



**ORAUT TEAM
Dose Reconstruction
Project for NIOSH**

June 18, 2014

Mr. Frank J. Hearl, P.E.
Chief of Staff
National Institute for Occupational
Safety and Health
Centers for Disease Control
and Prevention (CDC)
395 East Street, SW
Washington, DC 20201

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

**SUBJ: Conflict or Bias Authorization Request for Mr. Bryce Rich to discuss
Internal Dosimetry practices, methods and operations related to the
Idaho National Laboratory (INL)**

Dear Mr. Hearl and Mr. Calhoun:

The Oak Ridge Associated Universities Team (ORAUT) requests approval to interview and utilize information from Mr. Bryce Rich to obtain a perspective of the radiological operations and personal monitoring program at INL from 1953 to 1963 and from 1973 through 1995. In addition, a member of the Advisory Board's Idaho National Laboratory Work Group (INL WG) has specifically asked that the Work Group interview Mr Rich. ORAUT anticipates that members of the INL WG, staff from the Board's technical support contractor, staff from DCAS, as well as ORAUT staff will participate in one or more interviews with Mr. Rich.

Mr. Rich was a Radiation Safety engineer and Manager of Radiation Safety Programs at the Idaho Chemical Processing Plant (ICPP) and the Test Reactor Area (TRA) from 1953 through 1963 when he left to direct safety Programs for Lawrence Livermore National Laboratory (LLNL). Mr. Rich returned to INL in 1973 and was the Radiation Safety Director at the ICPP through 1980. Mr. Rich was then promoted to Technical Director for Radiological Safety Support for the INL site. Mr. Rich has unique information about the early radiological operations when he was a Radiological Engineer (early name for Health Physicist) at the TRA and ICPP, and as the Radiation Safety Director for ICPP from 1973 through 1980. ORAUT would like approval to interview, document, and use the information obtained from Mr. Bryce Rich.

Nature of Relationship

Mr. Bryce Rich is an employee of Mel Chew & Associates which is a subcontractor to ORAUT. As such, he is a contractor employee working on the NIOSH Dose Reconstruction Project. Mr. Rich has an appearance of loss of impartiality concern stemming from his prior work at INL and his resulting current status as a potential claimant as well as a potential appearance of bias due to his previous work as a Radiological Engineer and Radiation Safety Director at the site.

Effect on Financial Interest

None – Due to extensive radiation safety experience (60+ years), Mr. Rich occasionally consults and advises ORAUT on other DOE sites, however due to his age, he does not work full-time on the ORAUT project. Therefore his participation does not have any bearing on his financial interests. Should Mr. Rich'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. Rich is one of the few living radiological engineers (if not the only) who worked at the site in 1953 and ORAUT feels it is important to capture as much information as possible for work conducted at the site during this very early time period before their perspectives are lost. In addition, Mr. Rich was the Radiation Safety Manager for ICPP which is one of the areas that the Advisory Board on Radiation and Worker Health (ABRWH) has identified as an area of concern and would like to know more about the operations. Mr. Rich has unique information about the monitoring methodology and practices at INL.

Sensitivity of the Matter

Questions have been raised by the ABRWH concerning the ICPP operations and monitoring practices that to date have only been addressed through a review of site procedures. Background and technical justification is needed to explain some of the monitoring practices outlined in the procedures. Mr. Rich is the only known person who can provide this information during the time period of interest.

Difficulty in Reassignment

As noted above, Mr. Rich's knowledge is unique with regard to early radiological operations, conditions, and personnel monitoring at INL. At this time there is no other known person who can provide this information. We believe DCAS is currently trying to identify other individuals through other means but to date have not identified anyone with Mr. Rich's expertise. Please note we are not requesting that Mr. Rich be assigned any specific work product other than being interviewed in order to obtain knowledge about the early INL operations and radiological conditions and monitoring at ICPP. Once the interviews are conducted, they will be documented by ORAUT staff that do not have a conflict or appearance of bias and will only be fact checked by Mr. Rich.

Mr. Frank J. Hearl, P.E.
and
Mr. Grady Calhoun, CHP
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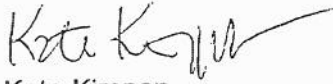
Adjustments to Employee's Duties to reduce Appearance of Bias

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

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

Because of the benefits to ORAUT, DCAS and the ABRWH, provided by Mr. Rich's unique qualifications and the oversight measures included in this activity, his participation in interviews is requested.

Sincerely,



Kate Kimpan
Project Manager
ORAU Team

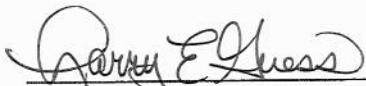
Requested Action:



Digitally signed by Grady J. Calhoun -S
DN: c=US, o=U.S. Government, ou=HHS, ou=CDC,
ou=People,
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cn=Grady J. Calhoun -S
Date: 2014.06.19 13:25:27 -0400'

Grady Calhoun, Concurrence
DCAS Contracting Officer Representative

Date



Larry Guess, Concurrence
Contracting Officer

6/19/14

Date

06/25/2014

Frank Hearl, Approved
Acting Conflict or Bias Officer

Date

NOTE by FJH: I approve the request w.r.t ORAUT interview, but also request that Mr. Rich must disclose his relationship to INL to the ABRWH subcommittee that wishes to interview him at the time of their interview.