



ORAU TEAM Dose Reconstruction Project for NIOSH

July 7, 2023

Tamela Sawyer
Conflict or Bias Officer

Mr. Grady Calhoun, CHP
Contracting Officer's Technical Representative
NIOSH Division of Compensation Analysis and Support (DCAS)
Robert A. Taft Building
4676 Columbia Parkway
MS: C-46
Cincinnati, OH 45230

Subject: Conflict or Bias Authorization Request for Mr. Mitch Findley to discuss internal dosimetry practices, methods, and operations related to the Savannah River Site

Dear Ms. Sawyer and Mr. Calhoun:

The Oak Ridge Associated Universities (ORAU) team requests approval to use information from Mr. William (Mitch) Findley to obtain a perspective as a site expert of the internal dose monitoring program at the Savannah River Site (SRS) from 1996 through 2012. Mr. Findley worked as a Health Physicist at the site beginning in 1990 and was the Internal Dosimetry Group Leader from 2003 through 2012. Mr. Findley has unique information about the SRS monitoring methodology and practices, and the ORAU team would like approval to utilize information from an interview with Mr. Findley in technical documents used to complete dose reconstructions.

Nature of Relationship

Mr. Mitch Findley is an employee of the MJW Corporation, which is one of the ORAU teaming partners. As such, he is a contractor employee working on the NIOSH Dose Reconstruction Project. Mr. Findley has an appearance of loss of impartiality concern stemming from his prior work at SRS and his resulting status as a potential claimant as well as a potential appearance of bias due to his previous work in internal dosimetry at the site.

Effect on Financial Interest

Mr. Findley's participation does not have any bearing on his financial interests. He is healthy and currently working for the ORAU team on other sites. Should Mr. Findley's current situation change (health or other), a reassessment will be conducted, and a new authorization will be submitted if his continued involvement is necessary.

Nature of Importance

Mr. Findley was the Internal Dosimetry Group Leader from 2003 through 2012. Mr. Findley has unique information about the monitoring methodology and practices at SRS during that time.

Sensitivity of the Matter

Questions have been raised by the Advisory Board on Radiation and Worker Health concerning the SRS internal dosimetry and monitoring practices that have only been addressed through a review of site procedures. Background and technical justification are needed to explain some of the monitoring practices outlined in the procedures.

Difficulty in Reassignment

As noted above, Mr. Findley's knowledge is unique regarding internal monitoring at SRS. Once the interviews are conducted, they will be documented by ORAU team staff that do not have a conflict or appearance of bias and will only be fact checked by Mr. Findley.

Adjustments to Employee's Duties to reduce Appearance of Bias

Upon review of the issue, appropriate measures will be implemented to ensure that any of Mr. Findley's perceived biases will not compromise this effort. These measures include:

- Mr. Findley will not be authoring any documents;
- Mr. Findley will not have final approval of the documents developed; and
- All information obtained from Mr. Findley will be reviewed closely by the ORAU team and Dr. Timothy Taulbee, a DCAS employee and Certified Health Physicist who is not conflicted at SRS.

Ms. Tamela Sawyer
and
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Because of the benefits to the ORAU team and DCAS provided by Mr. Findley's unique qualifications and the oversight measures included in this activity, his participation in interviews is requested.

Sincerely,

Kate Kimpan

Kate Kimpan
Project Manager
ORAU Team

Requested Action:

Grady Calhoun, Concurrence
DCAS Contracting Officer Representative

Date

Diane Meeder, Concurrence
Contracting Officer

Date

Tamela Sawyer, Approval
Acting Conflict or Bias Officer

Date