



MEMO

TO: Rocky Flats Plant Work Group
FROM: Ron Buchanan, SC&A
DATE: September 4, 2013
SUBJECT: SC&A Review of RFP Data Falsification Issue

The following is a summary of SC&A's evaluation of the Rocky Flats Plant (RFP) data falsification issue:

- (1) The original worker interview was conducted in 1989 by the FBI.
- (2) An issue emerged from this interview that the accusations brought forth during the interview may indicate that there could potentially be problems with the recorded bioassay data used for dose reconstruction (DR) purposes for RFP workers.
- (3) NIOSH provided a white paper on June 10, 2013, in response to the potential data falsification issue; it finds no link between the interview issues and the recorded bioassay data that would impact DR.
- (4) A section of a co-petitioner's PowerPoint presentation at the July 2013 Advisory Board (AB) meeting questioned the validity of the recorded RFP bioassay data.
- (5) On July 18, 2013 (directly after the AB meeting), a former RFP worker (who had a broad knowledge of the RFP operations) was interviewed concerning the issues raised during the 1989 FBI investigation and the potential impact they could have on the accuracy of DR. The bioassay sample containers were treated with concentrated acid to stabilize the samples to prevent leaching into the sample containers, and to prevent any issues with bacteria.
- (6) A phone interview with another former RFP worker (who had a broad knowledge of the RFP operations) was conducted on August 20, 2013, concerning the 1989 FBI investigation. The worker did not see any obvious "crossover" impact to the bioassay program, because the bioassay program was separate from the environmental program; therefore, the FBI investigation did not result in any notable changes to the bioassay program. The bioassay sample containers were treated/raised with concentrated acid to prevent plate out of the material and prevent any issues with mold or bacteria.

Conclusions:

At this time, SC&A does not see obvious indications that the recorded data used for DR were impacted by the 1989 issues. *One item that needs to be clarified is whether the issues with the environmental samples discussed in the 1989 interview (primarily stack or area air monitoring) could have impacted the values in the Technical Basis Document, ORAUT-TKBS-0011-4, for environment intakes.* SC&A does not presently see that this has been considered, although this clearly would be a matter of "site profile" consequence.