



Department of Energy
Office of Science
Washington, DC 20585

October 31, 2011

Rear Admiral William S. Stokes
Director
National Toxicology Program
Interagency Center for the Evaluation of Alternative Toxicological Methods
National Institute of Environmental Health Sciences
P.O. Box 12233, Mail Code K2-16
Research Triangle Park, NC 27709

Dear Admiral Stokes:

This letter is in response to a June 30, 2011, request from Dr. Linda Birnbaum, Director, National Institute of Environmental Health Sciences.

Dr. Birnbaum requested the Department of Energy's review of toxicological test method recommendations for potency categorization of chemicals applicable to the murine local lymph node assay test method. These recommendations are contained in a document entitled: *Usefulness and Limitations of the Murine Local Lymph Node Assay for Potency Categorization of Chemicals Causing Allergic Contact Dermatitis in Humans* (NIH Publication No. 11-7709). This document presents a review of, and makes recommendations concerning the use of the local lymph node assay (LLNA) as a mechanism to categorize potentially strong skin sensitizers. While the document recommends that LLNA be used to categorize substances as strong sensitizers, it notes that the test should not be used as a stand-alone assay due to its underclassification of a significant fraction of known sensitizers. In addition, the document recommends the use of the recently updated LLNA test method protocol and identifies additional needs for test data to further evaluate this test.

These documents were reviewed by staff in the Department of Energy's Office of Science. Based on this review, the Department of Energy finds that the recommendations are consistent with the ICCVAM efforts to identify test protocols that "more accurately assess the safety and hazards of chemicals and products and that refine, reduce, or replace animal use." The Test Method Evaluation Report and the included Background Review Document have been developed in a thorough, open, and technically defensible manner. These reports and their underlying documentation have been reviewed vigorously and made available for general public comment. Both reviewer and public comments were considered and responded to carefully. The Department of Energy does not promulgate regulations or guidelines regarding the



assessment of allergic contact dermatitis in regulated products and thus does not have relevant test methods for which the ICCVAM test recommendations may be added or substituted.

Thank you for the opportunity to review these documents and please accept our appreciation for the time, effort, and expertise that were taken to develop these recommendations and their supporting background review documents.

Sincerely,


(signature redacted)


J. Michael Kuperberg, Ph.D.
Office of Biological and Environmental Research