

**United States Department of Energy
Office of Hearings and Appeals**

In the Matter of Sara Murray

Filing Date: February 26, 2025

Case No.: FIA-25-0017

Issued: April 4, 2025

Decision and Order

Sara Murray (Appellant) appeals a final determination letter (Determination Letter) issued to her from the Department of Energy (DOE), Hanford Field Office (the Hanford Site), concerning Request No. FOI 2025-01937, filed under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, as implemented by the DOE in 10 C.F.R. Part 1004. The Determination Letter informed the Appellant that after conducting a search, the Hanford Site identified medical records responsive to the FOIA request, but “no other records were located.” Determination Letter from the Hanford Site to Sara Murray at 1 (February 11, 2025). In this appeal, the Appellant challenges the adequacy of the Hanford Site’s search. Appeal Letter Email from Sara Murray to OHA at 1 (February 26, 2025). In this Decision, we deny the appeal.

I. Background

On January 14, 2025, the Appellant submitted a FOIA request to the DOE seeking the following records:

All information related to employment, medical/dispensary treatment, or presence on site at Hanford and any other nuclear facilities, and any other records in DOE possession, pertaining to William L. Scarlett. William L. Scarlett was a contractor with Guy F. Atkinson Co. His photo ID badge number shows an ID of #A25 and states ‘Contractor for U.S. Engineers.’

Determination Letter at 1.

Upon receiving the FOIA request, a FOIA Officer at the Hanford Site confirmed that the former DOE contractor-employee referenced in the request was employed at the Hanford Site and located his “Hanford Identification Number (HID) and social security number.” Email from Hanford FOIA Officer to OHA at 1–2 (March 18, 2025). The Hanford FOIA Officer then identified Inomedic Health Applications (IHA), Hanford Mission Integration Solutions (HMIS), and the DOE Visitor Control Center as potential custodians of responsive records related to the former contractor-employee. Email at 2.

IHA, the Hanford Site’s current contractor providing occupational medical services, conducted a search for the contractor-employee’s medical records using IDMS. Email at 1–2. IDMS is “the official electronic records repository for [the Hanford Site],” and it holds both “personnel

radiological records from 1992 forward” and “storage location information for physical medical records.” Email at 2. IHA also searched “an additional database [used to maintain paper records] created during [the] 1980’s to early 2000’s timeframe.” *Id.* IHA’s searches covered records created from 1943 to present. *Id.* As a result of its search, IHA located medical records for the former contractor-employee and forwarded those records to the Appellant. Determination Letter at 1.

Personnel at HMIS, the Hanford Site’s prime contractor and records manager, conducted searches of several repositories of personnel records at the Hanford Site. Email at 1–2. HMIS personnel searched the Hanford Site’s Records Holding Area, which “maintains an inventory of all inactive hardcopy/physical records stored at Hanford”; its Radiation Exposure Program Office, the site’s repository for “[a]ll personnel radiological records from 1992 [to present]” and physical records; and the Hanford Radiological Records Program, which “maintains all Hanford radiological records for Hanford workers dating back to 1942, in electronic, hard copy, microfiche, and microfilm formats.”¹ Email at 2.

Records of the DOE Visitor Control Center, the Hanford Site’s badging office, were also searched. Email at 2. OHA learned that the DOE Visitor Control Center “maintains records of everyone who has a badge and some legacy badging information,” and was determined to be a source of responsive records, “given the historical nature of the former employee’s employment.” Email from Hanford FOIA Officer to OHA at 2; Email from Hanford FOIA Officer to OHA, at 1 (March 19, 2025).

On February 11, 2025, the Hanford Site issued the Determination Letter to the Appellant. Determination Letter at 1. In the Determination letter, the Hanford Site notified the Appellant that IHA located medical records for Mr. Scarlett, but after a search was conducted of the above-mentioned locations using his name “William Leslie Scarlett, William L. Scarlett, W.F. Scarlett and WF Scarlett,” and social security number, “no other records were located.” *Id.*

On February 26, 2025, the Appellant filed the instant appeal with OHA challenging the adequacy of the Hanford Site’s search. Appeal at 1. In the appeal, the Appellant asserts that there were “documents missing” from the records the Hanford Site provided to her. *Id.* The Appellant also claims that she has submitted FOIA requests for other DOE contractor-employees in the past, and records she received from the Hanford Site did not include records she has seen from prior FOIA requests. Memorandum of Telephone Conversation between Sara Murray & OHA at 1 (March 4, 2025).

II. Analysis

A FOIA request requires an agency to “conduct a search reasonably calculated to uncover all relevant documents.” *Truitt v. Dep’t of State*, 897 F.2d 540, 542 (D.C. Cir. 1990). In conducting a search, an agency must search in locations where responsive records are likely to be found. *Powell v. IRS*, 280 F. Supp. 3d 155, 162–63 (D.D.C. 2017). An agency is not required to conduct an exhaustive search of each of its record systems, it need only conduct a reasonable search of systems that are likely to uncover responsive records. *Ryan v. FBI*, 113 F. Supp. 3d 356, 362 (D.D.C. 2015)

¹ The search of the Hanford Radiological Records Program included nine record systems, all of which maintain personnel records from years 1944 to 1982. Search Response from HMIS to Hanford FOIA Officer (January 27, 2025).

(citing *Oglesby v. U.S. Dep't of the Army*, 920 F.2d 57, 68 (D.C. Cir. 1990)). “The adequacy of a FOIA search is generally determined not by the fruits of the search, but by the appropriateness of the methods used to carry out the search.” *Jennings v. Dep't of Justice*, 230 F. App'x 1, 1 (D.C. Cir. 2007) (internal quotation marks omitted). We have not hesitated to remand a case where it is evident that the search conducted was in fact inadequate, and whether the search conducted was reasonable depends on the facts of each case. *See, e.g., Ayyakkannu Manivannan*, OHA Case No. FIA-17-0035 (2017)²; *Coffey v. Bureau of Land Mgmt.*, 249 F. Supp. 3d 488, 497 (D.D.C. 2017) (citing *Weisberg v. Dep't of Justice*, 745 F.2d 1476, 1485 (D.C. Cir. 1984)).

We find that, given the subject of the Appellant's FOIA request and the fact that the former employee was employed at the Hanford Site, the Hanford Site reasonably identified IHA, HMIS, and the DOE Visitor Control Center, as potential custodians of responsive records. Searches of the aforementioned record systems were conducted using identifying information for the former contractor-employee. Where a FOIA request seeks records related to a specific individual, it is reasonable for an agency to conduct its search using “logical variations” of the individual's name as a search term. *Wilson v. FBI*, No. 22-3062, 2025 U.S. Dist. LEXIS 28560, at *10 (D.C. Cir. 2025) (Agency's search deemed adequate where defendant used “logical variations of names that would have included plaintiff's requested terms.”). Personnel at the Hanford Site, IHA, HMIS, and the DOE Visitor Center used the name of the contractor-employee provided in the request, along with several variations of the name, in its search of the record systems described above: Williams Leslie Scarlett; William L. Scarlett; W.L. Scarlett; and WL Scarlett. Determination Letter at 1. The Hanford site also used the employee's social security number and HID, which are unique identifiers for the employee, as search terms. Determination Letter at 1; Email at 3. We find that the Hanford Site used search terms that were reasonably calculated to locate records responsive to the Appellant's FOIA request.

Finally, as to the Appellant's assertion that the Hanford Site's search was inadequate because there were records “missing” from the ones she received, the Appellant failed to identify the specific documents that were missing from the records she received or whether there were locations where the Hanford Site should have, but did not, search. Appeal at 1; Telephone Memorandum at 1. The Appellant's assertion that additional records exist because the ones provided to her did not include records that she received in response to previous FOIA requests, is speculative and does not mean that the Hanford Site's search was inadequate. *Wilbur v. CIA.*, 355 F.3d 675, 678 (D.C. Cir. 2004) (“[T]he agency's failure to turn up a particular document, or mere speculation that as yet uncovered documents might exist, does not undermine the determination that the agency conducted an adequate search for the requested records.”).

Based on the foregoing, we find that the search performed by the Hanford Site was reasonably calculated to uncover all documents responsive to the FOIA request and was therefore adequate.

III. Order

² Decisions issued by OHA are available on the OHA website located at <http://www.energy.gov/OHA>.

It is hereby ordered that the appeal filed by Sara Murray, on February 26, 2025, Case No. FIA-25-0017, is denied.

This is a final order of the Department of Energy from which any aggrieved party may seek judicial review pursuant to the provisions of 5 U.S.C. § 552(a)(4)(B). Judicial review may be sought in the district in which the requester resides or has a principal place of business, or in which the agency records are situated, or in the District of Columbia.

The 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect the right to pursue litigation. OGIS may be contacted in any of the following ways:

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