# SUBCOMMITTEE ON PROCEDURES REVIEW

Report on Norton Company SEC-00173 Addendum and subsequent revision

#### Subcommittee members

- Wanda Munn, Chair
- Michael H. Gibson
- Richard A. Lemen
- Paul L. Ziemer
- Robert W. Presley Alternate

## Norton Company SEC history

83.14 #00148, period 1/1/45 – 12/31/57, operations Recommended to Secretary 8/28/09

83.13 #00173, period 1/1/58 – 10/31/09 post-ops
One class 1/1/58 to 10/10/62, D&D

Recommended to Secretary 3/28/11

period 10/11/62 - 10/31/09, residual.

Referred to Subcommittee on Procedure Review 2/24/11 by Board action.

#### Procedures Subcommittee Action

- On 3-22-11, Subcommittee directed technical contractor to provide focused review
- SC&A provided review July 7, 2011 with two findings
  - Both internal and eternal dose estimates based on single samples from May 13, 1958, which appears inadequate
  - Source term depletion factor of 1%/day from OTIB 0070 has not been resolved in Subcommittee

#### Procedures Subcommittee Action

- Parties met with Subcommittee in Cincinnati on July 14, 2001
- Extensive discussion of two outstanding findings resulted in resolution of both:
  - SC&A agreed circumstances relative to the air samples were adequate in this case to bound exposure following extensive cleanup
  - NIOSH agreed default depletion factor was not appropriate for this particular site, and committed to issuing a correction to the addendum using the value of 0.067%/day

#### **Current Status**

- NIOSH has issued an addendum to SEC 00173 that uses the agreed 0.067%/day depletion factor – August 4, 2011
- There are no remaining unresolved issues applicable to the SEC class proposed for the residual period.

### Subcommittee Recommendation

- Quorum was not present at July meeting, hence no formal recommendation vote was possible.
- The members in attendance agree with the resolutions attained, and support the NIOSH recommendation to not grant SEC status for this residual period, as bounding doses can be estimated with sufficient accuracy for any exposures during the time designated.

Questions?