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Subject: SSFL Area IV -- Removal of Propulsion Workers & Processes from SEM
Date: Monday, May 27, 2019 1:17:40 PM
Attachments: [DARs_12003747.pdf](#)
[DARS_REDACTED_PROPULSION.pdf](#)

Hello, John and Gary ~ I hope that this e-mail finds you well.

I'm writing about the removal of propulsion-related Job Titles / Labor Categories / Work Processes from the Site Exposure Matrices (SEM) database for Area IV of the Santa Susana Field Laboratory (SSFL). I do not believe that sufficient rationale for removing the information has been provided, and that it carries broad implications for SSFL workers under both Part B and Part E of EEOICPA.

Below, the following is addressed:

- SSFL propulsion workers participated in a variety of Department of Energy (DOE) Area IV / Energy Technology Engineering Center (ETEC) programs. They meet the established eligibility criteria, and should be represented in the SEM. Supportive documentation and three examples are provided below.
- Removal of propulsion references from SEM appears to have coincided with the 2016 expansion of the Area IV Special Exposure Cohort (SEC), which was based on an inability to reconstruct dose to the isotope Americium. This directly impacts propulsion workers who should easily qualify for the SEC.
- In response to the SEC expansion, Boeing has also stopped providing personnel and medical records to DOE in the Document Acquisitions Request (DAR). This prevents SSFL workers from using their personal records to establish diagnoses, work locations, processes, exposures, and eligibility. It also prevents DEEOIC from identifying complete covered employment, and from cross-checking Boeing's assertions against actual employment data to ensure accuracy. With the removal of propulsion references from SEM, the perception of worker eligibility to EEOICPA has been dramatically diminished.

Details and Attachments:

I continue encountering workers who have verified Area IV DOE employment, whose propulsion-related Job Titles are no longer in SEM. I have attached three (3) Boeing EE-5 Employment Verification Responses from claims filed years ago, which illustrate the problem. Case Identification Numbers are included on each of the EE-5's provided.

These Boeing EE-5 Responses confirm that a Propulsion Mechanic and Propulsion Test Inspector were assigned to Area IV Building 4066 (SNAP) for extended time periods; and that as late as 2001-2003 (although Boeing could not identify a "Time Clock Location") a Propulsion Systems Technician's DAR Records established Area IV employment and work processes, which were accepted by Seattle District Office.

The attached EE-5 Responses were supplied by Boeing years ago, when Boeing also provided detailed and comprehensive employment records in the DAR. DEEOIC has always accepted

that EE-5 Responses are sufficient to establish covered employment, and Seattle District Office has consistently used them to establish EEOICPA eligibility based on the depiction of Area IV “Time Clock Locations.” Although we now understand that the EE-5 routinely provided an incomplete depiction of covered employment, references to Area IV are considered to be verified indications of worker eligibility to EEOICPA. Therefore, it seems reasonable for one to expect that the corresponding Job Titles / Job Classifications would be present in SEM.

For example, based on the attached EE-5’s for these three employees, one should expect to see Propulsion Mechanic / Propulsion Test Inspector in SEM’s description of Building 4066. Additionally, one should expect all three Job Titles (Propulsion Mechanic, Propulsion Test Inspector, and Propulsion Systems Technician) in the SEM overview of Job Titles that are associated with Area IV.

When CORE Advocacy inquired about the removal of propulsion references from SEM, Paragon responded that, “It has been determined that propulsion system work was not part of Boeing’s DOE contract work in Area IV.” No further rationale or reference to supportive documentation to justify the change to SEM was provided.

The explanation appears to have come directly from Boeing. Taken at face value, it seems credible. However, once we consider that Boeing did not take over SSFL operations until 1996, and that DOE’s contracted propulsion work was performed by Boeing predecessors, North American Aviation / Rockwell International, we realize that the statement is selective and misleading, at best. Why was it considered sufficient to justify removal of all references to propulsion workers from SEM, given the exhaustive research that was initially required to support their inclusion?

Upon examination of the Boeing EE-5 Response for the Propulsion Systems Tech employed at Area IV (2001-2003), we realize that Job Titles may not have changed when Boeing took over site operations. For some, Job Titles remained the same into the early 2000’s, even when work processes became diverse and associated with Site Remediation. In this particular case, DAR Records established that this employee performed propulsion-related work at the Area IV Sodium Components Test Installation (SCTI) in addition to Site Remediation of the Area IV Sodium Reactor Experiment (SRE). His job duties included welding, debris removal, demolition and decommissioning, etc. Where is the logical basis for determining that this Propulsion Systems Technician was not associated with DOE activities at the worksite? His employment as a Propulsion Systems Technician was verified and accepted; his participation in DOE-propulsion work at SCTI and Site Remediation is detailed in his DAR Records, and evidenced by the progression of this claim.

DOE Propulsion-Related Work - Area IV

Some of the SSFL DOE programs that used principles of propulsion technology and propulsion workers include Systems for Nuclear Auxiliary Power (SNAP), Sodium Pump Testing, Liquid Metals Research, Molten Salt Research, Steam Generation, and Coal Gasification. All of these programs were DOE-Area IV / ETEC programs, recognized as having been sponsored by DOE at SSFL and other worksites that are covered by EEOICPA. These programs routinely involved DOE-contractor employees who had the word “propulsion” included in their Job Titles. In some cases, DOE contracts specified a need for propulsion workers.

It is logical for DOE-contractor employees who participated in these programs at Area IV / ETEC to be adequately represented in SEM, particularly when their Job Titles are apparent on the very documentation that is used to establish their covered employment.

The Impact of Removing Propulsion References from SEM

We continue to address ongoing efforts by Boeing and DOE to limit and control EEOICPA eligibility for SSFL workers; these efforts have been repeatedly acknowledged since the inception of EEOICPA eligibility policy at SSFL. The removal of propulsion references from SEM seems to be in response to the decision to add 24-years to the SEC, based on the inability to reconstruct dose to the radioactive isotope, Americium — combined with Boeing and DOE’s decision to stop providing actual employment / medical records in the DAR.

SNAP program literature suggests that SNAP propulsion workers may have been at greater risk of Americium exposure. Yet, as illustrated by Boeing’s letters that accompanied the EE-5 Responses for the Propulsion Mechanic and Propulsion Test Inspector at Building 4066 (present in their Case Files), these workers were not considered to be “radiation workers,” and were apparently never monitored for radiation exposure.

Building 4066 was an established radiological location. Incidents involving uranium oxide and worker contamination (followed by decontamination measures undertaken at the Hot Lab) are well documented; they’re noted in the SEM. Facility records show that Health Physicists (HPs) were required at Building 4066 during standard operations. It follows that any employee who was assigned to Building 4066, particularly for extended time periods, would be presumed to need radiation monitoring.

By removing propulsion workers from SEM, and by implying that they were never related to DOE activities at SSFL, Boeing has downplayed DOE operations at the worksite and minimized the inadequacy of worker monitoring practices. Moreover, by making it appear as though these workers are unrelated to DOE operations, the perception of worker eligibility is dramatically diminished — and withholding employment records aids in this effort. DEEOIC has been prevented from cross-checking actual employment data against Boeing’s EE-5 Responses, which routinely obscure years or decades of covered employment, by mischaracterizing it as “non-Area IV” work. This is a continuation of that effort.

Qualifying Information for Inclusion to SEM

Adding information to SEM requires exhaustive research. It follows that removal of information would require the discovery of substantive conflicts in the previously-vetted documentation, and a clear rationale for making a change. CORE Advocacy has requested an explanation for the removal of propulsion references from SEM, and to date we have not received sufficient rationale to support such a change.

While we understand that information is not necessarily required to be in SEM to prove an EEOICPA claim, the absence of information is routinely cited to support Recommended Decisions to deny compensation. In cases that involve SSFL workers, most are already at a disadvantage with under-reported covered employment in the EE-5 Response, combined with the absence of DAR Records.

The implication that propulsion workers were unrelated to DOE activities at SSFL conflicts

with documented site history, worker records, technical reports and literature issued by DOE and its contractors, and DOE contracts. We respectfully ask, where is the clear rationale behind removal of this information from SEM?

In Conclusion

Propulsion workers and references must be restored to the SEM. I am confident that we agree, workers who participated in DOE programs are deserving of a fair evaluation under EEOICPA that is based on an accurate depiction of a worksite and worker history. These employees deserve to have a functional and accurate SEM, as well as access to their personal employment records (which have been proven to be abundant for SSFL, as we have repeatedly established the extensive nature of Boeing's employment databases).

Additionally, a contractor should have no influence on the construction or content of SEM. Rather, all information should be backed by historic, credible documentation, without exception. The decision to remove information from SEM should be reviewed and vetted; such significant changes should be held to the same standard as adding information to SEM (or even greater, given conflicting information that would need adequate resolution to justify such a change). Removal of information from SEM should not be taken lightly.

We appreciate your availability and willingness to address these concerns. SSFL presents distinct and complex challenges to all of us. I am attending the June workshops in Las Vegas and, if you think a meeting would be productive, I welcome the opportunity for further discussion. As always, it's a privilege to contribute to SEM and to represent SSFL workers under the Act. I look forward to your response.

Sincerely,

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