

COPY FOR YOUR
INFORMATION

HARVARD UNIVERSITY
Department of Physics
Cambridge, MA 02138

MAY 29 2001

tel: (617) 495-3387
fax: (617) 495-0416
tel: (617) 332-4823 (home)
email: wilson@physics.harvard.edu
<http://phys4.harvard.edu/~wilson/>
May 24th 2001

Larry J. Elliott, MSPH, CIH
Acting Director, Office of Compensation
Analysis and Support
National Institute of Occupational Safety and Health
Robert A Taft Laboratories
4676 Columbia Parkway
Cincinnati, OH
45226-1998

Dear Mr Elliott,

Thank you for your letter of April 11th, which was misaddressed and reached me only yesterday. I therefore cannot reply before April 30th as you request but am replying as fast as I can.

Firstly, I enclose an article written about the general issue that will be published in the June issue of *Nuclear News*.

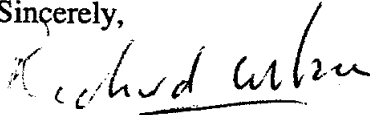
I have not thought about the three specific issues in any detail, and would normally spend a week or so thinking about them before commenting. But you have a deadline which has past, so I tell you my thoughts 'off the top of my head' and if there is time am willing to send later my thoughts from further down the head and indeed from as far as the heart. Please inform me if that would be useful.

- (1) I believe that you should use the Probability of Causation calculation as laid out in the Radioepidemiological Tables prepared by NCI in 1985, together with any update. These are already conservative in their using a linear dose response relationship at low doses, and no further conservatism, such as taking an upper bound of the probability distribution is justified.
- (2) I believe that you should use the best estimate (or perhaps the mean of the probability distribution) in estimating the cumulative past radiation dose.
- (3) I think that the procedure used to designate the class of workers in the "Special Exposure Cohort" that was used in preparation for the Energy Employees Occupational Illness Compensation Act of 2000 is distasteful (and probably illegal) in the extreme. I have

commented on that in the paper that I enclose. In my view the procedure must be open, which the previous one was not, must be responsive to queries especially from knowledgeable people, from people who were involved with previous decisions and to anyone who uses the freedom of information act. The setting of a Special Exposure Cohort is NOT a trivial matter. It sets precedents. This is addressing exposures that were endured 40 years ago. A few months delay to get it right seems in order.

I would be happy to consider the matter further if your schedule allows time.

Yours Sincerely,

A handwritten signature in cursive script that reads "Richard Wilson". The signature is written in dark ink and is positioned below the typed name.

Richard Wilson
Mallinckrodt Research Professor of Physics

1

1. Miller, Diane 10/04/2001 3:16 PM

Enclosure to be added when published.