U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES CENTERS FOR DISEASE CONTROL NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH

+ + + + +

ADVISORY BOARD ON RADIATION AND WORKER HEALTH

+ + + + +

MOUND WORK GROUP

+ + + + +

THURSDAY SEPTEMBER 29, 2016

+ + + + +

The Work Group convened in the Bridges Room of the Holiday Inn Cincinnati Airport, 1717 Airport Exchange Boulevard, Erlanger, Kentucky, at 9:00 a.m., Eastern Time, Josie Beach, Chair, presiding.

PRESENT:

JOSIE BEACH, Chair BRADLEY P. CLAWSON, Member PHILLIP SCHOFIELD, Member PAUL L. ZIEMER, Member*

ALSO PRESENT:

TED KATZ, Designated Federal Official NANCY ADAMS, NIOSH Contractor* BOB BARTON, SC&A* RON BUCHANAN, SC&A* PETE DARNELL, DCAS JOE FITZGERALD, SC&A JENNY LIN, HHS* JIM NETON, DCAS MATTHEW SMITH, ORAU Team* DONALD STEWART, ORAU Team JOHN STIVER, SC&A*

*Participating via telephone

Contents

Welcome and Roll Call	4
Matrix Issue #5 PU-240, 241	6
Matrix Issue #6 Tritides 1	.2
Matrix Issue #9 High-Fired PU-238 1	.5
Matrix Issues #11, 12 & 13 2	22
Adjourn	16

1	P-R-O-C-E-E-D-I-N-G-S
2	9:00 a.m.
3	Welcome and Roll Call
4	MR. KATZ: So, good morning, everyone.
5	It's start time, 9 o'clock. This is the Advisory
6	Board on Radiation and Worker Health, Mound Work

And we're all assembled here in the room.

Our meeting this morning, we have an 8 9 agenda and some materials for the meeting. 10 They're all posted on the NIOSH website. For folks who are on the phone, go to the NIOSH website for 11 12 this program and schedule of meetings, today's 13 date, and you can open up the agenda and some 14 materials associated with the agenda there to 15 follow along with the discussion.

16 So let's do roll call to start with. 17 We're speaking about a site, so please speak to 18 conflicts of interest as we go. And I'll start 19 with Board Members in the room.

20 (Roll call.)

21 MR. KATZ: So I think that takes care

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

7

Group.

1 of all preliminaries. Josie, it's your meeting. 2 Please, everyone on the phone, except 3 when you're speaking please mute your phones, *6 to mute your phone if you don't have a mute button, 4 5 and *6 to come off of mute. Thanks. 6 CHAIR BEACH: Okay, thank you. And 7 welcome, everybody, to this meeting. We haven't met since 2012, when I was going back through 8 9 The two things that we have that we can documents.

10 look at today are SC&A's review of the remaining 11 Site Profile issues at Mound, and the matrix that 12 Tim put together -- or Peter put together -- excuse 13 me, Peter.

14 What I thought we would do is go through and there are several of these that SC&A has 15 16 determined that -- or they recommend that we should 17 close them. I thought maybe we should go through all of those first, saving 9, 10, and 13, which is 18 matrix issues 11, 12, and 13. It could be a little 19 confusing because we combined the old matrix 20 21 numbers with the new one, but savings those. Those

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

fall under the V&V, the White Paper that Peter put
 together.

Anyway, if we could through and take care of those easy ones and any discussion that we need and then move on to the ones that I'm sure there's going to be some discussion on. Everybody okay with that?

8 MEMBER CLAWSON: You're the Chair.

9 Matrix Issue #5 PU-240, 241

10 CHAIR BEACH: Okay, so if we start with 11 matrix issues, it's not issue 1, but it's old matrix 12 issue 5, the Pu-240/-241. I don't know if NIOSH 13 wants to just give a brief and then SC&A goes from 14 there.

15 MR. FITZGERALD: Just for context sake 16 -- this is Joe Fitzgerald. When the Work Group 17 tasked us, the Board tasked us, in 2015, at the Board meeting in November, to go through the 18 19 newly-issued TBDs to review them and to provide any 20 feedback for discussion, we did а pretty 21 comprehensive job.

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 Mound has a long history, as we were 2 just commenting, and some of it is a little 3 convoluted because we did spend quite a bit of time on issues, such as the environmental dose issues. 4 So we wanted to certainly scrub it pretty well 5 6 because there was a lot of discussions that went on in Work Group meetings and what have you. 7 So we did a pretty thorough scrub in terms of looking 8 9 at transcripts, looking at different exchanges of 10 White Papers, and so this matrix is the product of 11 that.

12 And a lot of it, frankly -- and this is 13 by going to your comment about just reaching 14 closure -- is just clarifying with NIOSH where we came out, because, again, I think, in a lot of 15 16 cases, there was convergence, agreement, but it 17 didn't seem like there was any closure per se because we were on to other topics or kind of got 18 19 into tangential issues. So, just as context. A lot of this isn't so much we have a 20

21 problem per se. It's just that we kind of lost the

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	thread in some cases and wanted to know, where did
2	the TBD come out per se and where can we find
3	something that documents a resolution of that
4	issue? Because in discussions, it looked like we
5	were in agreement.

So, with that background, on this item,
issue 1 -- oh, sure.

This is Pete Darnell. MR. DARNELL: 8 9 Which you speaking from, paper are the SC&A 10 February document or the paper that NIOSH put out? 11 MR. FITZGERALD: Yeah, the February 12 just wanted to provide a little document. Ι context as to how that is laid out. And in a lot 13 14 of cases, it speaks to agreement, in a sense, but 15 also suggests that we didn't really nail it as far as sort of a conclusion and some either reflection 16 in a revised TBD or an agency position of some sort. 17 And that's what we were kind of looking for as a 18 19 punctuation point to some of these issues. 20 didn't sense, given all Ι of the

21 discussion -- we spent a great deal of time

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

discussing Mound, as you remember -- I don't recall having any remaining large technical issues, but we had a lot of questions of clarity, and maybe in terms of TBDs perhaps being a little more specific about certain questions that came up during Work Group discussion.

7 with So, that deals the February document, which I think we identify everything that 8 9 we looked at and kind of tried to be very specific about the particular questions that we have left 10 11 and tried to put a very specific reference into 12 transcript and what have you so there would be no 13 question where it came from.

14 That's sort of where we're coming from 15 on some of these, but I just wanted to make sure 16 it's clear that we don't sort of have a burning 17 issue so much as just a question of where did this 18 all come to, and where can it be reflected in the 19 record?

20 So on this first issue, again, there was 21 a lot of discussion about the different isotopes

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 and plutonium. And in particular, I think 241 came And this was probably in an ongoing discussion 2 up. 3 that took place five or six years ago on the internal dose TBD. And it was felt that there 4 5 ought to be a clearer treatment of 241 in the 6 matrix, particularly Table 511, I think, was the 7 location different where the isotopes were addressed. 8

9 And I think -- well, I'll leave it to 10 you, but that was kind of the question we had, was 11 it wasn't crystal clear where it was being 12 addressed, but I think what you're saying there is 13 the revision, the revised TBD, was expanded and 14 does have some very specific treatment of Pu-241 15 in it.

16 So I think we're fine with that. I 17 think we went back and just compared the two tables 18 and felt 241 certainly was expanded and was 19 included.

20 MR. DARNELL: I'm not going argue with 21 you agreeing with this.

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	MR. FITZGERALD: Yeah. Again, a lot
2	of this is just making sure we can put our finger
3	on the locations in the documents where I guess the
4	agency feels it has satisfied that particular
5	question. And I think we're fine with that.
6	CHAIR BEACH: Okay, Work Group
7	Members, any questions on that first one? I know
8	I went back and looked at that table, too, and saw
9	the update of it.
10	Paul, do you have anything? Any
11	questions?
12	MEMBER ZIEMER: No. This is fairly
13	straightforward.
14	CHAIR BEACH: Okay, I agree. Brad,
15	anything? Or Phil?
16	MEMBER CLAWSON: No, not at this time.
17	CHAIR BEACH: Okay, do we agree that we
18	should close this item, then?
19	MEMBER CLAWSON: Yes.
20	MEMBER ZIEMER: Yes. I agree.
21	CHAIR BEACH: Okay, then that is now

NEAL R. GROSSCOURT REPORTERS AND TRANSCRIBERS1323 RHODE ISLAND AVE., N.W.(202) 234-4433WASHINGTON, D.C.20005-3701

1 closed.

The next item is the tritides item. Joe, did you want to go ahead and give us a brief on these, too?

5 Matrix Issue #6 Tritides

MR. FITZGERALD: Yeah. We had a fair 6 7 amount of discussion on tritides, to say the least. And in that discussion there was, beyond the 8 insoluble tritides that was the real -- I think we 9 spent a year on that particular issue trying to 10 resolve the question of how one would treat them 11 12 in dose reconstruction. But there was also some 13 question about, well, what about the intermediate solubility tritides, titanium tritide was one of 14 15 those, which, of course, Mound handled.

And sort of the question was, okay, certainly the insoluble tritides were clearly a question of how one would address those. However, was there any thoughts on how we would treat something that wasn't quite as insoluble but still would present some questions or issues?

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	And I think in the transcripts of a
2	couple of Work Group meetings, and I think, Jim,
3	if was you that kind of said, yeah, certainly it's
4	a question. It's not something that's going to
5	hold up the SEC, but certainly that's something we
6	ought to at least give some thought to as far as
7	how we're going to address that in terms of dose
8	reconstruction.
9	So that got sort of parked in a Site
10	Profile parking lot, as we call it. And I went back
11	and I really couldn't find a final resolution of
12	that, and so this is really a I know we didn't
13	really have a disagreement. It should be somehow
14	looked at, but I couldn't find a formal resolution.
15	And I think, if I can paraphrase what
16	the NIOSH response is, is that there was some IMBA
17	runs that were run and this question was looked at,
18	but in the end and this is not too surprising
19	given the nuclide involved, or the isotope involved
20	it turned out that intermediate solubility
21	tritides resulted in what we would call negligible

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 would not in doses, that matter dose ones 2 reconstruction, given the less than rem, millirem 3 value that was ascribed to them. So this is sort of a moot issue, that 4 even if there was a need to come up with a DR 5 6 approach, the doses that were involved were so low 7 that it would not be one that you would do dose reconstruction for anyway. 8 9 I might add that even for the So 10 insoluble tritides, I think, in all that process, 11 we probably came up with only a few millirem in the 12 end for those as well. So, the bottom line is that 13 the doses that result are fairly, fairly low, and 14 in this case negligible and I think would make this 15 issue moot, Josie. 16 CHAIR BEACH: Okay. NIOSH, anything? 17 MR. DARNELL: I think we've pretty much 18 put this one to bed. 19 CHAIR BEACH: Yeah, I agree. I just want to make sure for the record we have this all 20 discussed out. 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	Anything, Paul, for you?
2	MEMBER ZIEMER: No. I agree with
3	that. I think we should close this issue.
4	CHAIR BEACH: Okay, Phil?
5	MEMBER SCHOFIELD: No.
6	CHAIR BEACH: Brad?
7	MEMBER CLAWSON: I'm good.
8	CHAIR BEACH: Okay. We recommend
9	closing the matrix issue 6 on tritides.
10	And then our next one is issue 3, or item
11	3, matrix issue 9, the high-fired Pu-238.
12	Matrix Issue #9 High-Fired PU-238
13	MR. DARNELL: I believe that one was
	already recommended for closure.
15	MR. FITZGERALD: Yeah, we recommended
16	at the last Work Group meeting that the Work Group
17	consider closure on that question.
18	The issue there was whether I feel
19	like I'm going through archival material now but
20	we had a Type L model that I think Los Alamos had
21	championed and we felt that had attributes that

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	ought to be at least available to the dose
2	reconstructor if need be, and I don't think there
3	was any disagreement on NIOSH's part, so I think
4	that issue went away.
5	CHAIR BEACH: Everybody agree with
6	that? I thought we closed it before, too. I just
7	wanted to make sure.
8	MR. FITZGERALD: Again, this is sort of
9	trying to come up with a bottom line from Mound and
10	make sure there was nothing left hanging. That one
11	I think we recommended, but it wasn't closed.
12	CHAIR BEACH: Yes. Paul, any
13	objection to closing that?
14	MEMBER ZIEMER: No.
15	CHAIR BEACH: Brad? Phil? Okay.
16	So there's several layers to the next
17	one. Item 4 covers matrix issues 11, 12, and 13.
18	There are several that we are going to talk about
19	and have recommended closure, and there's a couple
20	that we are going to hold until the end.
21	This very first one, the uncertainties

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 and low recovery of plutonium -- polonium, excuse me, bioassay procedures. That is one that SC&A has 2 3 recommended closure on, but we'll go ahead and just continue going through those. 4 MR. FITZGERALD: I'm not sure where we 5 6 are now. 7 CHAIR BEACH: Item 4. MR. FITZGERALD: Right, on polonium? 8 9 CHAIR BEACH: Yeah. 10 I think this one was MR. FITZGERALD: 11 again an issue of -- this got raised very early in 12 We went on to bigger and better the process. 13 things that had to be addressed more urgently on 14 internal dosimetry. But as you recall, there was some very lengthy White Papers involved on it, the 15 internal dosimetry TBD, you know, 75, 80, 100 pages 16 17 apiece. So there were a couple of items that 18 19 sort of got -- not overlooked, but we just never 20 got back to firm up what the positions were. In 21 this particular case, this was a question of the

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 chemical processing on polonium, whether somehow 2 in the DR process it was recognized that there was 3 a correction needed. Again, this is sort of a technical 4 detail sort of in the context of a TBD question. 5 6 And so I did put that in there just because I wasn't clear, looking at the TBD, exactly where NIOSH felt 7 this was addressed. 8 9 And I think in Section 5.5.11, which I 10 think Pete and his staff have outlined, they have 11 pointed to all the sections of the TBD that would 12 provide that correction. And also commented that 13 in the DR procedures or directions, general 14 directions, that's also addressed and has been since the early years. So somehow that wasn't 15 We didn't catch that. 16 clarified. But I think we're fine with that explanation. 17 And it helps knowing both the specifics 18 19 of the TBD as well as this DR procedure that takes 20 care of that correction on polonium. So that was kind of a technical loose end that we felt ought 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	to be clarified. We would recommend closure for
2	the Work Group.
3	CHAIR BEACH: Okay, any discussion on
4	that, Paul?
5	MEMBER ZIEMER: This doesn't actually
6	close the matrix item, does it?
7	MR. FITZGERALD: Just the issue.
8	CHAIR BEACH: No, just this issue.
9	Yeah.
10	MEMBER ZIEMER: Just the issue, right.
11	That's fine. That part should be closed.
12	CHAIR BEACH: Yeah, there's like nine
13	sections, so we would consider just the polonium.
14	MEMBER ZIEMER: Yes. Is it that we're
15	closing that part, that issue that part of issue
16	11, 12, and 13?
17	CHAIR BEACH: Correct.
18	MR. FITZGERALD: Recognizing that
19	large parts of 11, 12, and 13 were closed by the
20	Work Group going back four or five years ago. So
21	these are more or less what were left and parked

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	over as TBD issues to be done.
2	MEMBER ZIEMER: Right.
3	CHAIR BEACH: So anything on the
4	uncertainties on load recovery of the polonium,
5	that's the only
6	MEMBER ZIEMER: I agree to close that
7	portion.
8	CHAIR BEACH: Phil or Brad, all okay
9	with that?
10	MEMBER CLAWSON: We're all good.
11	CHAIR BEACH: Okay, so we agree to
12	close that section on polonium.
13	The next one is under the same matrix
14	issues items, other radionuclides data, SC&A data
15	comparison. So we're talking about other. And
16	there's quite a big write-up on SC&A on the issues
17	side.
18	MR. DARNELL: They ended with the magic
19	words "recommend closure."
20	CHAIR BEACH: Recommends closure.
21	I'm not so sure we didn't close that earlier, but

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 Joe, go ahead.

2	MR. FITZGERALD: Well, this is another
3	like I said, we will admit that we scrubbed the
4	record pretty thoroughly on Mound. And on this
5	particular point there was a question of whether
6	and this is kind of a prosaic issue and technical
7	details whether the units and the way some of
8	the other nuclides were listed would make
9	difficult, for comparison's sake, for the dose
10	reconstructor.
11	And we looked at the new TBD for
12	internal, and in most cases it's a lot clearer, a

13 lot of this. And granted, the first TBD was 14 developed back in 2004/2005, that timeframe. So 15 ten years later or so, I think the way things are 16 presented are clear and we think the enhancements 17 are sufficient for the issue here.

And this was made a Site Profile issue very early on because it really got into not so much a technical impediment to dose reconstruction; it was more of a this could be done better if you laid

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	out the information cleaner. It was one of these,
2	yeah, the TBD, when it's rewritten, it could be done
3	so it makes it easier. And I think it is written
4	better. So we would recommend closure.
5	CHAIR BEACH: Any discussion on this
6	one? Hearing none Paul?
7	MEMBER ZIEMER: This wasn't a
8	technical issue so much as just a clarity issue,
9	was it not?
10	MR. FITZGERALD: Yes, that's exactly
11	right. Again, even though it was something that
12	was mentioned, we had very early on said it would
13	be just something for the agency to consider as far
14	as future revision. And I think a lot of that has
15	been addressed in the most recent revision.
16	Matrix Issues #11, 12 & 13
17	CHAIR BEACH: Okay. So, item 6, which
18	is still in the matrix issues 11, 12, and 13,
19	secondary, other radionuclides data, MJW
20	evaluation. We'll go ahead and let Joe keep
21	talking.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 MR. FITZGERALD: Unless Pete wants to interject? 2 3 CHAIR BEACH: Unless Pete, yes. 4 MR. DARNELL: Go ahead. CHAIR BEACH: This is 5 one we've 6 discussed at length also. 7 MR. FITZGERALD: This is more -- this laboratory work. is like 8 is the And this 9 hesitating to wade back into the --10 The King document. CHAIR BEACH: 11 FITZGERALD: -- shark-infested MR. 12 This is the question of other Yeah. waters. 13 nuclides that figured in the laboratory work at Mound where -- and it didn't even bring up the King 14 15 I just figured I'd leave it out, but now Report. I've brought it back in. 16 17 So this gets back to some of the questions raised as to whether one could -- I think 18 19 early on there was a comment that one could not --20 I was going to say ignore, but not really address so much a lot of these exposure potentials on 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

nuclides in the laboratory. And that got us into a long discussion about the King Report not, obviously, explicitly looking at exposure potential, but just indicating what was in the rooms or in the labs.

And I put that in there, knowing that it would evoke some consternation, but just to say that it was still a question that I think needed to be finalized. In other words, that NIOSH indicates it was not ignoring the nuclides and did have a process to address them.

12 And I think the contingency that's indicated is that if, in fact, there's no dose 13 reconstruction method available for a particular 14 15 nuclide -- and that's certainly possible given the 16 spectrum that are being addressed or utilized in 17 those laboratories -- then there are instructions, 18 general instructions, that the dose reconstructor 19 presumably would bounce that back up to NIOSH, 20 probably to Jim, and that would be specifically 21 addressed nuclide-specific as а dose

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

reconstruction procedure. Something would have to be developed and it would not just simply be ignored, but would be addressed as it would come along. Of course, that presumes that you would have a clear exposure potential and that there would be some issue that would arise where you would need to do that.

So I think certainly is kind of what we 8 9 wanted to address, that there is an avenue that you 10 can address these things, even if right now a priori 11 you can't presume a potential because of the King 12 It's just saying it was there and if it Report. does come up and somebody points, to our somebody 13 comes in with a CATI or comes in with a claim that 14 15 says I worked in the lab and I was exposed to nuclide X or Y and there's some evidence that there's some 16 17 exposure data, then there's an avenue.

Again, this was just a -- because we went back and forth with the King Report. I think it was more philosophy than it was a discussion of what exactly what happened. And this is sort of

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	saying, okay, quite apart from the philosophy of
2	the King Report, what would happen if you had to
3	address any of these many nuclides that might arise
4	in the lab? And I think your answer is this.
5	MEMBER ZIEMER: Quick question. As a
6	practical matter, have we, in fact, encountered
7	such a situation and while the dose reconstruction
8	is done there?
9	MR. DARNELL: As of yesterday, I
10	haven't found any.
11	MEMBER ZIEMER: Remind me how many does
12	reconstructions we've completed out at the Mound
13	facility?
14	MR. DARNELL: Hold on a second. I
15	didn't write that number down.
16	MEMBER ZIEMER: I mean, it's a pretty
17	large number.
18	MR. DARNELL: Oh, yeah.
19	CHAIR BEACH: So you haven't ran across
20	anybody that has said they worked in the lab and
21	they were exposed to

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1	MEMBER ZIEMER: Something different
2	from that group.
3	CHAIR BEACH: something different,
4	something exotic?
5	MR. DARNELL: No, but you've got to
6	remember that's just me looking through. I won't
7	say that I have 100 percent coverage all the
8	MEMBER ZIEMER: Well, of course, the
9	point here is there is an avenue if you come across
10	it. I was just pointing out, as a practical
11	matter, we've done an awful lot of dose
12	reconstructions and it hasn't occurred yet.
13	MR. DARNELL: There's 761 total,
14	complete or 761 total dose reconstructions; 656
15	are complete; 30 are active; 75 are pulled.
16	MEMBER ZIEMER: Okay.
17	DR. NETON: I thought this really spoke
18	more to if you encounter bioassay data in the record
19	for these so-called exotics that aren't mentioned
20	in the Site Profile, what are we going to do with
21	them, because there wouldn't be such outlined as

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 the detection limits and that sort of thing. So I think what we're saying here is 2 3 that those are handled on a case-by-case basis. You run across an exotic radionuclide bioassay 4 result that's not covered in the TBD, we'd have to 5 6 find a way to do it. The principal internal dosimetrist would weigh in on that decision, kind 7 of work its ways through the chain, but it just 8 9 wouldn't be ignored because we didn't have a 10 methodology in the Site Profile. 11 MR. FITZGERALD: Who is the principal 12 internal dosimetrist? That's Liz, Liz Brackett. 13 DR. NETON: 14 MR. DARNELL: The dose reconstruction look more like of 15 would some the AWE dose 16 reconstructions where the site information was put into the dose reconstruction --17 It would be fleshed out in 18 DR. NETON: 19 the dose reconstruction rather than referring to a section of the TBD, in accordance with sections 20 21 of the TBD, it would actually, the methodology

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 would be --

2	MR. FITZGERALD: That's helpful. I
3	just never thought we got to that point because it
4	was, like I said, we were sort of tied up in the
5	King Report discussion.
6	MR. DARNELL: From what I was reading,
7	both sides of this issue had gotten to a certain
8	point. One was asking for concrete evidence that
9	it existed. The other was saying, give us this
10	road map. And we got to the road maps and
11	DR. NETON: I don't think this was
12	really about the King Report.
13	MR. FITZGERALD: No, no, no. I didn't
14	want to get back there.
15	DR. NETON: The King Report is water
16	under the bridge. This has to do with, if you see
17	these nuclides
18	MR. FITZGERALD: I wanted to change the
19	subject a little bit on that, because I think the
20	practical question was, okay, quite apart from the
21	King Report saga, exactly what would you do if you

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	did come across it? And I think that satisfies
2	that. And the fact that you mentioned that you
3	hadn't come across it also is important.
4	MR. DARNELL: But I do want you to know
5	I've not looked at 100 percent of every single DR
6	and gone through and sampled and looked for.
7	(Simultaneous speaking.)
8	MR. DARNELL: This whole wonderful
9	team of ORAU that does the dose reconstruction,
10	they see what's in the documents before we could
11	even get to them.
12	CHAIR BEACH: Okay, so there's a
13	section in the internal TBD that covers that, 5.9.
14	And then you've got the lead dosimetrist if there's
15	an issue beyond that.
16	MR. DARNELL: Yes. The way it
17	generally works is it will go from the dose
18	reconstruction to the lead dosimetrist, and if
19	there's any issues there, it comes across to us.
20	We provide guidance and it goes back down to the
21	dose reconstructionist. And all that

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	information, as a matter of course, will get put
2	into the dose reconstruction because it's not in
3	a Technical Basis Document.
4	CHAIR BEACH: Okay. Paul, any other
5	further questions on this one?
6	MEMBER ZIEMER: No, I'm comfortable
7	with this.
8	CHAIR BEACH: Brad and Phil?
9	MEMBER CLAWSON: No.
10	MEMBER SCHOFIELD: No.
11	CHAIR BEACH: So we agree to close this
12	portion of secondary other radionuclides.
13	Okay. The next one is the tritium log
14	books missing for 1976, 1977. I believe we closed
15	that with the 83.14.
16	(Simultaneous speaking.)
17	DR. NETON: Yeah, the SEC.
18	CHAIR BEACH: So I don't think we need
19	to discuss that, unless somebody sees something
20	different there.
21	And then the tritium bioassay data

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1	bounding method for STC addresses SC&A's original
2	concern. I wasn't sure if we had already closed
3	this one or not.
4	MR. FITZGERALD: No. A lot of these
5	were I think discussed, but not necessarily closed
6	out. And I think on let me go back to this one.
7	Yeah, we recommended closure on the
8	question of whether there was enough adequate
9	bioassay data to support the tritium itself.
10	MR. STEWART: Are we on issue 7 or 8?
11	MR. FITZGERALD: We're on 8.
12	MR. STEWART: But we closed 7, is that
13	correct?
14	CHAIR BEACH: Seven, with the 83.14,
15	yeah, that took care of that one.
16	MR. STEWART: So that is closed.
17	CHAIR BEACH: Yeah. So this one
18	MR. FITZGERALD: On tritium bioassay
19	data adequacy, we originally raised this concern
20	and this is going back to 2009, so this actually
21	seven years ago. And we raised a concern that the

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

algorithm used to determine early tritium dose was adopted from a LANL procedure based on estimating whole body dose in tritium in water. And it was based on HTO and other compounds and did not address clearly STCs and organically-bound tritium that might be present at Mound.

7 And in the response that we got in 2012, 8 this came a year or two later to our issue, I think 9 at that time NIOSH noted that it had obtained 10 tritium bioassay logbooks. This is where the 11 logbooks came into the case. And therefore had 12 access to the raw data itself, primary data.

13 So the issue, when the logbooks I think 14 were made available as primary data, this question 15 of relying on the secondary bioassay database, I 16 think that mitigated that question.

And in terms of the STC compounds, we spent a lot of time on that, but on this particular issue we recommended closure at the last Work Group meeting, but I don't think it actually got closed out.

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	CHAIR BEACH: Yeah, and there's two
2	parts to this. One part of it we're not closing,
3	we'll discuss it later, and that's the question of
4	the Class YY. So, not to be confused, this small
5	portion of it, I think you're right, we did
6	recommend closing that one.
7	MR. FITZGERALD: And it wasn't right
8	away, but I think over the year or two that we spent
9	on the tritide issue and the question of how one
10	would define a class with logbooks as the primary
11	data, I think that issue did go away. It was raised
12	and then we never got back to it, but it sort of
13	is made moot by the resolution of the tritide

14 question.

15 So that's kind of -- and when I went 16 back, I was looking for anything where we just --we 17 discussed it, but didn't actually close it out, and 18 this was one of those.

CHAIR BEACH: Okay, discussion on this
 portion of it? Paul, anything from you?
 MEMBER ZIEMER: No. I agree to close.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 CHAIR BEACH: Okay. I agree with 2 that. Phil, Brad? 3 MEMBER CLAWSON: We're good. 4 CHAIR BEACH: You're okay with that. So that is 8. 5 6 And 9, we're going to reserve. Ten 7 we're going to reserve and move to 11. So, item 8 11, page 5 of 11 and it's the fecal bioassay data. 9 MR. FITZGERALD: And this one, this 10 again goes back to the original 2009 treatment that 11 developed internal dosimetry we on data 12 completeness. The issue there data was а 13 completeness question addressing what we thought were relatively few fecal results in the PURECON, 14 15 which is the plutonium urinalysis bioassay In this case, 29 fecal samples for 12 16 database. 17 individuals was pretty much it. And our question was, what was NIOSH's 18 19 position on the very few samples, fecal samples that were available for use. 20 And I think the answer during Work Group discussions was NIOSH 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	wasn't intending to use the fecal data anyway. So
2	the whole thing was sort of rendered moot.
3	And the only question that was sort
4	of in passing in the discussion of the Work Group
5	meeting. And this really addresses what, more
6	specifically, would the agency's position be on
7	that data? That it doesn't intend to use it, but
8	how does it play into a dose reconstruction if
9	somebody has it, given the question surrounding
10	that data?

11 And I think the response, if I can 12 paraphrase -- and Pete, jump in -- that that still stands, that the reliance will be, quote, primarily 13 on the urinalysis data. But if the fecal data is 14 15 available for an individual, you're not going to ignore it, but you have to reconcile it, and I think 16 that's the term you use, with the urinalysis data 17 that might be available. 18

So it would contribute to the dose reconstruction, but wouldn't be relied upon. I think that's the emphasis.

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	MR. DARNELL: That's exactly correct.
2	MR. FITZGERALD: And we certainly
3	don't have an issue with that. But I think we'd
4	want a little more clarity on that, because it was
5	sort of one of these passing things where it was
6	a never-mind in the discussions, sort of saying,
7	well, it's just not going to be relied upon, but
8	it was never really hammered out more specifically
9	than that. So I think this is much clearer. So
10	I would recommend closure on that by the Work Group.
11	CHAIR BEACH: Any discussion on that?
12	MEMBER ZIEMER: Question for the DCAS
13	staff: have there ever been any cases where there's
14	only fecal data? I don't think we've seen any,
15	have we?
16	MR. DARNELL: Not that I'm aware of.
17	Don is shaking his head that he doesn't know of any
18	either.
19	MEMBER ZIEMER: There would always be
20	urine data if there was fecal as well.
21	MR. STEWART: For Mound, that is true,

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

At least I have not seen a case where that 1 yes. 2 is not the case. 3 MEMBER ZIEMER: Okay, good. Thanks. 4 CHAIR BEACH: Okay, any objections? So we'll close that item. 5 6 Alright, the last, 12, item 12, the 7 tritium HTO data comparison. Again, not to be This one might be a little confused with the YY. 8 9 more discussion because we recommended that NIOSH provide a summary of how it conducted the V&V of 10 11 the internal and external. 12 Well, I think, in this MR. FITZGERALD: 13 case, this is part of the broader validation and 14 verification of data adequacy and looking at 15 plutonium, polonium, tritium, some of the major source terms. 16 And the response for tritium is 17 that, as we understood, as the process went 18 forward, that when the logbooks were identified, 19 Ι think NIOSH's position was reliance on the for the primary record rather 20 loabooks than 21 necessarily the electronic record, just because

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	whenever you have the primary, that's the gold
2	standard. It's the original data. And that was
3	the basis for the SEC as well.
4	So, in this case, in terms of we were
5	asking for a broad V&V, but I think we're okay, as
6	one could expect, in terms of, if you can rely on
7	the primary record, that it doesn't get any better
8	than that.
9	So I don't think we had an issue in terms
10	of V&V. I mean, V&V comes into place when you're
11	using secondary sources like electronic databases,
12	whatever. When you're relying on the primary
13	source, the validation is not as much of an issue.
14	You might have questions of legibility, but, again,
15	it's not going to be quite the same issues we have
16	for the electronic.
17	So I would just tell the Work Group that
18	this issue, as a piece of the V&V, sort of became
19	not a question once the decision was made to go with
20	the logbooks as opposed to the electronic record.
21	This is for tritium, though, just tritium.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	CHAIR BEACH: Okay.
2	MR. FITZGERALD: We've already gone
3	through the tritium logbook validation. That we
4	discussed at some length during the SEC discussion,
5	so I don't think there's an issue there.
6	CHAIR BEACH: Right. Okay,
7	discussion on that one? Paul, Brad, Phil, for
8	tritium, item 12? Does everybody agree to close
9	that?
10	MEMBER ZIEMER: I would agree on that.
11	CHAIR BEACH: Okay, so we agree to
12	close that. What time is it? Oh, goodness, we're
13	going right through these. Is it time for a break?
14	(Laughter.)
15	CHAIR BEACH: Okay, so back to item 9
16	and it's issues of the plutonium data comparison,
17	the PURECON. And I guess maybe should Peter go
18	through the V&V paper first? Because those all
19	everything we have left are issues that fall within
20	your V&V paper there.
21	DR. NETON: We've got issue 13 here.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 MR. FITZGERALD: Oh, yeah, 13 hangs out 2 too. 3 CHAIR BEACH: Did I miss that? 4 MR. FITZGERALD: But we can deal with 5 that after V&V. 6 DR. NETON: Okay, that's fine. 7 CHAIR BEACH: Yeah, that's part of it as well. So we have nine -- what do we have, 9, 8 9 10, and 13 that are all open and all pretty much 10 follow --11 I think 9 and 10, I MR. FITZGERALD: 12 mean, it's PURECON and PORECON, if I can use those 13 terms, polonium and plutonium electronic database verification. 14 15 CHAIR BEACH: Thirteen was in there, 16 too. 17 MR. FITZGERALD: And just for 18 background, I think this is kind of a standard 19 question that we've raised in all the SEC discussions as far as the databases were concerned 20 21 as far as whether NIOSH has validated the adequacy

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	and completeness of the databases that are being
2	relied upon. In this case, you had PORECON and
3	PURECON were two databases that were set up.
4	Now, this is sort of an interesting
5	question. I think there's no debate that they're
6	not complete per se, and so that's one reason it
7	came up early. But we never really had an
8	opportunity to, I guess, collectively reach a
9	conclusion what the validation answers were for
10	those databases from the agency standpoint. I
11	guess we're aware that MJW did some validation with
12	was it PORECON?
13	MR. STEWART: PURECON.
14	MR. FITZGERALD: PURECON. Okay, they
15	did some original work in 1998. But now we're just
16	sort of saying, okay, in the final analysis, how
17	is NIOSH satisfied that those databases are in fact
18	complete and adequate for reliance in the dose
19	reconstruction process? And that's kind of where
20	the genesis of, you know, where did NIOSH come out
21	on that. I know you've

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 MR. DARNELL: Really, just cutting to the chase, NIOSH is not using PURECON and PORECON 2 3 as the primary data for dose reconstruction. We're going back to the records, back to the source 4 documents. We're using PORECON and PURECON more 5 6 as references than we are as the data for dose 7 reconstruction. In that case, we don't generally go back and validate references that were used. 8 9 Now, we can talk about what MJW did as their V&V, which was essentially 100 10 far as After they found the error rate was 11 percent. 12 initially too high, they went back and checked 13 everything. 14 But as far as what you're asking for, 15 it's assuming an application that we're not 16 actually doing with these two databases. So, 17 NIOSH basically doesn't see the need to go back and do a V&V on the reference that we're using just to 18 19 kind of bounce our records off of -- dose reconstruction records off of. 20 MR. FITZGERALD: Yeah, and I think the 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	clarification that would be helpful and I think
2	you've addressed it here, but just to underscore
3	that, when you say reference, you're not using it
4	as a basis for dose reconstruction. You're using
5	it, as you say, as a comparison point. I just want
6	to how does that work?
7	CHAIR BEACH: I was going to ask that,
8	too, because you said bounce off. So maybe walk
9	us through
10	MR. FITZGERALD: I always understood
11	there was some
12	MR. DARNELL: Don's a little closer to
13	
14	MR. STEWART: The way it appears in a
15	dose reconstruction, you'll get a group of records.
16	In some cases those are MESH printouts and in some
17	cases they are in some other form as well.
18	Sometimes they're in a logbook form or whatever.
19	In fact, what we get from Mound are the employees'
20	dose records. So these are the results that Mound
21	sends to us. And sometimes they are in the form

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 of MESH databases.

2	MR. FITZGERALD: Yeah, but my
3	understanding is that the MESH does incorporate
4	some of that PORECON/PURECON data for the years
5	that it's relevant or available, and you wouldn't
6	be able to easily distinguish where it's actually
7	feeding into MESH.
8	MR. STEWART: That's correct, yeah.
9	That's correct. MESH, I believe and correct me
10	if I'm wrong here was a work in progress for many
11	years, because it really only came along in 1989.
12	But it closed in 1996. So, many of the records have
13	not been and the intent was that it would be their
14	single reference point for dosimetry data. But it
15	never got to that point. And it never got to that
16	point for polonium. So the polonium project was
17	essentially complete in 1973, so they didn't
18	necessarily get all those records into MESH. But
19	the PORECON database was there.
0.0	

MR. FITZGERALD:

21 MR. STEWART: That was put together.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

Right.

(202) 234-4433

20

1 So, yeah, you're right, but the DR would not necessarily know where it was coming from. 2 But in 3 some cases, you'll have duplicate records from several of these data sources. And this may not 4 be generally known, but when we first look at a 5 6 case, we have people go through the records and they will summarize the records that are there. 7 And they put together what's called a biofile, and it's 8 9 the bioassav data is transcribed into а 10 spreadsheet. So you can see where it comes from 11 and what page it's on in the DOL file that you get 12 So I will see sometimes three and four returned. 13 listings for the same result.

14 Now, they can be in different units and 15 other things like that and I have to go reconcile 16 that, but one of those might be MESH and one of them 17 might be PURECON and one of them might a hand So I have to go figure out which are the 18 record. 19 right units and figure out which of those records So it's my job as the DR to figure out 20 to use. what's the best record. 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	MR. FITZGERALD: I guess, again, the
2	original question was, if one is using, or could
3	use, an electronic file from a site, would NIOSH
4	as a policy matter do a validation of that
5	electronic file to validate the completeness and
6	accuracy of it?
7	MR. STEWART: We don't get electronic
8	files. We get printouts.
9	CHAIR BEACH: From an electronic
10	source.
11	MR. FITZGERALD: Well, going back to
12	the sites, the original data. That's the point I
13	and we're going what site are we going back
14	on? We're going back on the validation on another
15	site for the same reason, you know, that's
16	something that's sort of a data pedigree issue
17	almost. And I think it's pretty well accepted at
18	this stage of the game that the agency will do that
19	for the site.
20	MR. DARNELL: Are you talking about
21	INL?

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 MR. I'm FITZGERALD: trying to 2 remember what site. I'm blanking because we have 3 so many sites now. We're going back now and trying to backfill a bit validations, because it wasn't 4 5 done originally for some of the data. 6 In this case, when I looked at this, I 7 said, yeah, we did find-- I mean, MJW, it's not too hard to do -- in the beginning that there were some 8 9 deficiencies in the database. And my understanding was it was only -- it wasn't for all 10 11 It was only for certain years, but it was vears. 12 being fed into either MESH or being used. 13 So the question is a very basic one. If it's being used, did somebody go back and validate 14 the completeness and adequacy? Obviously, for the 15 PURECON, MJW did the heavy lifting pretty much 16 17 already, so a lot of that is pretty much done. PORECON, I'm not clear on really who, if anybody, 18 has done that. But if it's being used, I would 19 think that, as a matter of policy, NIOSH would 20 21 consider V&V to be something that would be done.

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	When I saw the reference database, I
2	didn't know what that meant, because either it's
3	being used or it's not being used. It's either
4	being relied upon or not being relied upon. And
5	it's not really a gray issue, it's sort of is it
6	or isn't it?

7 If it is, I think by precedent the validation is something that is just done to make 8 9 sure that you're not using data that's incomplete 10 or has deficiencies which would mitigate against 11 its being relied upon. If it had deficiencies, you 12 would probably take it off the spreadsheet and say, you know, this just isn't good enough, rely on 13 everything else if you can. 14

15 Τf it can't be taken off the spreadsheet, then you'd want to be sure that it was 16 17 at least minimally adequate for the dose Or if it had certain holes, you 18 reconstructor. 19 might want to put the asterisk and say, okay, you can use this, but you're going to have to use it 20 in coupling with maybe bioassay data, as well, so 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 that it would be corroborating information to go
2 with it.

3 It just seems like you have to have sort of a systematic approach to it, not just sort of, 4 well, we didn't validate it, but it's just there 5 6 as part of the menu. A dose reconstructor wouldn't 7 know that, wouldn't know if it had been validated They would just choose from column A or 8 or not. 9 column B depending on what was available, and that would be an individual choice, I would assume. 10

Right.

11 MR. STEWART:

12 As I understand, and it's MR. DARNELL: 13 in the paper, the primary and secondary records 14 that come with the claim are what's supposed to be used first to develop the biofile that Don spoke 15 16 about. PORECON, PURECON, MESH, those databases 17 can be used to draw from but they're not the primary 18 reference. They're not what's being used to 19 develop the file.

20 CHAIR BEACH: It sounds like you're 21 getting records, but you're not sure where they're

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 coming from if you're just getting a printout. Is
2 that --

3 MR. STEWART: Well, I assume we get an 4 Excel spreadsheet, but I never trust an Excel It tells me where the data comes 5 spreadsheet. 6 from, so I go back and look at the original records. 7 It might be a hand record. It might be a -- and it's a little confusing because are talking about 8 9 polonium here?

10 MR. FITZGERALD: That's one of the 11 source terms.

12 Well, it's different. MR. STEWART: 13 The PURECON database was created and then 14 validated. And it was uploaded to MESH. Okay? 15 So you it's in MESH, it's been validated. So we 16 might see the PURECON printout or we might just see 17 MESH, right? But whatever is in the record, we 18 don't know always know what it is when we see it 19 in the file. We know when it's a handwritten 20 loqbook.

MR. FITZGERALD: Yeah, because when

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

21

1 the claim comes in, I think you get what you get. 2 Some claims would be maybe pretty complete 3 depending on the timeframe. Others may be less complete and you do the best you can with each 4 5 individual case. 6 MR. STEWART: We don't think any are 7 incomplete. We don't see a lot of cases where 8 they're incomplete. They are just maybe different 9 kinds of records. Different kinds of 10 MR. FITZGERALD: 11 records. 12 Depending on the era. MR. STEWART: 13 DR. NETON: I guess the question for me 14 is, what is the primary record that the DOE is 15 providing us for things like polonium and these other radionuclides? 16 I mean, if it's just the PORECON database, I think it's a valid point that 17 we at least haven't described how it was validated 18 19 when MJW created it. 20 But if it is true that the DOE goes back, 21 where are we getting these now, Legacy Management?

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	I don't know where they're coming from. Goes back
2	and gets us the hard copy records for polonium and
3	other radionuclides that are in the person's file,
4	then PORECON it's not as big as a problem to
5	validate the PORECON database. I guess I'm not
6	clear in my mind.
7	MR. DARNELL: You had me thinking one
8	way when we wrote the memo and now I'm wondering
9	which
10	MR. NETON: Okay.
11	MR. DARNELL: I think what we need to
12	do is, on PORECON, come up with a better some
13	more data on this. We need to take an action item
14	to do this.
15	DR. NETON: It seems we need to flesh
16	that out better.
17	MEMBER CLAWSON: My question is which
18	data have looked at or are we reading?
19	DR. NETON: Exactly.
20	MEMBER CLAWSON: What is it?
21	DR. NETON: That's what we need to

1	flesh out, because it's not clear to me, based on
2	what we wrote here, that we're describing the
3	process properly or adequately.
4	MR. DARNELL: What I thought existed
5	before the meeting and what Don is saying now we're
6	slightly different, so we need to go back.
7	DR. NETON: I think we all agree that
8	polonium data are probably okay.
9	(Simultaneous speaking.)
10	MR. FITZGERALD: I think it's just
11	NIOSH adopting MJW's validation as being adequate.
12	And I think we had, per the historic record, that
13	MJW did it in '98, but not any position on your part.
14	DR. NETON: I'm assuming that when MJW
15	develops a polonium database they had some sort of
16	business rules they applied as well and it wasn't
17	sort of willy-nilly, just throw it in there, you're
18	done. So we need to go back and look at that, and
19	then we also need to go back and look at what records
20	we really do get from DOE when we request an
21	employee's bioassay records.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	MR. STEWART: Can I just summarize
2	again? Plutonium is kind off to the side for this
3	point, so I want to talk about polonium.
4	When I look at a polonium result, I will
5	typically see MESH results that are from the
6	PORECON database. I will also see primary
7	records, for the most part, in that, because
8	polonium was monitored from '48 to '73, and those
9	are the eras of hand records. So in those files,
10	I will see handwritten results.
11	MR. DARNELL: That's not what you said
12	when we started.
13	MR. STEWART: I'm sorry, yeah. I will
14	see handwritten results for polonium, typically,
15	because that's how they did it in those days. The
16	Mound files tend to be complete, and I'm sorry I $% f(x) = f(x) + f(x) $
17	left this out before, but because it was an earlier
18	era, that's all they had. They had the logbooks
19	to go back through.
20	And when I look at that Excel
21	spreadsheet, it will list that result, because they

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 list every result and they will through a page and 2 they will put all the results from the PORECON 3 database and then they'll go back, you know, page 63, you know, 50 pages further on and they'll find 4 a primary record for that. 5 6 So what I typically do is sort by date 7 and I'll see result, result, result on that same day and I'll say, how are those results different? 8 9 Okay, well, one of them is the primary record and 10 one of them is PORECON and one of them might be 11 something else. And so I'll go through and I'll 12 look at it and make sure that the units agree with 13 what I expect to be there, and then I'll use the 14 data that conforms to the TBD. Is that a little 15 clearer? Right, it's still not clear 16 DR. NETON:

17 in my mind, though --

18 MR. DARNELL: It's not saying that you
19 use the handwritten --

20 DR. NETON: Right, the handwritten 21 record is the only source of information that's

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	used. If that were true and we can verify that the
2	DOE provides all the handwritten records they have,
3	then the database validation is not necessary.
4	MR. DARNELL: Maybe I got it wrong when
5	I was listening, when we were developing this
6	paper, but that's what I thought was going on. We
7	saw the handwritten records. We used those. We
8	reconciled the reference databases. If that's not
9	the case, then we need to look more carefully.
10	MR. STEWART: Well, when I use the
11	handwritten records, I might again, I might see
12	three different entries for that bioassay, that
13	particular bioassay, and they all have the same
14	numbers. So, you know, I will use that
15	information. Sometimes the numbers are
16	different, sometimes there are more significant
17	figures, but I'll go back and figure out why they're
18	different, if they're different. So, you know, I
19	guess what I'm saying is that the DR is validating
20	that entry right there.

DR. NETON: I still think we need to go

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

21

1	back and ask the question of what records are they
2	assembling for us? And if we're always getting the
3	hard copy records for the polonium and other
4	radionuclides, then that's fine. But I'm not sure
5	I'm hearing that, short of someone going back and
6	looking at the hard copy records and saying that's
7	all of them and there's nothing, no discrepancies.
8	You wouldn't even need to look at PORECON, I guess
9	that's what I'm saying.
10	MR. STEWART: We don't need to. We
11	don't need to.
12	MR. FITZGERALD: Well, the question is
13	also sort of procedural for the DR, dose
14	reconstructor. Is it clear that, if that were the
15	case, that they would not look at PURECON, which

17 we're talking about.

16

18 MR. STEWART: Again, when I look at a 19 result in the spreadsheet, I won't necessarily know 20 where it's from. I'll go back and I'll look at the 21 reference page and it might be PURECON and it might

would take it off the table, which I think is what

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 be something else.

2	MR. FITZGERALD: That's my concern,
3	that it might not be easy for the dose
4	reconstructor. You know, you're trying to get
5	these things done. You may not investigate the
6	source so much. And in the end it may just be
7	easier just to confirm that MJW V&V'd PURECON
8	I'm sorry, PORECON, and not have to worry about what
9	the DR does. There's different ways to kill it.
10	MR. STEWART: Again, I'm not going to
11	query that database and put the result
12	electronically anywhere. I'm going to see three
13	results. They are all three picocuries per liter.
14	Which one of those am I using? I'm using them all
15	because they agree.
16	MEMBER SCHOFIELD: So what do you use
17	if there's a conflict between them?
18	MR. STEWART: You've got to
19	investigate that. But the answer is, if you can't
20	figure it out, use the highest one.
21	CHAIR BEACH: That's what I was going

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 to say.

2	MR. STEWART: This is dose
3	reconstruction. It's not a doctoral
4	dissertation. I mean, you could figure that out,
5	but why would you want to do that? Let's just
6	overestimate it.
7	MR. KATZ: If that's the procedure that
8	you've always had
9	MR. DARNELL: What we're saying, then,
10	is we use the handwritten records unless one of
11	these other references has a higher value, then
12	we'll use the higher value to be conservative.
13	MR. STEWART: Correct.
14	CHAIR BEACH: Or like you said, you'd
15	go investigate it.
16	MR. STEWART: Yeah. The DR needs to
17	resolve that, because it would be nice to just
18	electronically take all those results and say I
19	trust them and put them in there. But the fact of
20	the matter, if you have three results and they don't
21	agree, then you've got to figure out why. Or

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 you've got to overestimate it.

2 MEMBER ZIEMER: Is that clear, that all 3 dose reconstructors would do that, in the 4 procedure?

It's 5 MR. DARNELL: not currently 6 written that way in the Technical Basis Document. 7 The Technical Basis Document says that the dose reconstructors should keep in mind that both gross 8 9 alpha and alpha-spectrometric programs were used to detect and that they need to verify the PORECON 10 11 database against the written facts.

So what NIOSH needs to do is basically say what Don just explained is going on with the PORECON database, which is we use the primary written record first, reconcile any difference between the written record and the databases, and in the last case fall to the most conservative number.

19 CHAIR BEACH: But that's not really 20 what I'm hearing Don saying that happens. He just 21 gets his records and looks at the records. He's

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	not using the handwritten records as primary. I'm
2	not hearing that at all.
3	MR. STEWART: Necessarily.
4	CHAIR BEACH: Necessarily.
5	MR. STEWART: Right.
6	CHAIR BEACH: So where we're at, we
7	have the handwritten records, we have MESH. We
8	have PURECON and PORECON, right? We know that MESH
9	was V&V. I think SC&A did that.
10	MR. FITZGERALD: We sampled.
11	CHAIR BEACH: Sampled it. PURECON,
12	MJW did that. PORECON has not been done. And I
13	don't think we ever do anything with handwritten
14	records, correct?
15	MR. STEWART: Well, as I understand it,
16	validation and verification is simply looking at
17	the electronic database, taking it back to the
18	handwritten records and verifying that all that
19	information ended up in the electronic database.
20	CHAIR BEACH: Yeah.
21	MEMBER ZIEMER: But if the electronic

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 database showed a higher number, one could still 2 argue that that handwritten record is the basis and 3 should be used. MR. STEWART: You could do that. 4 MEMBER ZIEMER: Well, I think there's 5 6 ambiguity here. I sort of agree with Jim, if we 7 can figure out exactly what --DR. NETON: I don't think 8 I agree. 9 there's a lot of work involved here, hopefully. Ι 10 think it's a matter of going back and documenting 11 better what we actually do. And if it sounds like 12 what I hear what we're doing, we should be okay, 13 but I think this could be handled in a couple pages of discussion about --14 15 Okay, so you'll take the CHAIR BEACH: 16 action on doing a sampling or what is it? 17 MR. DARNELL: I think what we need to do is just clarify what's being done. 18 How we're behaving, what 19 DR. NETON: we're doing. And if it's going -- as Don has 20 discussed, if it goes that way, I don't think we 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	need to do any sampling.
2	CHAIR BEACH: Okay.
3	MEMBER ZIEMER: Is that described in 10
4	or is that in 9?
5	MR. FITZGERALD: That's 9.
6	MR. KATZ: It's 9 and 10.
7	CHAIR BEACH: We were just talking
8	about the paper, the memorandum, but, yeah, it does
9	cover.
10	MR. FITZGERALD: We can get to 10.
11	Actually, we can do PURECON first.
12	(Simultaneous speaking.)
13	MR. STEWART: Now, just a question
14	here: as I understood it, PURECON we don't have a
15	problem with because it has been V&V'd.
16	MR. FITZGERALD: Yeah, well, the issue
17	there is more of an institutional one. MJW, a
18	contractor, did the validation back in '98 and the
19	only question is, does NIOSH accept that validation
20	for the results it achieved and that would stand
21	as that's just really a confirmation.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	DR. NETON: We can state that.
2	MR. FITZGERALD: You can state that for
3	the record? I think it was a historical footnote
4	in our discussions in the past that they had done
5	that.
6	DR. NETON: It was a 100 percent
7	validation, so I don't know how much better you
8	can't do any better than that, in opinion.
9	MR. FITZGERALD: Right.
10	MR. STEWART: So that will remain open
11	as well about PURECON?
12	MR. FITZGERALD: That's up to the Work
13	Group. I mean, if you want to deal with PURECON.
14	That's the MJW validation we did in '98.
15	CHAIR BEACH: I was just going to look
16	at that real quick again.
17	MR. FITZGERALD: I think there was some
18	concern by them originally that the error rate was
19	a little high, so they went back and did a scrub,
20	100 percent scrub.
21	CHAIR BEACH: Yeah.

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	DR. NETON: I think we can handle it all
2	in the same discussion about the database and
3	comment in our response that we are accepting the
4	validation that was done by MJW because it was 100
5	percent validation. And we'll go back and look at
6	the it may be true. I don't know, are we getting
7	the hard copy polonium records, plutonium records,
8	too, then?
9	MR. STEWART: Yes.
10	DR. NETON: So we need to go back and
11	describe the process, how we're doing this and how
12	decisions were made when we get this record from
13	the Department of Energy.
14	MR. STEWART: Okay.
15	DR. NETON: And if it's as I think it
16	is, I think we're okay and probably can do this in
17	a couple page discussion.
18	MR. FITZGERALD: Just to put an
19	editorial note, Josie, in terms of the PURECON
20	discussion. MJW did do 100 percent for this
21	because they thought 8 percent initially as an

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 error rate on transcription. They went back and did a 100 percent scrub and found 4 percent. 2 But 3 then they actually corrected the record using the primary records to correct the electronic records 4 and eliminated those errors. But, again, that 5 6 sort of underscores the importance of looking at V&V, because I think they were probably a little 7 surprised when it was 8 percent. That's a pretty 8 9 darn high transcription error rate.

So it would be useful to either take 10 11 PURECON -- oh, I'm sorry, PORECON off the table, 12 or certainly make sure that it's not likewise a 13 problem. And it may turn out, I haven't seen 14 anything in the record that MJW -- I didn't see any 15 results that MJW did a V&V on PORECON. It seems they would have, particularly after the PURECON 16 17 experience, but I haven't seen it.

18DR. NETON: They didn't create the19PURECON. That was an inherited Legacy database.20MR. FITZGERALD: Right.

DR. NETON: They actually created the

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

21

1	PORECON database.
2	MR. FITZGERALD: Good point.
3	DR. NETON: So it's a little different.
4	MR. FITZGERALD: Yeah, internally,
5	they probably would have done QA of their own work,
6	yeah.
7	DR. NETON: But I do agree we need to
8	flesh this out a little bit.
9	MR. STEWART: There is some detail
10	available on how they develop that database.
11	DR. NETON: Yeah, and you don't know
12	when it's an 8.2 percent, what that really means.
13	I mean, does that all affect dose reconstruction?
14	Is it a result, is it a transposed, you know we
15	can discuss that a little better.
16	CHAIR BEACH: Okay, so you've got the
17	action on that. That takes us to anybody need
18	a comfort break at this point?
19	Hearing none, okay, so we're going to
20	leave 9 and 10 open, correct, until we review that
21	paper? Is that agreeable to everybody?

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

RNELL: Yes	•
	RNELL: Yes

1

2	CHAIR BEACH: Okay. And then 13 is the
3	thorium bioassay database. That takes us back to
4	that Class YY confirmed

5 MR. FITZGERALD: Yeah, this is the last 6 item. And again, this is sort of a leftover issue 7 that was discussed, and again wasn't really high 8 priority, but it was discussed in the internal 9 dosimetrv discussions. And, again, was а 10 clarification on exactly where the issue was 11 addressed. I think during the last Work Group 12 meeting, Jim, you were mentioning that, yeah, that would be confirmed and cited somewhere along the 13 14 way.

Because of the timeframe involved, it's been a number of years since we actually addressed that. It did get picked up in I think you mentioned the Berkeley Review, and I don't think it's a technical issue so much as that a broad -- just to clarify where that's a broad guidance to dose reconstructors at all sites. I think the comment

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	here that's made, Pete, I believe it's clear that
2	that certainly ought to be something that every
3	site would be applying.
4	But I guess, just for the record, is
5	NIOSH applying the Class YY approach, as at
6	Berkeley, as at Mound, for all sites?
7	DR. NETON: Well, what we're saying
8	here is Type S bounds Class Y type thorium.
9	MR. FITZGERALD: And that would be a
10	standard approach, then.
11	DR. NETON: Right. And that sort of
12	came about that I think some people indicated
13	and this is my memory, not correct 100 percent
14	but Type Y, Class Y uranium has certain clearance
15	patterns and Type S- has a much longer clearance
16	time, and our opinion was that it bounds even a
17	higher insoluble Y. And we discussed that at
18	length. Clearly, this little excerpt from the
19	Lawrence Berkeley Review, SC&A agreed with us that
20	solubility S bounds insoluble thorium. So we
21	would just apply the standard Type S clearance on

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 clearance rate.

2	CHAIR BEACH: And that approach is
3	clear to the dose reconstructors?
4	DR. NETON: Yeah. I mean, that's a
5	standard procedure. You do all three solubility
6	classes and pick the one that gives you the highest
7	dose.
8	CHAIR BEACH: Okay. And I think that
9	was the main question, as long as the dose
10	reconstructors understood that.
11	DR. NETON: This sort of piggybacked on
12	that type super-insoluble uranium and then it sort
13	of morphed into, well, maybe if uranium exists,
14	then maybe Y does. And we never found any evidence
15	that uranium existed, let alone thorium.
16	MR. FITZGERALD: Yeah, it was one of
17	these discussion threads that went back and forth,
18	and then sort of we went on and Mound, the SEC got
19	settled. And so this is almost more of a loose
20	ends, just trying to make sure that we can put a
21	punctuation point on some of these discussions that

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	we had three or four or five years ago. It does
2	get hard to remember.
3	CHAIR BEACH: It does. Alright, that
4	takes us through our items. My gosh.
5	MR. DARNELL: So did we vote 13 closed?
6	CHAIR BEACH: No, we did not. So, 13,
7	Paul, any discussion on 13?
8	MEMBER ZIEMER: No, I'm in agreement.
9	CHAIR BEACH: You're in agreement.
10	Brad, Phil?
11	MEMBER SCHOFIELD: I'm in agreement.
12	CHAIR BEACH: Okay, that one is closed.
13	That just leaves us with the two and a memo. I
14	think we can handle that. Will we need another
15	call for that?
16	MR. KATZ: Well, you'll need a call to
17	close it.
18	CHAIR BEACH: Yeah.
19	MR. KATZ: That's okay, because that
20	call you can discuss present that the Board then,
21	right, because you will have wrapped up Mound. No,

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	wait, sorry
2	MR. DARNELL: External still needs to
3	be complete
4	MR. FITZGERALD: One TBD outstanding.
5	MR. KATZ: Okay, and what's the
6	timeframe for that?
7	MR. KATZ: Sometime next year.
8	CHAIR BEACH: That's what I was just
9	going to ask.
10	MR. KATZ: I would just package this
11	together. We don't need to have a call for this
12	one. It's really too small a matter even to it's
13	not worth the expense of the call.
14	MR. FITZGERALD: Maybe an email just
15	providing the information.
16	MR. KATZ: Yeah.
17	MR. FITZGERALD: Then hold it for
18	MR. KATZ: Hold it for how we deal with
19	the external.
20	MR. DARNELL: I'll send out a memo to
21	the group, like we've done before to the other

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1	sites. Just say, okay, here's what the answer is
2	and comments then can come in.
3	DR. NETON: How extensive are the
4	external issues? I guess I've forgotten. Is it
5	just the neutron issue?
6	MR. DARNELL: No, there's a few other
7	issues.
8	DR. NETON: Since it wasn't on here, I
9	didn't prepare for it. I do a just-in-time
10	approach.
11	CHAIR BEACH: And I knew it wasn't
12	going to be
13	MR. KATZ: Is that a springtime how
14	far out?
15	MR. DARNELL: I'm not going to give you
16	any idea, because I'm not sure. The problem is
17	that as you know, Tim Taulbee was given special
18	dispensation from on high to talk about his
19	knowledge while he's working SRS.
20	MR. KATZ: No, I know.
21	DR. NETON: But that was specifically

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

1 just to work on the neutron issue. It's a very 2 narrow --3 MR. KATZ: Right, but getting him to to the principal external 4 have time to talk 5 dosimetrist, which Smith, is Matt has been 6 difficult. 7 CHAIR BEACH: Maybe his boss can make that happen. Just kidding. 8 9 (Laughter.) 10 MR. DARNELL: It's all on the schedule. 11 It all needs to get done. 12 It's fine, it's fine. MR. KATZ: So, anyway, we'll package the closing of this up with 13 the closure of that. 14 15 MR. FITZGERALD: There's a generic neutron issue for a couple of sites. 16 17 DR. NETON: Yeah, the Brookhaven, interpretation of the NTA film issue. 18 19 CHAIR BEACH: So my understanding is we'll get your memo. We'll all review it. And at 20 that point, if there's any questions, we can 21

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1	discuss it via email. Hold on to that until the
2	last external comes out. Is that correct? Is
3	that what I'm hearing?
4	DR. NETON: Yeah, sounds good.
5	CHAIR BEACH: Alright, that makes sense.
6	MR. DARNELL: This was a lot more
7	productive. Very good.
8	CHAIR BEACH: Is there anything else?
9	I hate to say we can close, but
10	MR. KATZ: That's lickety split. I
11	think we're finished.
12	CHAIR BEACH: That's a lot faster than
13	I thought, too. So we are finished with internal,
14	waiting for the last memo on those two items, and
15	so we can go ahead and close.
16	Adjourn
17	MR. KATZ: Thank you, everyone on the
18	phone, for joining us, too. And we're adjourned.
19	Take care, everyone.
20	(Whereupon, the above-entitled matter
21	went off the record at 10:16 a.m.)

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433