

**Diana, Sherri A. (CDC/NIOSH/EID) (CTR)**

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**From:** Tami Thatcher  
**Sent:** Friday, January 22, 2016 1:19 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** NIOSH needs to provide transparency or start approving INL Special Exposure Cohorts

Dear NIOSH at 'nioshdocket@cdc.gov'

Certainly no one expects every aspect of information to be included in NIOSH Technical Profiles. But do citizens have the right to expect that these might be reasonable complete road maps to past operations at the Idaho National Laboratory?

These NIOSH Technical Profiles are nice little light hearted documents that do not adequately point even in the general direction of all of the operations conducted at the INL. And it tends to discuss the more modern practices, not bothering to describe past dirtier operations or when practices changed.

One of the problems of the serious lack of completeness is that I see NIOSH professionals believing the limited information presented in these extremely limited technical profiles without any comprehension of what the profile is lacking.

And NIOSH believes there is no need to disclose the source of the documentation that it bases its knowledge of the timing, quantity and constituents of contamination. For example, the many MTR fuel or fueled experiment melt events. Does NIOSH defend its practice of not disclosing the references that would be needed in order to verify their completeness? Is NIOSH aware of any gas filtering on the primary coolant system, retention basin or hot waste holding tank? How it can conclude the fuel melt events at MTR were insignificant needs to be available for open examination.

So NIOSH is presuming without question the adequacy of personnel monitoring at the Test Reactor Area. DOE is always innocent until proven guilty.

So far, NIOSH presentations about its Test Reactor Area (TRA) review disclose a lack of comprehension of the range of fueled experiment test materials, fuel separations, fuel cutting, fuel (other irradiated material) transfer and transport, and fuel and other irradiated material) flushing to the open air retention basin and ponds. Is NIOSH aware of the quantity and composition of chunks of cut fuel the TRA hot cells attempted to flush to the ponds but settled out in the drain piping instead? Is NIOSH aware of the highly contaminated areas found during CERCLA cleanup, including the MTR hot alpha cave, which despite what you might read, had everything to do with separation alpha-rich materials. Or the extensive Americium-241 contamination of the retention basin and perched water below it? It could be easy to miss because DOE has been bent on avoiding discussion of its dirtiest problems. Alpha monitoring at the Test Reactor Area was so stellar, that a glove box used for alpha work was reused by workers unsuspecting that it was highly contaminated with alpha. No one was found to expected the maximum body burden. The buses that were contaminated were all cleaned up. (See the 1963 DOE H&S report.)

It took only 15 years to figure out INL monitoring practices at the chem. plant were deficient. How many more years will it take for NIOSH to figure out the problem was not limited to the chem.. plant? When I see presentations that seem bent on covering up DOE's past inadequate practices, I have to wonder how many decades will this go on.

The response to my recent question includes the utmost confidence and reliance on personnel monitoring at the Test Reactor Area. So I must emphasize that NIOSH needs to stop assuming that the monitoring practices were adequate at the chem. plant, at the Test Reactor Area, at the Test Reactor Area, or at the burial ground. Part of your job entails actually understanding what processes were being conducted and when and where. That has surely not been demonstrated by NIOSH technical documents. To that end, NIOSH and its so-called technical profile need to either provide adequate transparency of what they actually know about these operations or call it quits and start approving Special Exposure Cohorts.

Sincerely,  
Tami Thatcher