

**Office of Compensation Analysis and Support**  
**Program Evaluation Plan**

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Revision No. 0

**Evaluation of Incomplete Internal Dosimetry Records from Idaho, Argonne – East and Argonne – West National Laboratories** Page 1 of 3

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**RECORD OF ISSUE/REVISIONS**

<b>ISSUE AUTHORIZATION DATE</b>	<b>EFFECTIVE DATE</b>	<b>REV. NO.</b>	<b>DESCRIPTION</b>
03/21/2007	03/21/2007	0	New document to evaluate Incomplete Internal Dosimetry Records from Idaho, Argonne – East and Argonne – West National Laboratories.

**1.0 Description**

In April/May 2006, while reviewing dose reconstructions (DR) for an Idaho National Laboratory (INL) case and an Argonne National Laboratory – East (ANL-E) case, a particular notation (“no recordable dose”) in the INL dosimetry response, as well as a similar notation (“no internal dose”) in the ANL-E dosimetry response, was questioned. Both the INL and ANL-E points of contact (POC) were contacted and asked if this notation meant that the energy employee (EE) was not monitored. The INL POC responded that this notation meant that this particular EE may have been monitored but no internal dose was assigned. The ANL-E POC provided information that the EE had internal dose records for most years of his employment. [Although Argonne National Laboratory – West (ANL-W) requests are sent thru the Chicago Operations Office, the dosimetry records are provided by INL.]

In May/June 2006, it was determined that INL/ANL-W/ANL-E did not consistently include internal dose data in all of their individual dosimetry responses and that additional requests were needed for submitted cases with a POC less than 50%. For a particular EE, INL/ANL-W/ANL-E either provided all or none of the EE’s internal dosimetry records. A good indicator that there may be internal dosimetry data is that the OCAS-INT-004 (check-box form) may have a hand-written note next to the internal dosimetry status section that says – “no internal dose” or “no recordable dose.”

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## 2.0 Issue Evaluation

In July/August 2006, all INL/ANL-W/ANL-E submitted cases with a POC less than 50% were reviewed to determine if additional requests were needed. At that time, there were 603 INL, 64 ANL-W and 56 ANL-E of these cases. Since the middle of 2006, several of the cases were submitted to DOL (either before or after the receipt of the additional response). As of 1/24/2007, there were 677 INL, 87 ANL-W and 69 ANL-E. Each case was reviewed to determine:

- how the internal dosimetry status section on the OCAS-INT-004 was completed (not marked; or marked as provided, not readily available, or does not exist),
- if a hand-written note was indicated on the form (no internal dose/exposure, no recordable dose, no monitoring required, not monitored, etc.), and
- if internal dose records (in-vivo or bioassay records) were provided within the response.

Based on the information resulting from this review, it was determined that additional requests were needed for INL/ANL-W/ANL-E cases that met one of the following criteria:

- the OCAS-INT-004 was marked as internal dosimetry records provided with or without a hand-written note stating “no internal or recordable dose,” and there were no internal dose records in the response,
- the OCAS-INT-004 was marked as internal dosimetry records not readily available with or without a hand-written note stating “no internal or recordable dose,” and there were no internal dose records in the response, or
- the OCAS-INT-004 had no markings or notations, and there were no internal dose records in the response.

For INL/ANL-W, some responses contained notes stating that the EE was not monitored or that the records show no record of the EE being monitored or receiving dose at INL/ANL-W. These notes may appear on either the OCAS-INT-004 or on a memo within the response. Additional requests were not generated for cases when this information was provided within the response.

For ANL-E, some responses contained additional notes on a memo within the response such as data was not available, minimal dose based on bioassays, no internal doses assessed, etc. Additional requests were generated when these notations occurred within the response. Also, some responses contained notes stating that the EE was not monitored, that no internal radiation exposure records were on file, or that no bioassay records were found. These notes may appear on either the OCAS-INT-004 or on a memo within the response. Additional requests were not generated for cases when this information was provided within the response.

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### **3.0 Plan for Resolution or Corrective Action**

Additional requests were sent in August/September 2006:

- on 8/18/2006, additional requests were sent for ANL-E/ANL-W cases,
- on 9/1/2006, additional requests were sent for INL cases, and
- on 9/8/2006, additional requests were sent for the remaining INL cases.

(For some cases, additional requests may have already been sent prior to these bulk requests based on specific requests from the ORAUT DR team.)

As of January 2007, all additional responses for INL/ANL-E cases have been received. Also, only a few additional responses for ANL-W cases have been received.

Previously completed cases with a probability of causation less than 50%, will be re-evaluated if additional dosimetry data was received. Cases that were originally active in August/September 2006 but were submitted to DOL prior to the receipt of the additional response are also included in this re-evaluation. Responses have not yet been received for additional requests made for several of the ANL-W cases.

The current list of claims potentially requiring a re-evaluation under this PEP are 61 INL, 20 ANL-W, 6 ANL-E, and 2 INL/ANL-W for a total of 89 unique claims. As noted, 19 claims involving ANL-W employment are pending an additional data response. A review will commence upon receipt of the appropriate ANL-W response, and those with no new information will not require re-evaluation.