

MEMORANDUM

Date: November 17, 1998  
To: File I98090031  
From: [REDACTED] Audit Advisor  
Through: [REDACTED] in Charge, Investigations Section  
Re: Case Closeout [REDACTED]

Background

On 30 September 1998, received a telephone call from [REDACTED] formerly employed by [REDACTED] as a Marine Science Technician. [REDACTED] accused [REDACTED] of engaging in a pattern of wrongdoing involving radioactive materials and waste: (1) radioactive waste stored closely to food items; (2) improper documentation of activity levels and disposals; and (3) firing employees who blow the whistle on these activities. [REDACTED] will still be involved in the program as a grad student, and wishes to remain anonymous. Archer stated that he did not voluntarily end his employment with [REDACTED] but said [REDACTED] told him his work was "inadequate."

Investigation

While in Christchurch, I interviewed separately (on 12 October 1998) two of the [REDACTED] employees named by [REDACTED] in his 30 September 1998 telephone allegation: [REDACTED] Manager of Hazardous and Solid Waste, and [REDACTED] Manager, Laboratory Science.

Radioactive waste stored closely to food items.

[REDACTED] stated that [REDACTED] follows International Maritime Dangerous Goods and DoT regulations for transporting and storing radioactive waste on-board ships. Before any waste is loaded on the ship it is noted on the stow plan. The stow plans are reviewed by [REDACTED] SEH (Safety and Environmental Health), [REDACTED] waste subcontractor (Philips

Environmental), and the captain of the vessel (the captain can impose stricter guidelines than are required by IMDJ or DoT). [REDACTED] admitted that mistakes can occur.

[REDACTED] stated that [REDACTED] reported that waste had been stored closely to food items in a sitrep. She investigated the incident, and determined that the isotope involved did not have to be stored separately and away from food. [REDACTED] sitrep was distributed, as was [REDACTED] report.

#### Improper documentation of activity levels and disposals.

[REDACTED] described the process for accepting and documenting radioactive waste. [REDACTED] description was confirmed by [REDACTED]. When [REDACTED] receives waste from a grantee, they verify that the amount used and the amount of waste noted on the logs equal the total material – they do not monitor the amount of radioactive material used, and they do not verify the amount of waste. If the two amounts do not equal the total (many times the amounts do not equal the total because of mathematical or transposition errors), a discrepancy report is generated, the waste is not accepted by [REDACTED] and it is returned to the grantee. At this point, the grantee would probably change the amounts and resubmit to [REDACTED]. [REDACTED] also confirmed that it is well-known that figures are routinely changed. Normally, [REDACTED] is not supposed to make changes. For a period of time, however, there was a backlog of ~1 year's waste being held that had to be cleared. Because the grantees were no longer there, [REDACTED] personnel made the changes that were required to reconcile the logs.

An automated, electronic system is now in place – RadTrack – which will alleviate many errors.

#### Firing employees who blow the whistle on these activities.

I asked [REDACTED] whether, in general, there had been any firings over improper waste handling or documentation, and she volunteered that a guy, [REDACTED] might have been fired around the time the food/waste was stored together, but that he was not fired for that reason. She said there had been performance problems with him (he didn't take direction, was "high maintenance," and always made a mountain out of a mole hill).

I asked [REDACTED] specifically about the woman [REDACTED] claims was fired. [REDACTED] knew of the incident, and told me the woman's name was [REDACTED].

I contacted [REDACTED] Manager of Human Resources. She told me that [REDACTED] has been a contract employee at [REDACTED] for most of the past 3-1/2 years (6/95-12/95; 2/96-2/97; 11-97-11/98). She was recently offered another year's contract but she turned it down. [REDACTED] reviewed [REDACTED] personnel file and said there is nothing to indicate that she had ever been disciplined or terminated for reporting incidents involving radioactive materials to NSF. She remembered discussing the incident with [REDACTED] and said that [REDACTED] told her she did not feel that she had the proper training so would

not go into the rad van. [REDACTED] also said that she remembers that [REDACTED] sent a memo directly to NSF, and that [REDACTED] was told that there was a procedure to follow.

Subsequently, [REDACTED] explained that the spill response procedures are being revised/rewritten, but that ship personnel have been provided with guidance for spill report format and distribution. [REDACTED] memo to NSF re: the incident did not follow the required format and distribution.

### Findings

I questioned [REDACTED] (OPP Safety and Health Officer) on the allegation and follow-up via e-mail. He essentially confirmed all I had been told by [REDACTED] and [REDACTED]. Based on his response, consider the allegation closed. There are procedures in place for transporting, storing and using radioactive materials and waste, and for alerting the appropriate personnel (NSF/OPP and [REDACTED] when there are problems. There is no indication that employees have suffered adverse consequences for alerting the appropriate personnel to potential or actual problems. NSF/OPP is aware of the procedures and conducts spot checks on them; when problems are identified [REDACTED] notified.

This allegation is closed.