

Radon Stakeholders Consensus Building Dialogue

Manchester, NH

April 4, 2008 8:00 – 4:00 pm

DRAFT Meeting Summary

Attendees

USEPA:

[Bill Long](#), Director, CRAT, USEPA

[Larainne Koehler](#), Radon & Indoor Air Coordinator for EPA

State Radon Programs:

[Chrystine Kelley](#), State Radon Contact, CO

[Josh Kerber](#), State Radon Staff, OH

[Jim McNees](#), State Radon Contact, AL; member, E-25 and CRCPD Board of Directors

[Francesca Provenzano](#), State Radon Contact, CT

[Mike Pyles](#), State Radon Contact, PA; member, E-25

[Bob Stilwell](#), State Radon Contact, ME: member E-25 and SR-R

National Environmental Health Association – National Radon Proficiency Program (NEHA-NRPP)

[Angel Price](#), Executive Director, NEHA-NRPP

Conference of Radiation Control Program Directors (CRCPD)

[Curt Hopkins](#), Radon Program Manager, CRCPD

AARST Consortium on National Radon Standards

[Gary Hodgden](#), Executive Stakeholder Committee Chairman, AARST Standards Consortium

American Association of Radon Scientists and Technologists (AARST):

[Bill Angell](#), Professor & Director, University of Minnesota—Midwest Universities Radon Consortium; President, AARST

[Peter Hendrick](#), Executive Director, AARST

[David Hill](#), AARST

[Philip Jenkins](#), Ph.D., CHP, Bowser Morner Laboratories

Introductions and Welcome: EPA and facilitator welcomed everyone. The facilitator reviewed the agenda.

Review of Last Meeting: Participants noted that the webilogue session was productive but also that 3 hours seemed too long for a conference call. There were also concerns raised that the functions of the technology were not sufficiently introduced to the group at the beginning of the meeting, including the “mood sharing” icons and the capacities for the leaders to monitor multi-tasking of participants.

Progress to Date: The facilitator reviewed some of the achievements of the group to date, and invited comments on successes and on-going needs and challenges.

Participants noted marked progress in the areas of building trust, comfort, increased understanding and shared knowledge among the groups, and noted many steps that had been taken to improve communications among group members. Participants also noted a number of on-going concerns, including:

- A need to ensure sustainability of the relationship improvements
 - beyond individuals to institutions
 - spreading to others within organizations
- On-going insufficient resources to achieve progress
- Pace of action on signed agreements too slow
 - frequency of communication is still limited
 - mechanisms to communicate agreements to radon community are still unclear
 - what does it mean to “sign agreements”?
- A need to formalize statements of leadership into a more substantive set of expectations
- A desire to move to the next level – not just solving problems, but moving together toward common future

The group agreed to continue to try to meet 2-3 times a year in person, plus 2-3 times a year by webilogue (of no more than 2 hours at a time)

Ground Rules: The group reviewed the existing group protocols to ensure that they were understood and agreed to by all.

A discussion was held on the question of NRSB participation in the group. The facilitator clarified that NRSB’s emailed comments had been included with the draft meeting summary pursuant to the group protocols allowing group members to include comments. However, because the NRSB had never indicated their interest in being a member of the dialogue group, it was unclear whether they should be treated as a member of the group. Furthermore, since they had never attended a meeting, they were unaware of and hard pressed to follow the group ground rules, especially those requiring group members to consider the views and concerns of other members in making statements and comments.

At the request of the group at the last meeting in Jacksonville, Bob Stillwell had talked with leaders of the NRSB and reported that they were not sure they were welcome by the group as a whole, despite being invited by individual members. He also asserted that the intention of the comments received were in the spirit of participation, and that deleting them from the meeting summary might not be a good answer.

After more discussion, the group agreed to send an official letter to the NRSB to welcome and actively invite them to join the dialogue group. The letter would request that the NRSB clarify its intention regarding participation, and that a lack of response would be considered notification of lack of interest. It would also clarify that while they would always be welcome to join the group, non-members would not receive draft documents or be given an opportunity to submit comments through the facilitator. ***Stacie agreed to draft this letter on behalf of the group.***

The group also clarified that all finalized documents – including meeting summaries, reports, and statements - could be shared with constituents, whereas draft documents should not be circulated. However, the contents of draft documents could be discussed with constituents for purposes of eliciting input and feedback that the representatives could then bring back to the group.

Progress and Next Steps on Dialogue Group Commitments

Accuracy and Q/A Q/C for Labs, Devices and Professionals

The group began by clarifying the next steps that would be needed to respond to the various concerns and needs identified in the report by the Working Group.

Phil Jenkins clarified that intercomparison between EPA & international labs could occur in one of two ways:

- 1) Participating in intercomparison events hosted by one lab, when all others send materials and everyone reports. To participate in such an event requires minimal time and cost, but hosting one requires extensive time and effort;
- 2) Sending around a traveling standard measurement device to labs, exposing it to set levels, & checking outcomes against the other lab outcomes

Regarding a need for national intercomparison, Phil explained the needs of the radon community from the EPA Las Vegas lab:

- Clarification about the possibility of a disruption in access to the lab
- Statement of a commitment to on-going national intercomparison
- Clarification of Lab policy on intercomparison process with other labs (public and private)

The group acknowledged the impossibility of securing firm commitments given the congressional budgeting process, and noted the need to come up with a possible Plan B.

Phil Jenkins agreed to draft a letter to Jed at EPA's Las Vegas lab, to clarify the group's requested commitments to participate in any hosted intercomparison events.

The group then discussed the system of Lab reference facilities in the US. The Working Group report was meant to inform stakeholders of how undefined, uncertain, and fragile the system is, due to:

- lack of consistent consensus standards
- impending retirements
- lack of profits available for labs. Without enforcement of QA & standards, there aren't incentives for manufacturers

A question was raised about the cost implications to consumers of enforcement of QA. Phil responded that he felt that the costs would be born by manufacturers, but it wasn't clear the extent of costs and whether/how they might be passed along to consumers.

The group listed the standards that needed to be developed regarding the accuracy & QA QC of labs, devices & professionals, which include:

- System/process for intercomparisons
- Guidelines for calibration
- Standards for chambers
- Device evaluations
 - user requirements
 - qualifications
 - technical conditions
 - equipment

In response to a question on whether to first develop standards for calibration or chambers, Phil offered his opinion that it was better to design the chamber to meet the standards on calibration.

The group discussed strategies for ensuring QA QC and managing liability for proficiency programs in the interim. One option mentioned was for leaders from NEHA-NRPP to develop their own policies on calibration of continuous monitors through the PAB to protect the proficiency program from liability concerns.

Some participants raised concerns that a policy initiated by the NEHA-NRPP PAB might expend a lot of effort from the same people who are needed to contribute to a national consensus standard-setting effort, and would lack the balance and input from other helpful voices – such as health physicists.

They offered a suggestion to adopt or adapt existing state policies, drawing from NY, NJ, maybe IL or others that have their own rules. *Laraine agreed to investigate and report.*

Regarding Device Evaluation, there are currently two policies from the two programs. Neither of these policies address the issue of the need to re-evaluate devices that have been on the list since before the privatization of the proficiency programs.

As an interim step, the group suggested that the AARST Consortium seek to pass interim, provisional device evaluation standards via ANSI.

Standards: Agreeing on Process: The group began by brainstorming criteria for determining an acceptable consensus process for the development of standards. These include:

- Open
- Transparent
 - Adequate notice of meetings
 - Reasonable access to meetings (cost, time, etc)
 - Complete minutes including voting results
 - Access to those minutes
 - Means to register comments/object

- Consideration of objections/views
- Meet requirements of nationally recognized consensus process (ANSI, AARST, ASTM) or specifically, those of ANSI Consensus Standards criteria
- Includes quality people (expertise)
- Balanced representation of public/private/affected parties
- Sufficient involvement – not too many or few
- Mechanisms for review by users for practicability
- Criteria for judging the outcomes as acceptable standards (i.e. practical, cost-effective, responsible)
- Accountable participation (within outside group)
- Mechanism for maintenance
- Oversight of process
- Workable / realistic

From this list, the group developed a few options for moving forward with standard-setting:

- Set ANSI criteria as a minimum. This would mean that the participating organizations agree to accept any process that meets ANSI requirements, including the AARST consortium and ASTM when it is also ANSI.
- Require criteria beyond those required by ANSI
- Articulate the above criteria as a set of values for a process

The group also discussed further the need for certifying the legitimacy for the overall radon community of the AARST Standards Consortium, so that the Consortium can go forward in their work with the knowledge that the outcomes will be acceptable to and serve the needs of the whole radon community.

Representatives need to seek input from their constituent groups to move toward a signed agreement on acceptable standard-setting practices. Each organization should explore these options, or potential additional options, and come to the next meeting prepared to make a formal agreement, if possible.

To assist, representatives are free to circulate the report and slides on Standards put together by Gary H and Steve Mawn. Gary will also circulate the consortium by-laws, which have been approved as meeting the criteria of ANSI.

There was also a request that stakeholder organizations commit to the allocation of resources for participation in consensus Standards processes. A participant suggested that EPA include this as an activity of the SIRG grants, though it was acknowledged that State travel freezes might still hinder State participation.

The group also acknowledged that education of their constituents would be needed to ensure their participation and understanding on these issues. Some suggestions include:

- The use of communication tools to expand constituent engagement in standard-setting processes earlier – for example, the new web portal?

- Creating an additional comment period for the CRCPD committee to give input prior to the final public review
- Webinar to educate States & industry on current work on standards in ONE voice, maybe live from the Symposium?
- Providing Status Reports on Standards in progress. ***Gary agreed to update & circulate this every month few months***

Reconciling E-2121 and AARST RMS: Given the resignation of Phil Anthes as chair of the ASTM E-2121 task group, within the E0641 working group, the dialogue group discussed whether it would be appropriate to weigh in on the selection of a new chair. ***The group created a Working Group of Gary, Mike, and Bill Long to explore or recruit potential candidates and give input on an candidates on the chair.***

AARST Consortium leaders made clear that E-2121 would need to conform to the requirements of ANSI in its revision process in order to be acceptable to the industry community. The group discussed whether it was possible for the E-2121 task group to require that the revision process meet ANSI criteria. Some possibilities included:

- Securing commitment from the task group to doing the extra work required for ANSI approval & offering ASTM the funds to pay the extra fee
- Moving E-2121 from ASTM to a partnership with the consortium

The group seemed to agree that it should push for the use of ANSI criteria in revising E-2121, in order to move forward in reconciling E-2121 and the AARST Consortium RMS, and thereby have one consensus mitigation standard acceptable to the whole radon community. ***This item needs to be formally approved by the group, and could then serve as a leverage point for pushing for the revision of E-2121 as a ANSI standard.***

Updates and Reports on Other Activities

The group took some time toward the end of the meeting to provide updates and reports on other proficiency and standards activities.

Phil Jenkins gave an update on the two Device Standards in progress, which were initiated by DOE contractors, with participation of other players such as DOD and Homeland Security. While not initiated by the AARST Standards Consortium, they quickly realized the need for the participation of Radon professionals and scientists. Their initial intent was to create one standards, but they decided the scope was too large and so split it into two.

Phil is on the Working Group for ANSI N 42.50, which is for performance standards for radon decay product measuring devices. This standard will go through the IEEE consensus standard process, which is approved by ANSI. Phil is also chairing the working group for ANSI N42.51, which is on performance standards for radon gas measuring devices, which is operating through the AARST Consortium. The personnel involved are primarily DOE contractors, DOD types, Homeland Security types and

AARST types (on both standards).

Phil then described his involvement with AMUG – Air monitors Users group – which is interested in radon primarily because it interferes with what they are really trying to measure, long-lived radionuclides in air, like plutonium, in occupational settings. He plans to attend the next AMUG meeting in Las Vegas next week, which also corresponds with a meeting of the working group on N42.50.

Phil also mentioned that he and Shawn Price are working on a very early draft of what could be a starting document on guidance for calibration and radon chamber requirements.

Angel informed the group about the new computer-based testing for the NRPP Exam. Test sites can be set up in State Radon Offices free. Practitioners would pay \$100 for exam. Visit LASSERFRADE.com to learn about the technical requirements and to see a list of current test locations (community colleges, airports, etc). Anyone interested should contact Angel. *It was suggested that Angel post this information to the radon community via the list serve. Angel agreed to do so.*

(Update: The computer based testing notice was posted on the Radonprofessionals site and then on the radonsirg site during the week of April 28).

A question was asked about communication between NEHA-NRPP and States regarding radon professions who have had their proficiency certification revoked. It was noted that some states needed official documentation in order to take action. Does NEHA have a protocol for official notification, or is it possible to work on such a protocol, such as submitting a list of names of professionals with revoked certification to CRCPD. *Angel agreed to talk with Heidi to explore if there are privacy issues or other barriers to such a proposal. AARST also agreed to clarify their procedure for publishing disciplinary action against AARST members.*

Outstanding Topics for Discussion: Several topics were raised for discussion during the meeting that the group did not have time to discuss. These include:

- Chamber Policy
- Increased enforcement of QA
- Implementation of QA policy
- Other organizations needing more contact – NRC
- Radon in water

Next Meeting: The group agreed to meet again contiguous to the National Radon Meeting in September, and to figure out the specific date.