

January 18, 2002

Mr. Larry Elliott
Executive Secretary, ABRWH, NIOSH, CDC
4676 Columbia Parkway
Cincinnati, Ohio, 45226

01-23-02 P01:48 IN

Dear Sir,

I have just read the article in Occupational Safety & Health Vol.32, No. 1, regarding the initial meeting of the ABRWH on Jan. 22-23, 02. I know there has been some controversy regarding membership of the Committee, and I am inclined to think and agree that the employees are under-represented, but if everyone on the Committee has integrity and is not serving some other agenda, then it probably doesn't make much difference.

I have a vested interest in the work of the Committee, in that I have long worked in the nuclear and safety industries and am a breast cancer survivor, having had two mastectomies. My exposure to radiation through the years has not been high, but exposure does exist. Which leads me to several points I think should be considered when determining exposure v. compensation.

1. There was a news story on television this morning announcing that Radon gas in homes causes half of the lung cancers which occur to the citizenry of the US. They went on to explain how any low doses of radiation could cause illness and also that there is an accumulative effect on the body due to exposure. I have long subscribed to this philosophy, (it is the basis for the ALARA "As Low As Reasonably Achievable" program) never expecting that I might become a victim.
2. When OSHA wrote it's regulations regarding Asbestos exposure re. preventing Asbestos related diseases, they established a very low exposure limit which was applied universally to workers in the industry as well as to the individual who had only incidental contact with Asbestos. The rational behind this was that any single fibre of Asbestos could be the one that caused a cancer or other related disease; therefore, eliminating or at least severely limiting exposure was the safest route to follow.
3. The DOE Radiological Control Standard contains a statement - "Biological effects from chronic doses of radiation may occur in the exposed individual or in the future children of the exposed individual. There is a slight risk that cancer may be caused by chronic radiation doses." What this says to me, is that the potential hazard of disease due to exposure is recognized and that there is no way to prove or disprove with any certainty what may or may not have caused a cancer to any named individual.

Formulas are wonderful tools when applied to statistical situations such as masses of people, but when they are applied to an individual they are virtually worthless since they can discriminate against the individual. Congress recognized the need for this Compensation Program because individuals such as myself have had our quality (and in many cases - quantity) of life effected. I understand that it would make the Program much easier (and much cheaper) to administer if each person, individually, could be ignored and only those that fit into a precise formula would be compensated. However, I don't think that is what Congress had in mind. I believe they intended to treat individuals right! I certainly hope that was their intent - from a moral standpoint, not just from my standpoint (which I admit may be somewhat prejudiced).

Thank you for your time reading this. I hope the information will be used and useful.

Respectfully,