

TO: D. Engle/M. Anderson

RE: Proposed response statement for UCC/NIOSH Number Differential

FROM: W.E.Hoerger -- December 4, 1981

I suggest the following statement be used:

The variances between total brain cancer deaths at Union Carbide Corporation's Texas City petrochemical plant reported by the company and the National Institute of Occupational Safety & Health (NIOSH) appear to be the result of differences among the groups studied.

Through 1977, Union Carbide observed 12 deaths due to brain cancer among 6,588 white male employees vs. an expected 7.42. NIOSH is not disagreeing with the numbers for this particular group, which they initially indicated would also be the employee population used in their study. Apparently, NIOSH later decided -- without notifying UCC -- to include black employees and figures through the year 1979. As a result, they are reporting 23 deaths due to brain cancer vs. an expected 10. The ratio of deaths reported in the two studies is not significantly different.

Union Carbide could find no relationship between deaths due to brain cancer and occupational exposure to chemicals used or produced at the Texas City plant since its start-up date in 1941. The company is not in a position to comment on any results attributed to NIOSH since we have not yet received a copy of either NIOSH's cohort or case control studies.

UCC 097130

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