

1 who live around the seven or eight different nuclear
2 arsenals as they are called that, were built during
3 the, right after World War II to make or handle nuclear
4 products and weapons. So we try to do the work,
5 estimate exposure of those in the community to either
6 radionuclides or chemicals.

7 Q Can a dose reconstruction be done with regard
8 to asbestos exposure?

9 A Usually.

10 Q Have you done so in the Mallia case?

11 A I didn't do one in the Mallia case.

12 Q Is there information that you are missing that
13 you would need in order to do so?

14 A Well, it depends on what level of precision you
15 wanted to estimate exposure. I feel like I could get
16 reasonably close if everything I had was known to be
17 accurate.

18 Q If you were to assume that Mr. Mallia's
19 testimony was accurate within the parameters of it, you
20 would be able to do so?

21 A I think I could get very close.

22 Q In that type of situation would you rely upon
23 the known information regarding Mr. Mallia or would you
24 do a Monte Carlo-type analysis?

25 A Depends how you wanted to see the information