

EPA Draft White Paper : RAC Advisory ( Working Draft, Nov. 15, 2006)

*References:* Revisions etc. (SAF)

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Ln 18 : re. *Gilbert 1991* ? - please identify location of citation in the text – I can't find it.

Ln 33 : *ICRU 1986*. ? : revise to: The Quality Factor in Radiation Protection. ICRU Report No. 40. International Commission on Radiation Units and Measurements. Bethesda, MD. 1986.

Ln 35 : *Japanese A-Bomb Survivors?* – delete ; reference (Delongchamp et al.,1997) is included in text (section 5.9, pg 16, ln. 12) and is given in full in the reference list (pg.21, ln.4, also correct sp. of Delongchamp here – no 's' ).

Ln 37 : *Kocher et al., 2005*.? revise to : Kocher DC, Apostoaei AI, Hoffman FO. Radiation effectiveness factors for use in calculating probability of causation of radiogenic cancers. Health Phys. 2005 Jul;89(1):3-32.

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Ln 4 : correct sp; '.....Ionizing.....'

Ln 11 : insert for '*Pierce, 2003*' (cited section 5.5, pg 12, ln. 25) : Pierce DA, Sharp GB, Mabuchi K. Joint effects of radiation and smoking on lung cancer risk among atomic bomb survivors. Radiat Res. 2003 Apr;159(4):511-20.

Ln 20 : *Shore 1990* ? – revise to : Shore RE. Overview of radiation-induced skin cancer in humans. Int J Radiat Biol. 1990 Apr;57(4):809-27.

Ln 22 : *Shore 2001* ? revise to : Shore RE. Radiation-induced skin cancer in humans. Med Pediatr Oncol. 2001 May;36(5):549-54.

Ln. 24 : correct sp. : 'Stewart, A. ....' Also correct in text at section 5.9, pg 16, ln 10

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Ln 17 : *Wakeford and Little. 2002* : revise/correct to : Wakeford R, Little MP. Risk coefficients for childhood cancer after intrauterine irradiation: a review. Int J Radiat Biol. 2003 May;79(5):293-309.

Comments include :

Pg 4, section 2.2.3: might want to consider taking the opportunity in this section to summarize the scope/objective of BEIR VII (i.e . to derive/update cancer risk estimates for doses of 100mSv or less primarily from external photon radiation based on the most current valid epidemiological and experimental data available, so that EPA's proposed modifications do not appear so much to be in response to shortcomings, careless omissions etc. on the part of BEIR VII rather than as necessary supplements to include cancer risk estimates beyond the scope of BEIR VII. E.g there were valid reasons for BEIR VII's omission of skin cancer estimates, and the use of incidence data rather than mortality data for thyroid cancer risk estimates, etc.

Pg 7, ln 36-38 : suggest rewording to “The ~~significance of the~~ data in these low dose ranges ~~is~~ **are** in many cases ***consistent with the absence of an effect, although they do not rule out an effect not different from zero***”

Pg 14, ln 43 -15, ln 4 : potentially confusing is the introduction here of the term REF without explanation – the implication being that RBE and REF are synonymous; if so, why use both ? – if not, explain.

Pg 14, ln 17 Z: insert refs for Mayak worker studies;

Gilbert ES, Koshurnikova NA, Sokolnikov ME, Shilnikova NS, Preston DL, Ron E, Okatenko PV, Khokhryakov VF, Vasilenko EK, Miller S, Eckerman K, Romanov SA. Lung cancer in Mayak workers. Radiat Res. 2004 Nov;162(5):505-16.

Koshurnikova NA, Gilbert ES, Sokolnikov M, Khokhryakov VF, Miller S, Preston DL, Romanov SA, Shilnikova NS, Suslova KG, Vostrotin VV. Bone cancers in Mayak workers. Radiat Res. 2000 Sep;154(3):237-45

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+ Other comments for discussion during the conference call.