

SEC-00256 NIOSH Contradictions: Citation-Grade Source Trace

Exact document revision, date, page, and underlying primary-source trail

© Denise De Garmo Manuscript Under Evaluation

Methodological Note

The ten entries are not all the same kind of inconsistency. This trace distinguishes pure NIOSH-vs-NIOSH contradictions from NIOSH conclusions that are in tension with underlying General Electric primary records, and from NIOSH conclusions challenged by SC&A worker evidence. Short quoted phrases are used only where necessary; the surrounding propositions are paraphrased to preserve context.

Citation Trace Matrix

ID / Classification	Position A: exact source	Position B: exact source	Underlying primary source	Nature of inconsistency	Required reconciliation	Strength
C-01 — No Pu contamination vs removable contamination NIOSH vs underlying GE primary record	NIOSH 2016 memo: “no records indicating that Pu contamination was ever present at the site.” Pinellas Plutonium Bioassay Data: Response to follow-up of Issue 3; No revision number shown; January 13, 2016; PDF p. 1	NIOSH 2011 TBD reports incoming sources were surveyed; detectable contamination below 200 dpm triggered decontamination. ORAUT-TKBS-0029-5, Pinellas Plant – Occupational Internal Dose; Rev. 01; Effective April 1, 2011; PDF p. 11 (Sec. 5.2.2)	GE 1982a, Safety Analysis Report, Expansion of Building 400 RTG Facility, May 1982, SRDB 13264; Huffman, “Pu Contaminated Waste,” Jan. 30, 1979, SRDB 12832, pp. 3–4.	Critical. The categorical statement requires a definition that excludes removable exterior source contamination inside the receipt hood.	Define whether ‘no contamination’ excludes removable contamination on incoming sources inside the receipt hood.	Critical
C-02 — Access to Pu bioassay vs missing 1984 compilation NIOSH vs NIOSH	2021 ER: “NIOSH has access to the bioassay results.” SEC-00256 Petition Evaluation Report; Rev. 0; October 13, 2021; PDF p. 63, Sec. 7.1.1.2	2011 TBD: “no similar compilation ... found for 1984.” ORAUT-TKBS-0029-5; Rev. 01; April 1, 2011; PDF p. 25, Sec. 5.7.3	GE 1975–1986 collection of plutonium bioassay data, SRDB 12102; GE 1987–1990 collection of plutonium bioassay/environmental data, SRDB 12743; individual Personnel Exposure files in NOCTS may partially substitute.	Very High. NIOSH must show whether individual records reconstruct the complete 1984 required-monitoring population.	Produce a complete 1984 roster-to-bioassay reconstruction or explain why completeness is unnecessary.	Very High
C-03 — Bioassay used as confirmation vs acknowledged poor data quality NIOSH vs NIOSH	2021 ER relies on annual Pu bioassay as confirmatory evidence supporting no internal exposure. SEC-00256 ER; Rev. 0; October 13, 2021; PDF p. 63, Sec. 7.1.1.2	2016 NIOSH memo: “quality of bioassay data from Pinellas is questionable.” Pinellas Plutonium Bioassay Data response; No revision number shown; January 13, 2016; PDF p. 3	GE 1987–1990 Pu bioassay/environmental collection, SRDB 12743; Christy 1988 Environmental Plutonium Analysis; Weaver 1989a/b; lab QA comparisons with Mound.	Very High. Later reliance requires an explicit explanation of how the acknowledged analytical problems were resolved or rendered immaterial.	Identify what evidence resolved the acknowledged Pu analytical-quality problems.	Very High
C-04 — Which worker population validates no internal Pu exposure? NIOSH vs NIOSH + SC&A worker evidence	2011 TBD says east-Building-400 personnel were subject to preoperational and annual Pu sampling. ORAUT-TKBS-0029-5; Rev. 01; April 1, 2011; PDF p. 18, Sec. 5.3.3.3	2016 NIOSH approach limits potential Pu dose to receipt-inspection/decontamination workers; SC&A 2012 identified destructive-test workers as a high-potential subset. NIOSH 2016 Pu memo; SC&A Pinellas Work Group Update; NIOSH memo / SC&A update; Jan. 13, 2016 / Nov. 19, 2012; NIOSH PDF p. 3 / SC&A PDF p. 3	GE 1982a SAR, SRDB 13264; Holliday 1983 Internal Dosimetry Practices, SRDB 12177; destructive-testing worker interview/test records referenced by SC&A.	Critical. These are not demonstrably the same population. A worker-level roster-to-bioassay crosswalk is the needed reconciliation.	Identify the exact exposure population and provide the worker-level monitoring crosswalk.	Critical
C-05 — Triple containment vs exterior removable contamination NIOSH conclusion vs primary operational control record	2021 ER: heat-source containment made Pu nondispersible and there was “no plutonium contamination within the facility.” SEC-00256 ER; Rev. 0; October 13, 2021; PDF p. 63	2011 TBD reports source surveys and decontamination for detectable removable contamination below 200 dpm. ORAUT-TKBS-0029-5; Rev. 01; April 1, 2011; PDF p. 11	GE 1982a SAR; Huffman 1979 memo noting sources above the detection limit occurred at about 1 in 70 receipts.	Very High. Fuel encapsulation and exterior transferable contamination are different exposure-control questions.	Separate fuel-capsule integrity from exterior removable contamination and bound both.	Very High

C-06 — Fixed air-monitor nondetects vs task-specific representativeness NIOSH evidentiary tension (not a facial contradiction)	2011 TBD: nine continuous sampling points; 1988 report stated no Pu detected in air. ORAUT-TKBS-0029-5; Rev. 01; April 1, 2011; PDF pp. 15–16, Sec. 5.3.2.2	SC&A 2012 identified destructive testing as a high-exposure-potential subset; receipt/decontamination were localized source-handling tasks. SC&A Pinellas Work Group Update; NIOSH 2016 Pu memo; SC&A update / NIOSH memo; Nov. 19, 2012 / Jan. 13, 2016; SC&A PDF p. 3 / NIOSH PDF p. 3	Dixon 1988a/b continuous-air-monitor procedures, SRDB 12828; Christy 1988; Weaver 1989a; source-inspection task records.	High. Nondetects bound task exposure only if sampler location, uptime, sensitivity, and timing are representative.	Show sampler maps, uptime, sensitivity, and task correlation for the highest-potential operations.	High
C-07 — Annual monitoring evidence vs uncertain comprehensiveness NIOSH feasibility conclusion vs SC&A representativeness concern	2021 ER states RTG workers working with sources submitted annual samples. SEC-00256 ER; Rev. 0; October 13, 2021; PDF p. 63	SC&A 2012: “monitoring was not comprehensive” but targeted to persons believed to have exposure potential. SC&A Pinellas Plant Work Group Update; Update memorandum; November 19, 2012; PDF p. 3, Issue #4	GE 1982a SAR; Holliday 1983; GE Pu bioassay compilations SRDB 12102/12743; worker assignment and Personnel Monitoring records.	Very High. Existence of annual samples does not establish the denominator or validate selection criteria.	Provide annual eligible-worker and monitored-worker counts and selection criteria.	Very High
C-08 — 1975 calendar-year bioassay vs RTG startup timing NIOSH record-interpretation tension	2011 TBD describes Pu bioassay compilations beginning in 1975. ORAUT-TKBS-0029-5; Rev. 01; April 1, 2011; PDF p. 25	2016 NIOSH memo says the 1975 Pu bioassay it reviewed predated RTG work and no Pu source term was then present. NIOSH Pu Bioassay Response; No revision number shown; January 13, 2016; PDF p. 1	GE 1975–1986 Pu bioassay collection, SRDB 12102; GE 1982a SAR/site records establishing RTG source receipt period.	High. A calendar-year dataset does not demonstrate post-startup baseline/annual coverage; the post-receipt 1975 worker subset must be isolated.	Separate pre-RTG 1975 samples from post-source-receipt RTG worker monitoring.	High
C-09 — Potentially positive Pu results vs categorical no-intake conclusion NIOSH analytical tension	2021 ER concludes Pu was not available for worker inhalation or ingestion. SEC-00256 ER; Rev. 0; October 13, 2021; PDF p. 63	2016 NIOSH memo documents 12 potentially positive samples and says there was “very little data available to base conclusions.” NIOSH Pu Bioassay Response; No revision number shown; January 13, 2016; PDF pp. 2–3	GE 1987–1990 collection, SRDB 12743; Weaver 1989a/b; raw alpha spectra/count-time/tracer-yield and follow-up records.	Very High. The ultimate conclusion depends on whether every rejected positive can be independently verified from the underlying analytical record.	Provide raw analytical/follow-up evidence sufficient to verify each rejected potentially positive result.	Very High
C-10 — Historical Pu monitoring controls vs later no-methodology conclusion NIOSH/program-policy tension (not direct contradiction)	Historical primary records required baseline/annual Pu urine sampling for east-Building-400 RTG personnel. ORAUT-TKBS-0029-5 summarizing GE 1982a/Holliday 1983; Rev. 01; April 1, 2011; PDF p. 18	2021 ER concludes internal Pu reconstruction methodology is unnecessary because credible personnel internal dose was not supported. SEC-00256 ER; Rev. 0; October 13, 2021; PDF p. 63	GE 1982a SAR, SRDB 13264; Holliday 1983 Internal Dosimetry Practices, SRDB 12177; later NIOSH/Work Group meeting record.	High. Historical monitoring does not prove intake, but the later dismissal should explain why the exposure scenarios that triggered monitoring can be excluded rather than merely bounded.	Explain why historically monitored Pu pathways can now be excluded rather than conservatively reconstructed.	High

Primary-Source Index

Citation Key	Title	Date	SRDB / locator
GE 1982a	Safety Analysis Report, Expansion of Building 400 RTG Facility	May 1982	SRDB 13264
Holliday 1983	Internal Dosimetry Practices	September 23, 1983	SRDB 12177
Huffman 1979	“Pu Contaminated Waste,” memorandum to file	January 30, 1979	SRDB 12832, pp. 3–4
GE 1975–1986	Collection of plutonium bioassay data	1975–1986	SRDB 12102
GE 1987–1990	Collection of plutonium bioassay and environmental data	1987–1990	SRDB 12743
Christy 1988	Environmental Plutonium Analysis 1988	December 14, 1988	SRDB 12743, pp. 16–17
Dixon 1988a/b	Equipment Alpha Continuous Air Monitor procedures FAC-1001/FAC-1009	March 24/30, 1988	SRDB 12828
Weaver 1989a	1988 Plutonium Bioassay Results	January 27, 1989	SRDB 12743, pp. 6–7
Weaver 1989b	Review of Pu Bioassay Results, Attachment 3 to HP-04	May 26, 1989	SRDB 12743, p. 4

Bottom-Line Ranking

The most defensible lead exhibits are C-01 and C-04. C-01 attacks the categorical 'no contamination' wording with NIOSH's own summary of the GE receipt/decontamination controls. C-04 attacks the worker-population premise by showing that the broad historical sampling rule, NIOSH's later receipt/decontamination focus, and SC&A's destructive-testing concern are not

demonstrably the same worker population. C-02 and C-03 are the strongest supporting record-completeness and measurement-quality issues.

Public Source Links

- **NIOSH, ORAUT-TKBS-0029-5 Rev. 01:** <https://www.cdc.gov/niosh/ocas/pdfs/arch/pine5-r1.pdf>
- **NIOSH, Pinellas Pu Bioassay Response, Jan. 13, 2016:** <https://www.cdc.gov/niosh/ocas/pdfs/dps/dc-pinellaspubio-r0.pdf>
- **NIOSH, SEC-00256 Evaluation Report Rev. 0:** <https://www.cdc.gov/niosh/ocas/pdfs/sec/pinellas/pinellaser-256-r0-508.pdf>
- **SC&A, Pinellas Plant Work Group Update, Nov. 19, 2012:** <https://www.cdc.gov/niosh/ocas/pdfs/abrwh/scarpts/sca-pinewg-111912.pdf>
- **SC&A Supplemental Review presentation, Jan. 29, 2026:** <https://www.cdc.gov/niosh/ocas/pdfs/abrwh/pres/2026/sca-pinellassecc256er-012926-508.pdf>