

Dragon, Karen E. (CDC/NIOSH/EID)

From: NIOSH OCAS (CDC)
Sent: Thursday, November 19, 2015 9:12 AM
To: Dragon, Karen E. (CDC/NIOSH/EID)
Cc: Diana, Sherri A. (CDC/NIOSH/EID) (CTR)
Subject: FW: Advisory Board on Radiation and Worker Health
Attachments: 20151118 ADRWH Public Comment - Jon Lipsky.pdf

Another public comment for Rocky Flats.

From: Jon Lipsky
Sent: Wednesday, November 18, 2015 8:26 PM
To: NIOSH OCAS (CDC) <ocas@cdc.gov>
Cc: Rutherford, LaVon B. (CDC/NIOSH/DCAS) <lrr5@cdc.gov>;
Subject: Advisory Board on Radiation and Worker Health

Please include my attached public comment for the 11/18/2015 Advisory Board on Radiation and Worker Health.

Best regards,

Jon Lipsky

Comments regarding the NIOSH White Paper, Rev. 4, dated August 12, 2015
Entitled "Evaluation of Petitioner Concerns About Data Falsification and Data
Invalidation in RFP Building 123 Based on Worker Allegations and Issues
Relating to the FBI Raid" by Mutty Sharfi and Dan Stempfley, Oak Ridge Associated
Universities Team, Reviewed by LaVon Rutherford, DCAS

November 18, 2015 Comments to the Advisory Board on Radiation and Worker Health
By: Jon Lipsky, M.A.S.

Reference my July 11, 2015 public comments that were not addressed in the August
12, 2015 NIOSH White Paper, Revision 4, regarding Data Falsification.

From May 1987 to March 1992 I was the principal-lead FBI agent regarding the criminal
investigation at the Rocky Flats Nuclear Weapons plant, Golden, Colorado.

In March 1988 the U.S. Department of Energy, Environment, Safety, and Health, Office
of Nuclear Safety, Washington, D.C. 20545 published "Technical Safety Appraisal of Building
776/777 Rocky Flats Plant." In the interest of time please consider the following summary:"

1. "Of the 85 concerns in this report, 39 address problems that were found by one or both
of the earlier Technical Safety Appraisals of Rocky Flats Plant facilities." (DOE: 1988:
Appendix A, p. II-1). Nine (9) of the concerns were judged to be Category II
seriousness, five (5) of which were addressed while the appraisal team was present –
to develop realistic radiological operating rules, the effective enforcement of the rules
and calibration of radiological instrumentation used for contamination control. (DOE:
1988: Appendix A, p. II-2). The appraisal painted a serious personal radiological
problem at Rocky Flats.
2. "The pervasiveness of the deficiencies in the radiological program are (sic)
symptomatic of a program that has not had adequate management attention." For
example, radiation monitoring is adversely affected by poor quality instrumentation,
inadequate calibration techniques, and improper use of equipment. (DOE: 1988: p. 4).
3. "The radiological health quality assurance program is ineffective as evidenced by
some of the preceding concerns, failure to comply with DOE-prescribed standards,
and deficiencies in maintaining exposure records and tracking bioassay samples." The
appraisal team observed numerous violations of radiological procedures during the
appraisal. (DOE: 1988: pp. 4-5).

The referenced 280-page March 1988 Technical Safety Appraisal of Building 776/777
Rocky Flats Plant report refers to previous Technical Safety Appraisals of Rocky Flats. The
reported "problems" amounted to 46% of the 1988 findings appears to have been systemic,
multi-temporal and additional reasons to expand the Rocky Flats, Special Exposure Cohort
petition 0192.

Respectfully submitted,

Jon Lipsky, M.A.S.