Division of Compensation Analysis and

Support

Program Evaluation Report

Document Number: DCAS-PER-053

Effective Date: 3/4/2015

Revision No. 0

Allied Chemical Corporation

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Author: Signature on file Date: 3/4/2015 Supersedes: None

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Approval: Signature on file Date: 3/4/2015

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RECORD OF ISSUE/REVISIONS						
ISSUE AUTHORIZATION DATE	EFFECTIVE DATE	REV. NO.	DESCRIPTION			
3/4/2015	3/4/2015	0	New document to determine the effect of a revision to the Allied Chemical Corporation Plant TBD on previously completed claims.			

1.0 Description

Revision 2 of the Technical Basis Document (TBD) for the Allied Chemical Corporation Plant (ORAUT-TKBS-0044) was issued on 4/28/2014. This PER considers the effect of the changes that were made in revision 2 on dose reconstructions that were completed using previous versions of the TBD.

2.0 Issue Evaluation

The revision to the Allied Chemical TBD includes several changes that would cause an increase in calculated doses. Because the changes cover all operational time periods and job types, no claims were excluded from further evaluation based on job types or employment period. Thus, a detailed listing of changes is not necessary. Some of the changes that occurred in the revision include:

- new guidance to assign adjacent year's external dose if records are missing or incomplete;
- an increase in the mode of the unmonitored neutron dose estimate from 1959 to 1976:
- a revision to ORAUT-OTIB-070 factors that increased doses in the residual period starting in 1977; and,
- a Change to the isotopic ratios for non-uranium radionuclide intakes during the residual period.

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3.0 Plan for Resolution or Corrective Action

To develop of list of potentially affected claims, dose reconstruction reports were searched for the occurrence of the word "allied" anywhere in the text of the document. This searche resulted in a list of 205 claims.

58 claims were removed from this list because the previous dose reconstruction resulted in a probability of causation (POC) of 50% or greater.

Four claims were removed because the claim had been pulled from dose reconstruction or the latest dose reconstruction was completed using revision 2 of the TBD.

42 claims were removed because they did not have any employment at the site. These had been listed because the dose reconstruction report containing the word "allied," but the word was not associated with this site. For example, 16 of these had employment at the Allied Chemical and Dye site. All but one of these claims were removed from the list. The one claim referenced a source term depletion factor from revision 1 of this TBD that was revised in revision 2. Therefore, this claim remained on the list for evaluation.

Four additional claims were removed from further evaluation because they meet the qualification criteria for the Allied Chemical SEC. The dose reconstructions had been done prior to the designation of the SEC. These claims were reviewed to insure no dose reconstruction was necessary for medical benefits.

The review process left 98 claims to be evaluated further. During this process, three claims were returned to NIOSH by DOL for a new dose reconstruction. Those dose reconstructions were performed using the revision 2 of the TBD so no further evaluation was necessary under this PER.

Additionally, the dose for two more claims was not recalculated under this PER. One was found to qualify for an SEC at another facility so no dose reconstruction was necessary. The other had only a short employment period at Allied Chemical (2 weeks) but several years of employment at another EEOICPA facility. Claims from the other facility are being evaluated under a different PER so this claim will be evaluated under that PER.

Dose for the remaining 93 claims was recalculated using the current revisions of the TBD as well as any other applicable documents. The resulting POC for all 93 claims was below 45%.

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NIOSH will provide the Department of Labor with the list of all the claims evaluated under this PER. Since none of the claims would now exceed a POC of 50%, NIOSH will not request the return of any of these claims.