

Annotated Bibliography of SC&A Reports

Pinellas Plant • SEC-00256 • Rebuttal and Evidentiary Use

Scope. This bibliography covers every SC&A-authored report or review material identified in the reference list of SC&A's August 17, 2026 Pinellas response, together with the 2026 response itself. It is therefore a complete bibliography of the SC&A materials cited in that document—not necessarily every SC&A document ever created about Pinellas.

Synthesis

The SC&A record develops in five stages: a specialized 2021 methodology review concerning special tritium compounds; a compiled interview record covering 2004–2020; the 2023 interim review of NIOSH's SEC-00256 evaluation; the 2025 supplemental review; and the 2026 point-by-point response to issues raised by the petitioner and Work Group. Across the 2023–2026 reports, SC&A consistently supports NIOSH's position that dose reconstruction can be performed with sufficient accuracy. The most useful rebuttal approach is therefore not merely to dispute isolated findings, but to test whether each report demonstrates complete source-term characterization, representative worker monitoring, adequate record survival, and cumulative uncertainty control.

Annotated Entries

1. SC&A, Inc. 2021. “Focused Review of ORAUT-OTIB-0066, Revision 01, for Resolution of Issues.” Memorandum, April 28, 2021.

Document type: Focused methodology review; not a Pinellas-specific SEC evaluation.

Purpose: To determine whether revision 01 of ORAUT-OTIB-0066 adequately resolved issues previously identified by SC&A concerning calculation of dose from intakes of special tritium compounds.

Scope and evidence reviewed: The memorandum addresses dose-calculation methodology for organically bound tritium and metal tritides. The 2026 Pinellas response relies on this memorandum to support use of ORAUT's revised technical guidance for special tritium compounds.

Principal finding: SC&A concluded that revision 01 adequately addressed the concerns arising from its earlier review of revision 00.

Rebuttal significance: This memorandum is relevant only to the adequacy of a general calculation method. It does not, by itself, demonstrate that Pinellas-specific compounds, release conditions, worker groups, intake dates, solubility forms, or monitoring records were completely characterized. A rebuttal should distinguish methodological capability from the availability and representativeness of site-specific inputs.

Limitations and cautions: The uploaded 2026 response provides only a brief characterization of this memorandum. A definitive annotation of its detailed assumptions would require direct review of the 2021 memorandum.

2. SC&A, Inc. 2004–2020. “Pinellas Plant Interviews.” Site Research Database Reference ID 182929.

Document type: Compiled interview and meeting record.

Purpose: To preserve worker-meeting notes, interview materials, and related testimony concerning Pinellas operations, radiation exposures, monitoring, incidents, and work practices.

Scope and evidence reviewed: The collection includes ORAU-hosted worker meetings in 2004 and 2005, Department of Labor roundtables in 2006, and 12 interviews conducted by NIOSH and SC&A in January 2012. The

2012 participants included Building 400 workers with plutonium bioassays, health physicists, engineers, and trades personnel.

Principal finding: The 2026 report treats the interview record as evidence that former-worker input was gathered through several formats. It also notes that SC&A reviewed 490 computer-assisted telephone interview reports during its initial SEC review for evidence of monitoring, incidents, and follow-up actions.

Rebuttal significance: This collection is important because it shows that worker testimony formed part of the evidentiary record. The rebuttal should examine whether interview claims were systematically coded, corroborated against records, and followed through when they identified undocumented operations or unusual events. The existence of many interviews does not prove that every relevant worker group, building, shift, contractor population, or classified operation was represented.

Limitations and cautions: The collection is not described as a conventional analytical report, and the 2026 response acknowledges that some meetings did not include SC&A or Board representatives. It also corrects an attribution in the 2023 report, stating that certain SEC-specific interviews involved ORAU and NIOSH, not SC&A.

3. SC&A, Inc. 2023. “Interim SC&A Review of the SEC Petition Evaluation Report for Petition SEC-00256: Pinellas Plant.” SCA-TR-2023-SEC001, Revision 0.

Document type: Interim technical review of NIOSH's SEC petition evaluation report.

Purpose: To independently review NIOSH's 2021 evaluation of SEC-00256 and assess whether the available records and dose-reconstruction methods supported NIOSH's conclusion.

Scope and evidence reviewed: The report examined environmental monitoring, plutonium, other radionuclides, internal and external exposure issues, incident information, worker interviews, and the site's monitoring record. Appendix C summarized interviews conducted between 2007 and 2021.

Principal finding: As characterized in the 2026 response, the interim review supported NIOSH's conclusion that no plutonium release from plant operations was demonstrated, attributed off-site plutonium findings to fallout, and concluded that the potential for plutonium intakes had been adequately addressed. It also concurred with NIOSH on several other radionuclides, including carbon-14, cobalt-60, krypton-85, and nickel-63.

Rebuttal significance: The central rebuttal question is whether the interim report moved from 'no documented release' to 'no credible occupational pathway' without fully demonstrating monitoring completeness, worker representativeness, record survival, and local workplace coverage. Environmental non-detection and engineering containment do not alone establish that maintenance, abnormal operations, contamination events, or unmonitored worker groups can be reconstructed with sufficient accuracy.

Limitations and cautions: The report was expressly interim. The 2026 response also corrects one statement in its interview appendix. Its conclusions should therefore be assessed in light of later evidence, supplemental submissions, and unresolved questions identified after June 2023.

4. SC&A, Inc. 2025. “Supplemental SC&A Review of the SEC Petition Evaluation Report for Petition SEC-00256: Pinellas Plant.” SCA-TR-2025-SEC001, Revision 0.

Document type: Supplemental technical review.

Purpose: To update the 2023 interim review, evaluate additional material submitted by the Authorized Petitioner Representative, respond to Work Group concerns, and examine newly located documents.

Scope and evidence reviewed: The supplemental review addressed plutonium sampling and potential releases, RTG models and heat sources, the Heather project, and other issues raised after the interim review. It analyzed approximately 100 plutonium urinalysis, air-sampling, and environmental-sampling results.

Principal finding: SC&A reported no indication of elevated stack-scrubber samples, worker uptake, or potential uptake of plutonium or other transuranic radionuclides arising from plant operations. It identified three plutonium

heat-source models associated with three Pinellas RTG models and concluded that the Heather project involved a glass component in a tritium delivery system rather than uranium-doped glass.

Rebuttal significance: The rebuttal should test the denominator behind the approximately 100 samples: which years, buildings, tasks, worker categories, and abnormal events they represent. A limited sample set can be analytically sensitive yet not representative. The report's RTG and Heather conclusions should also be compared against material-accountability records, production records, maintenance records, and classified-record limitations.

Limitations and cautions: The supplemental review is selective and issue-driven rather than a full reconstruction of every historical operation. Its conclusion that no uptake was indicated depends upon the completeness, quality, and interpretation of the located sample set.

5. SC&A, Inc. 2026. "SC&A Response to Pinellas Plant Issues Raised at the January 29, 2026, Work Group Meeting." SCA-TR-2026-SEC001, Revision 0 (Draft), August 17, 2026.

Document type: Draft point-by-point response and follow-up technical review.

Purpose: To respond comprehensively to the petitioner's January 2026 weight-of-evidence paper and to additional issues raised by Work Group members at the January 29, 2026 meeting.

Scope and evidence reviewed: The report addresses plutonium, uranium and the Heather project, thorium, special tritium compounds, americium-241, californium-252, carbon-14, cobalt-60, cesium-137, krypton-85, nickel-63, RTG end use, contracts, permissive-action-link work, worker interviews, health-physics staffing, and plutonium leak testing.

Principal finding: SC&A states that the new material does not alter the technical foundation supporting dose reconstructability. It rejects the claim that 91.4938 kilograms of Mound plutonium were shipped exclusively to Pinellas, finds no credible evidence of uncontained plutonium, and concludes that no consequential unmonitored source term or new exposure pathway was established.

Rebuttal significance: This report is the principal rebuttal target. It should be analyzed for recurring substitutions: engineering expectation for historical validation; environmental surveillance for occupational monitoring; analytical sensitivity for representative coverage; and absence of reported events for completeness of the record. Even where SC&A successfully corrects a factual interpretation, the remaining SEC question is whether the surviving evidence is sufficiently complete to reconstruct doses for the proposed class.

Limitations and cautions: The report is expressly marked Draft and preliminary, and its closing date for examining new material was the end of May 2026. It is not a final NIOSH or Advisory Board position. Some issues remain acknowledged as uncertain, including whether additional leak checks occurred and how long sources remained onsite before assembly.

Cross-Report Rebuttal Matrix

SC&A item	Primary function	Core conclusion used by SC&A	Highest-value rebuttal test
2021 OTIB-0066 memorandum	Method review	Revised special-tritium method resolves earlier issues	Does a valid method have complete Pinellas-specific inputs?
2004–2020 interview collection	Worker-history evidence	Worker input was gathered in multiple formats	Were all worker groups represented and allegations independently followed up?
2023 interim review	Initial independent SEC review	NIOSH can reconstruct dose; plutonium pathway resolved	Does non-detection prove monitoring and record completeness?
2025 supplemental review	Review of new submissions and records	Additional evidence does not change reconstructability	Are roughly 100 samples representative across years, tasks, and worker groups?
2026 response	Point-by-point rebuttal	No new consequential source	Has SC&A affirmatively

		term or pathway identified	demonstrated sufficient accuracy, rather than only rebutted allegations?
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Bottom-Line Use in the SEC-00256 Rebuttal

- Separate methodological adequacy from site-specific evidentiary adequacy.
- Ask whether the monitored workers and samples represent the full proposed worker class.
- Distinguish environmental non-detection from localized occupational exposure conditions.
- Treat engineering containment as a hypothesis requiring historical validation, not as proof of actual performance.
- Evaluate missing, classified, destroyed, or unlocated records as a cumulative reconstructability problem.
- Return every dispute to the governing question: can doses be reconstructed with sufficient accuracy for the proposed class?

Prepared as an evidentiary research aid for review of SEC-00256.

Denise De Garmo, PhD (©2026) Reconstructing Occupational Radiation Exposure: Historical Evidence, Scientific Method and the Reliability of Retrospective Dose Reconstruction: The Pinellas Plant Case Study. Manuscript currently under editorial development