectfully submitted,

Judy Yeater, Co-Chair  
Hazardous & Toxic Materials Committee

JY:lb:Enclosures  
opeiu #5/afl-cio



# NIOSH Summary of Findings



Rocky Flats Edition

January 2001

## Glossary of Terms

**Remediation Workers:** Workers who are involved in any of the following activities at DOE sites: decontamination, decommissioning, dismantlement, deactivation, waste management, and environmental restoration.

**Decontamination:** The removal of hazardous material (typically radioactive or chemical material) from facilities, soils, or equipment by washing, chemical action, mechanical cleaning, or other techniques.

**Decommissioning:** The process of removing a facility from operation, followed by decontamination, entombment, dismantlement, or conversion to another use.

**Dismantlement:** The disassembly or demolition and removal of any structure, system, or component after decommissioning and the satisfactory interim or long-term disposal of the residue from all, or portions of, the facility.



## NIOSH Assessment of Information Needed for the Evaluation of the Health Effects Due to Occupational Exposures for DOE Site Remediation Workers.

**Investigators:** Sharon R. Silver, M.A., Cynthia F. Robinson, Ph.D., Greg Kinnes, M.S., Tim Taulbee, M.S., Steve Ahrenholz, Ph.D.

**Sites Included in the Assessment:** Fernald, Mound, Rocky Flats, Savannah River Site, Hanford, Oak Ridge, and Idaho National Engineering and Environmental Laboratory.

**Purpose:** This report summarizes the findings of two NIOSH projects which assessed whether records currently collected by DOE sites allow accurate identification of remediation workers and their exposure, work history, and medical information. This information is needed in order to evaluate any relationships between occupational exposures and health effects workers may experience.

**Information Needed to Evaluate Health Effects:** To conduct studies that can adequately evaluate the health effects of occupational exposures of current and future remediation workers, the following information is required:

1. Comprehensive worker rosters (lists) identifying all remediation workers;
2. Adequate exposure, work history, and medical information for all remediation workers; and
3. Links which match individual workers with their exposure, work history and medical information.

**How This NIOSH Assessment Was Done:** The assessment included two recent National Institute for Occupational Safety and Health (NIOSH) projects, the Exposure Assessment Feasibility Study (EAFS) and the Integrated Health, Work History, and Exposure Database for DOE Site Remediation Workers. These two projects assessed the availability of information about remediation workers and their activities to address the following questions:

1. Can remediation workers be identified?
2. Are adequate exposure, work history, and medical data available for remediation workers?
3. Can individual workers be linked to their exposure and medical data?
4. With current knowledge and understanding, as described in this report, can epidemiologic, exposure assessment, or hazard surveillance studies of remediation workers and the technologies they employ be conducted now or in the foreseeable future?



## Glossary of Terms Cont.

**Deactivation:** The process of placing a formerly active processing facility in a safe and stable condition until it can be decommissioned or dismantled.

### Further NIOSH Information:

- For a copy of the final summary report, executive summary, or individual site-specific reports, call:

1-800-356-4674

- For a summary of NIOSH research involving Department of Energy workers, visit online at:

[www.cdc.gov/niosh/oeindex.html](http://www.cdc.gov/niosh/oeindex.html)

## Report Findings

### 1. Some remediation workers who have worked at DOE sites cannot be identified.

Complete rosters of current and former remediation workers do not exist. Reconstruction of rosters from multiple data sources at the sites is labor intensive and may exclude some groups of workers.

### 2. Accurate and complete exposure, work history, and medical records data are not available for this population.

Although radiation exposure records appear to be complete, decentralized responsibility for chemical exposure assessment and other records has led to gaps in exposure, work history, and medical data.

### 3. Individual workers cannot consistently be linked to their exposure and medical data.

The storage of data and records in hard copy format, on incompatible software platforms, and on media produced by now obsolete hardware has diminished the ability to identify workers and link them with their work history, exposure, and medical data. The failure to standardize data collection and archiving both within and among DOE sites will hinder linkage of individuals to their data.

### 4. At the present time the necessary information to conduct epidemiologic, exposure assessment, or hazard surveillance studies of remediation workers is not available.

The absence of worker rosters, the difficulty of creating such rosters with currently available data, gaps in work history, exposure, and medical data, and data linkage problems limit the ability to conduct accurate and comprehensive studies of remediation workers.

This report contains recommendations that address each of these findings.

## Important Announcements

For more information, please contact DOE site representative, Karen Lutz at (303) 966-4546. Copies of the complete report, [Evaluation of Data for DOE Site Remediation Workers](#) and individual site-specific reports can be found in the DOE Reading Room at Front Range Community College, 3705 112th Avenue, Westminster, Colorado, 80030, (303) 469-4435. Questions concerning this study should be directed to the investigators at (513) 841-4400.

## NIOSH/HERB Contact Point for further information...

National Institute for Occupational Safety and Health (NIOSH)  
Division of Surveillance, Hazard Evaluations and Field Studies (DSHEFS)  
Health-Related Energy Research Branch (HERB)

NIOSH-HERB MS R-44  
4676 Columbia Parkway  
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### 535 Half-Face Respirators

The current revision of 10 CFR Part 20, which is to take effect January 1, 1994, states that half-face respirators are "...not satisfactory for use where it might be possible (e.g., if an accident or emergency were to occur) for the ambient airborne concentrations to reach instantaneous values greater than 10 times the...[DAC values]." "This type of respirator is not suitable for protection against plutonium or other high-toxicity materials."

1. Half-face respirators shall not be used on a routine basis as a precautionary measure for protecting workers from potential airborne radioactive materials. Half-face respirators are undesirable because their seal with the face is more likely to fail than with full-face respirators, particularly during heavy work. As a result, their permitted protection factor is low.
2. The use of half-face respirators is not prohibited in situations where intakes of radioactive material will be low, such as a few mrem, and where industrial and safety considerations warrant, such as during the operation of heavy equipment.
3. A few DOE facilities use half-face respirators for emergency evacuation purposes. This practice is discouraged and shall not be implemented where not in place.