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MEMORANDUM FOR: Robert E. Alexander, Chief  
Occupational Health Standards Branch, SD

FROM: Michael A. Parsont  
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THRU: Jacob Kastner, Chief  
Environmental Standards Branch, SD

SUBJECT: COMMENT ON ORNL PROPOSED "INDEPENDENT NRC EXAMINATION  
OF MORTALITY EXPERIENCE OF ATOMIC ENERGY WORKERS"

The project, as proposed, seems reasonable. However, there are serious questions about whether or not ORNL can do what they propose to do.

A proper evaluation of dosimetry is one of the major questions with the proposal. As I understand it, DOE still has not resolved this question. It is questionable to me that ORNL can clarify this in the time scale proposed. This consideration is involved in most of § 17 paragraph 1, "Expected Results in FY 1978".

It appears that ORNL proposes to examine the Hanford data as used by Mancuso et al. for errors. I do not believe that ORNL knows just how Mancuso et al. treated errors in their analysis. Thus, it might be a case of comparing apples and oranges.

No explanation is presented of how ORNL will use the data on autopsies. It occurs to me that it will introduce another study group thus leading to a larger problem with small number statistics.

Expected results in FY 1979 are based on the performance of 1978 tasks in which I have doubts.

Knowing the problem which exists by competition between ORNL and ORAU with respect to the analysis of the Health and Mortality Study Data, I doubt whether ORNL would get the cooperation needed to do this study efficiently. The question arises of whether or not ORNL is able to do an independent evaluation of the data under these circumstances.

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TASK NO: 716-9

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