



OFFICE OF INSPECTOR GENERAL  
U.S. Department of Energy

# INSPECTION REPORT

DOE-OIG-20-23

January 2020

**MANAGEMENT OF DOSIMETRY  
SERVICES AT THE HANFORD SITE**



**Department of Energy**  
Washington, DC 20585

January 8, 2020

MEMORANDUM FOR THE MANAGER, OFFICE OF RIVER PROTECTION

A handwritten signature in black ink, appearing to read "Bruce Miller".

FROM: Bruce Miller  
Assistant Inspector General  
for Audits and Inspections  
Office of Inspector General

SUBJECT: INFORMATION: Inspection Report on "Management of Dosimetry Services at the Hanford Site"

BACKGROUND

Two Department of Energy organizations oversee environmental restoration at the radiologically contaminated Hanford Site located in the state of Washington. The first organization, the Department's Office of River Protection (River Protection) is responsible for cleanup of the Hanford Site tank waste. River Protection's mission is to retrieve and treat Hanford Site's tank waste and close the tank farms to protect the environmental integrity of the Columbia River. The second organization, the Richland Operations Office, is responsible for ensuring nuclear waste and facility cleanup, and overall management of the Hanford Site. The Richland Operations Office's mission is to restore the Columbia River corridor and transition the Hanford Central Plateau to a remediated state. The Richland Operations Office oversees several contractors, one of which is Mission Support Alliance who provides dosimetry services under the Hanford Site's Radiological Site Services (RSS). Dosimetry is the science of determining radiation dose by measurement and/or calculation. RSS provides external and internal dosimetry, radiological instrumentation, and records management services to all contractors working at the Hanford Site. The main dosimetry service users are Washington River Protection Solutions, overseen by River Protection, and CH2M Hill Plateau Remediation Company, overseen by the Richland Operations Office.

Our initial evaluation of the four RSS programs found that the External and Internal Dosimetry Programs were the subjects of extensive independent oversight and that, according to Mission Support Alliance management, the Radiological Instrumentation Program received a separate budget outside of our initial RSS work scope. Therefore, we focused the inspection on the Hanford Site's RSS because we determined that it had the greatest programmatic risk. We conducted this inspection to determine if the Hanford Site's RSS Records Program maintained complete and adequate radiological exposure records.

## RESULTS OF INSPECTION

While the Hanford Site's RSS Records Program is a longstanding, mature organization staffed by knowledgeable and dedicated individuals, we found opportunities to improve the Records Program. Specifically, we identified inconsistent dosimetry record practices that placed records at risk in the past and continue to pose a risk to the accuracy and completeness of the records. For example, one contractor, Washington River Protection Solutions, did not provide complete history forms for some of its Hanford Site employees as required by the Hanford Radiological Records Program Manual. According to contractor officials, approximately 111 employees did not have history forms entered into the Radiation Exposure Database as required by the Hanford Radiological Records Program Manual. In addition, although not required, contractors were not utilizing standard record forms available through Mission Support Alliance. The use of standard forms can reduce the amount of followup effort and help in the accuracy and completeness of the records.

The issues we identified occurred, in part, because the Department did not clearly identify oversight responsibility regarding the RSS, which is overseen by two separate organizations. Specifically, when an issue arose with a River Protection contractor, Washington River Protection Solutions, regarding the RSS, it was unclear whether River Protection or the Richland Operations Office was responsible for ensuring that the issue was resolved. Additionally, there were inconsistent requirements between the Federal regulations, program-specific policies and procedures, and site contracts. Finally, there was no requirement to utilize standardized documents.

We determined that actions are needed to ensure records are accurate and complete by defining the Federal oversight responsibility, establishing consistent requirements, and implementing standardized forms. Such actions will also help limit the risk of Federal Government liability through the *Energy Employee Occupational Illness Compensation Program Act*. This program compensates current and former Department employees for any occupational illnesses causally linked to toxic exposures in the Department work environment. Complete and accurate radiation exposure records are essential to ensure eligible workers or their survivors receive appropriate compensation and to ensure the Government's liability is accurately verified. Since enacted in October 2000, the Federal Government has paid several billion dollars in compensation and medical bills for prior Department employees under the *Energy Employee Occupational Illness Compensation Program Act*.

We made recommendations to ensure that continued management attention is given to these identified issues.

## MANAGEMENT RESPONSE

Management partially concurred with Recommendations 1 and 2 of the report and concurred with Recommendation 3. Management stated it will clarify the oversight responsibilities in Hanford Site documents for dosimetry services. However, management did not agree that there is a lack of clarity in oversight responsibilities between the offices nor a lack of defined processes to resolve disputes. Management further stated that it does not agree that the observed inconsistency poses a liability to the Department under the *Energy Employees Occupational*

*Illness Compensation Program Act.* Nevertheless, management agreed to review the contracts and procedure manuals for consistency, and to require contractors to utilize standardized dosimetry forms.

Although we disagree with some of the assertions made by management, we conclude that management's proposed actions are responsive to our recommendations.

#### Attachments

cc: Chief of Staff  
Senior Advisor for Environmental Management to the Under Secretary for Science

# MANAGEMENT OF DOSIMETRY SERVICES AT THE HANFORD SITE

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# MANAGEMENT OF DOSIMETRY SERVICES AT THE HANFORD SITE

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## BACKGROUND

The Hanford Site's Radiological Site Services (RSS) is composed of four interdependent component programs that provide external and internal dosimetry, radiological instrumentation, and records management services. We conducted a high-level review of all four programs under RSS and focused on the Hanford Radiological Records Program (Records Program) because we determined it had the greatest programmatic risk. Department of Energy oversight offices, the contractors themselves, and an independent third party routinely assess the Hanford External and Internal Dosimetry Programs. The RSS also has a Quality Assurance Program that provides regulatory quality assurance, quality control, and independent oversight for all RSS programs. The Records Program represents the nexus of the RSS, providing the documentation that the Department, workers, and stakeholders rely on to assess past and future risks. Given the critical nature of radiation exposure records, and that their accuracy and completeness is of utmost importance, we focused the inspection on radiation exposure records under the Records Program.

The mission of the Records Program is to administer and preserve the official occupational radiation exposure records for the Hanford Site in support of all Department operations and to issue official reports and exposure summaries. The Records Program is designed and operated to meet the applicable requirements of Title 10, Code of Federal Regulations, Part 835, *Occupational Radiation Protection*. The Records Program also supplies data for epidemiological research, dose reconstruction studies, and other studies requiring dose, historical, or radiation incident information.

On June 29, 2016, an independent assessor for Mission Support Alliance (MSA) complimented the Records Program staff for several very good records management practices in its assessment report of compliance with 10 CFR 835, *Occupational Radiation Protection, Subpart I, Reports to Individuals*. For example, the assessor found that the staff had developed records verification processes and check sheets to ensure each step of the process is complete, accurate, and quality controlled. However, we found opportunities to further improve the Records Program and reduce risks that could affect the Federal Government's liability under compensation programs.

## DETAILS OF FINDINGS

The RSS has been an integral component of radiation protection at the Hanford Site. However, we found opportunities to improve the Records Program. Since 1965, the Hanford Site maintained a centralized Site-wide radiological instrumentation, external and internal dosimetry, and a record system to support operational needs. The Records Program supports Department and Hanford Site contractor radiation protection programs by maintaining reporting and record-keeping operations.

We identified inconsistent radiation exposure record practices that placed records at risk in the past and continue to pose a risk to the accuracy and completeness of the records. Specifically, Washington River Protection Solutions (WRPS) did not provide complete history forms for all of its Hanford Site employees. Approximately 111 employees did not have history forms entered

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into the Radiation Exposure Database as required by the Hanford Radiological Records Program Manual (Records Program Manual). We also found that contractors were not utilizing standard record forms available through MSA.

## History Forms

Our inspection found that one contractor at the Hanford Site, WRPS, did not provide complete history forms for 111 of its employees as required. The mission of the Records Program is to administer and preserve the official radiation exposure records for the Hanford Site in support of all Department operations. The Records Program operation is based on the concept that each contractor dosimetry organization is the focal point for all communication with its workers about dose reports, concerns, and records. Therefore, the Records Program relies on the contractors' dosimetry operations to collect and provide radiological data from their workers. Due to the involvement of two operations offices and a lack of documented delineation of oversight responsibility of the operations offices for the Records Program, it is unclear who provides oversight to ensure that Hanford Site contractors are fully supporting the Records Program.

According to the Records Program Manual, at the time the person is hired, the contractor must complete the Personal Radiation Exposure history form for the new employee. History forms collect information on an individual's prior employment involving radiation and are used in determining the Federal Government's liability if employees were to contract certain medical conditions. MSA then uses the information from this form to create the individual's electronic record in the Radiation Exposure Database.

In September 2014, the Hanford Personnel Dosimetry Advisory Committee (Advisory Committee) discussed an issue of one Hanford Site contractor who stopped completing history forms for workers unless the workers were assigned a dosimeter. Historically, every Hanford Site employee required by contract to use RSS had a history form. The lack of a history form may impact the Federal Government because it identifies and records information on an employee's prior employment involving radiation. Additionally, the *Energy Employees Occupational Illness Compensation Program Act* (EEOICPA), which provides compensation to current or former Department employees and their survivors for any occupational illnesses causally linked to toxic exposures in the Department work environment, places a high value on the statement of recorded dose. Without a record, very conservative, claimant-favorable assumptions may be made. According to the Advisory Committee, in September 2014, the Department agreed to review the history form issue and the Advisory Committee stated that it would be added to the next month's agenda. However, we found that the issue was not added to the next month's agenda and also not discussed in future Advisory Committee meetings.

Until our inspection, the issue remained unresolved, and WRPS stopped completing and submitting history forms to MSA from August 2014 through July 2015. According to WRPS officials, this practice resulted in 111 workers who went without a record in the Radiation Exposure Database for up to 3.5 years. WRPS officials stated the 111 employees did not have

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history forms entered into the Radiation Exposure Database when they were hired. WRPS also stated that it eventually resolved the issue by identifying all workers hired from August 2014 through July 2015 and entering their history forms as required by the Records Program Manual.

### **Standard Record Forms**

Although not a formal requirement, our inspection also found that contractors did not utilize the standard forms provided by MSA to complete requests related to radiation exposure records. The individual employee's radiation exposure record provides the consolidated history of an employee's radiation exposure experience while employed at the Hanford Site. Data from paper documents, such as the Personal Radiation History, Employee and Dosimetry Changes, and Visitor Dosimeter Issue forms are manually entered into the Radiation Exposure Database by contractor dosimetry staff and are verified by the Records Program staff. The paper documents are forwarded to the Records Library for processing into the Integrated Document Management System.

MSA explained that it provided standard forms, but not all contractors utilize them, which leads to contractors entering information into the Radiation Exposure Database that contain too little or irrelevant information. For example, each contractor has its own investigation of dosimetry report form, rather than utilizing MSA's form. MSA further explained that since the contractors' forms do not contain all of the information required to be input into the database, staff have to speak with the individual contractor familiar with the entry in order to obtain all of the information required to be input into the database. Therefore, we concluded that using standard forms for database entry will help mitigate the risks to the accuracy and completeness of the records.

### **Contributing Factors**

Inconsistent dosimetry records practices have led to Hanford Site workers who lack the required work histories and allowed contractors to submit incomplete radiation exposure records to the Records Program staff. Risks to the future accuracy and completeness of the records remain due to these inconsistent dosimetry records practices. Specifically: (1) the Department did not provide a clear identification of oversight responsibility regarding the RSS; (2) there are inconsistent requirements between Federal regulations, Hanford Site contracts, Statements of Work, and related dosimetry manuals; and (3) there is no requirement to utilize available standardized documents.

### **Identification of Oversight**

The roles and responsibilities regarding oversight and the completion of history forms were not clearly defined. Both the Richland Operations Office and the Office of River Protection (River Protection) oversee separate Hanford Site contractors. Although MSA's contract is with the Richland Operations Office, MSA provides RSS to contractors under River Protection. Currently, there is no agreement that defines the relationships between the two Department organizations and MSA relating to RSS. For example, when there is a conflict between the contractors, such as what MSA considers to be necessary dosimetry practices and what another



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contractor might claim to be compliant dosimetry practices, there is no policy that dictates which Department organization is responsible for providing a solution to the disagreement. Additionally, when an issue arose with WRPS not providing history forms, it was unclear whether River Protection or the Richland Operations Office was responsible for ensuring that the issue was resolved.

There should be a clear identification of oversight responsibility, as both Department organizations are involved with the dosimetry program. Presently, a representative from each organization sits on the Advisory Committee. Additionally, both organizations participate in the review of MSA's Title 10, Code of Federal Regulations, Part 835, *Occupational Radiation Protection* (10 CFR 835) compliance, and both organizations are responsible for ensuring that contractors are meeting their obligations to MSA. Since both Department organizations have a presence within the RSS, it would be beneficial to have clearly documented roles and responsibilities to help ensure that important procedures such as collecting history forms are not ignored or overlooked.

### **Inconsistent Requirements**

The requirement to complete history forms for all Hanford Site employees is unclear because there are conflicting clauses in the applicable criteria. According to a Hanford Site official and Advisory Committee meeting notes, WRPS stopped completing history forms for all employees. We concluded that a likely factor in this decision was that 10 CFR 835 only requires history forms for radiation workers. However, 10 CFR 835 is only one of several sets of rules and regulations contractors are required to follow related to dosimetry. For example, the Records Program Manual imposes stricter requirements than 10 CFR 835 because it requires history forms to be completed for all employees, not just radiation workers.

It is unclear which policies take precedent under the terms of the Statements of Work between the contractors and MSA because the Statements of Work cite conflicting sources. For example, the Statements of Work require reasonable efforts to obtain an individual's prior radiation exposure records on the history form, as defined by Department Guide 441.1-1C, *Radiation Protection Programs Guide for Use with 10 CFR 835*. An attachment to the Statements of Work that discusses employment histories also uses the language from 10 CFR 835. However, the Statements of Work also require the contractor to meet the requirements of the Records Program Manual. The policies, as currently written, would require contractors to review several sets of criteria, identify conflicting requirements, and then make a determination as to which set of requirements takes precedent in order to remain compliant with contractual obligations. We have concluded that consistent and accurate policies will help minimize conflict and disagreement among contractors and help ensure that the Hanford Site is in compliance with Federal regulations.

### **Standardized Documentation**

There is no requirement for contractors to utilize standard forms for the services they receive from MSA. Under the Statements of Work, each contractor is required to forward all records to the Records Program in a timely and quality manner. However, the use of standard forms may

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help the accuracy and completeness of the records. MSA and WRPS employees explained that they would like to see more standardization regarding forms that are submitted to RSS because the Records Program staff and other dosimetry operations support staff are repeatedly correcting mistakes.

## **Impact**

One of the priorities of the Department is to ensure a safe and secure workplace by integrating safety and security into every element of the Department's mission to safeguard employees, contractors, and subcontractors. Radiation exposure monitoring must be precise and accurate to provide Department management and workers an assurance that occupation radiation exposures are accurately measured, analyzed, and reported. More specifically, the mission of the Records Program is to administer and preserve the official occupational radiation exposure records for the Hanford Site in support of all Department operations and to issue official reports and exposure summaries. These records provide key and sensitive information to management and workers, who make decisions based on this information.

The Records Program also provides radiation exposure history information for individual claimants to the National Institute for Occupational Safety and Health under the EEOICPA. The EEOICPA provides compensation to current or former Department employees and their survivors for any occupational illnesses causally linked to toxic exposures in the Department work environment. One of the reasons for enacting the EEOICPA was inadequate exposure data, which precluded workers from obtaining workers' compensation benefits. As stated in Executive Order 13179, *Providing Compensation to America's Nuclear Weapons Workers*, the Department should provide workers and their survivors with all pertinent and available information necessary for evaluating and processing claims. Complete and accurate radiation exposure records are essential for verifying compensation eligibility for workers or their survivors. As of December 9, 2018, the Federal Government had paid \$1,561,779,507 in compensation and medical bills for claims filed by Hanford Site workers.

Finally, complete and accurate radiation exposure records can also protect the Federal Government from paying for unsupported claims. If the National Institute for Occupational Safety and Health finds a lack of sufficient information regarding radiation exposure data, it will extend eligibility requirements to any claimant who has one of 22 specified cancers and can show that he or she worked at the Hanford Site for at least 250 workdays, regardless of whether the claimant was potentially exposed to radiation or not. Therefore, accurate and complete radiological exposure records can decrease the Federal Government's liability.

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## RECOMMENDATIONS

To address the concerns identified in this report, we recommend that the Manager, Office of River Protection, ensure that the Richland Operations Office and the Office of River Protection work together to take action to:

1. Clearly define and document the oversight responsibility regarding radiation protection practices, especially as they relate to radiation exposure monitoring and records; and
2. Ensure that radiation exposure records requirements are clear and consistent between contracts and procedure manuals.

We also suggest that the Manager, Office of River Protection:

3. Require Hanford Site contractors to utilize standard forms in order to prevent inconsistencies in the data entered into the Radiation Exposure Database.

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## MANAGEMENT RESPONSE

In responding to the report and its recommendations, management partially concurred with Recommendations 1 and 2, and concurred with Recommendation 3.

In response to Recommendation 1, management stated that the Richland Operations Office and River Protection will clarify the oversight responsibilities in Hanford Site documents for dosimetry services. However, management does not agree that there is a lack of clarity in oversight responsibilities between the offices nor a lack of defined processes to resolve disputes. The Richland Operations Office and River Protection will reinforce the expectations to utilize the existing processes in the Advisory Committee and the Forum to resolve conflict between contractors on dosimetry service issues.

In response to Recommendation 2, management stated that the Richland Operations Office and River Protection will review the contracts and procedure manuals for consistency. However, the Department does not agree that the observed inconsistency poses a liability to the Department under the EEOICPA.

In response to Recommendation 3, management stated that the Department will consider this suggestion and work with the local contractors to implement standardized dosimetry forms where appropriate.

## INSPECTOR COMMENTS

We determined that the proposed actions by management were responsive to the recommendations. However, we do not agree with all of the supporting management comments.

Management's response that the Richland Operations Office and River Protection will clarify the oversight responsibilities in Hanford Site documents for dosimetry services is responsive to Recommendation 1. However, we disagree with management's comment that there was not a lack of clarity in oversight responsibilities. At the time of fieldwork, there was no agreement that defined the relationships between the two Department organizations and MSA relating to radiological site services. While we encourage management to take actions deemed necessary to reinforce its expectations, the Advisory Committee does not have oversight responsibility, and therefore, defining Department office responsibilities is needed.

Management's proposed action is responsive to Recommendation 2 of the report. However, the Department does not agree that the observed inconsistency poses a liability to the Department under the EEOICPA. The report states that we found opportunities to reduce risks that could affect the Federal Government's liability under compensation programs. This is accurate since the restitution process under the EEOICPA is administered and paid through the Department of Labor but relies on the dose reconstruction performed by the National Institute for Occupational Safety and Health based on records supplied by the Department. As stated in the report, if the National Institute for Occupational Safety and Health finds a lack of information (supplied by the Department) regarding radiation exposure data, it can establish a special cohort that extends

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eligibility requirements to any claimant with the specified cancers and specified work time at the Hanford Site. This could increase the number of employees eligible for payments under the EEOICPA, resulting in an increase to the Federal Government's liability.

Management comments are responsive to Recommendation 3 of the report.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

### **Objective**

We conducted this inspection to determine if the Hanford Site's Radiological Site Services' Records Program maintained complete and adequate radiological exposure records.

### **Scope**

The inspection was performed from July 2017 through July 2019. Our review focused on dosimetry services and activities at the Hanford Site. We conducted fieldwork at the Department of Energy's Richland Operations Office and the Office of River Protection in Richland, Washington. We also conducted fieldwork at Mission Support Alliance, Washington River Protection Solutions, and CH2M Hill Plateau Remediation Company, all located in Richland, Washington. This inspection was conducted under the Office of Inspector General project number S17IS014.

### **Methodology**

To accomplish the objective, we:

- Reviewed applicable laws, regulations, policies and procedures, and tested compliance with key provisions;
- Reviewed prior reports by the Office of Inspector General, and external and internal audit/review groups;
- Reviewed Hanford Personnel Dosimetry Advisory Committee meeting minutes and other related documents; and
- Interviewed key officials from the Richland Operations Office, the Office of River Protection, Hanford Site contractor personnel, and other related Department personnel.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. Those standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions and observations based on our inspection objective. We believe that the evidence obtained provided a reasonable basis for our conclusions and observations based on our inspection objective. Accordingly, the inspection included tests of controls and compliance with laws and regulations to the extent necessary to satisfy the inspection objective. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our inspection. We relied on computer-processed data to satisfy our objective. We conducted a reliability assessment of

computer-processed data relevant to our inspection objective by comparing a limited sample of data to corroborating evidence, including source data. We deemed the data sufficiently reliable for our purposes.

An exit conference was held with management officials on December 3, 2019.

## **RELATED REPORT**

### **Office of Environment, Health, Safety and Security**

Report on *DOE 2015 Occupational Radiation Exposure* (October 2016). This report provides an evaluation of Department of Energy-wide performance regarding compliance with Title 10, Code of Federal Regulations, Part 835, *Occupational Radiation Protection*, dose limits and As Low As Reasonably Achievable process requirements. In addition, the report provides data to Department organizations responsible for developing policies for protection of individuals from the adverse health effects of radiation. The report found that over a 5-year period, all monitored individuals received well below the Department regulatory limit of Total Effective Dose annually. The occupational radiation exposure records show that in 2015, Department facilities continued to comply with Department dose limits and Administrative Control Levels, and worked to minimize exposure to individuals.



MANAGEMENT COMMENTS



Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

SEP 25 2019

19-AMB-0011

MEMORANDUM FOR MICHELLE ANDERSON  
DEPUTY INSPECTOR GENERAL  
FOR AUDITS AND INSPECTIONS, IG-30-, HQ

FROM: BRIAN T. VANCE  
MANAGER

A handwritten signature in black ink, appearing to read "B.T. Vance".

SUBJECT: MANAGEMENT RESPONSE TO THE OFFICE OF INSPECTOR  
GENERAL DRAFT INSPECTION REPORT ON "MANAGEMENT  
OF DOSIMETRY SERVICES AT THE HANFORD SITE"

DOE Office of Environmental Management appreciates the opportunity to review and comment on the subject Office of Inspector General (OIG) draft report. We reviewed the information in the draft report with respect to the facts presented, conclusions reached, and appropriateness of the recommendations. A discussion of the report's recommendations follows.

**Recommendation 1:**

Clearly define and document the oversight responsibility regarding radiation protection practices, especially as they relate to radiation exposure monitoring and records.

**Management Response:** DOE partially concurs.

Richland Operations Office and the Office of River Protection will clarify the oversight responsibilities in Hanford Site documents for dosimetry services.

DOE does not agree that there is lack of clarity in oversight responsibilities between the offices nor a lack of defined processes to resolve disputes. Richland Operations Office and the Office of River Protection will reinforce the expectations to utilize the existing processes in the Hanford Personnel Dosimetry Advisory Committee and the Forum to resolve conflict between contractors on dosimetry service issues.

**Recommendation 2:**

Ensure that radiation exposure records requirements are clear and consistent between contracts and procedure manuals.

Michelle Anderson  
19-AMB-0011

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SEP 25 2019

**Management Response:** DOE partially concurs.

Richland Operations Office and the Office of River Protection will review the contracts and procedure manuals for consistency.

DOE does not agree that the observed inconsistency poses a liability to DOE under the *Energy Employees Occupational Illness Compensation Program Act* (EEOICPA).

**Recommendation 3:**

Office of Inspector General suggests that the Manager require Hanford Site contractors to utilize standard forms in order to prevent inconsistencies in the data entered into the Radiation Exposure Database.

**Management Response:** DOE concurs

DOE will consider this suggestion and work with the local contractors to implement standardized dosimetry forms where appropriate.

cc: Phil Sokolowski, IG-301.1  
Celinda Crawford, EM-3  
Leslie Jackson, EM-5.112  
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## **FEEDBACK**

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Office of Inspector General (IG-12)  
Department of Energy  
Washington, DC 20585

If you want to discuss this report or your comments with a member of the Office of Inspector General staff, please contact our office at (202) 586-1818. For media-related inquiries, please call (202) 586-7406.