SC&A Status Update on Comments Matrix, Review of Petitioner Submissions, and Other Matters

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History of SEC-00256 reviews & discussions

- 10/13/2021: NIOSH SEC-00256 Petition Evaluation Report (ER)
- 12/8/2021: ABRWH meeting. NIOSH presented ER; SC&A tasked to review
- 12/8/2022: ABRWH meeting. SC&A presented the status of ER review
- 6/16/2023: SC&A Interim Review Report
- 11/20/2023: WG meeting
  - NIOSH presentation of ER
  - SC&A presentation of Interim Review Report
  - NIOSH presentation on its response to SC&A's Interim Review Report
- 12/7/2023: ABRWH meeting. SC&A presentation of Interim Review Report

SC&A tasking

- The WG recognizes that the ER review process is ongoing, and assessments are subject to revision
- 12/8/2021 ABRWH meeting: Review ER
- 11/20/2023 WG meeting set several tasks:
  - Develop a Comments Matrix to facilitate tracking status
  - Assess new reports, claimant interviews, and petitioner submittals
  - Evaluate all new information from data collection activities after the June 2023 SC&A Interim Review Report closing (circa March 2023)
  - Identify any areas of concern for dose reconstruction
  - Supplement the SC&A Interim Review Report with follow-up report

Comments matrix

- Matrix includes, from the SC&A Interim Review Report:
  - Observations
  - General petitioner issues
  - Petitioner comments (including some after the report but before the 11/20/23 WG meeting)
- Matrix status: SC&A is finalizing its internal review and plans to send a draft for comment/revision to the WG and NIOSH.

New reports, claimant interviews, submittals

- There have been no new reports or claimant interviews since issuance of the SC&A Interim Review Report; SC&A will participate in any interview activities initiated by NIOSH.
- SC&A is identifying, collecting, summarizing, and commenting on all transmittals made by claimants or their representatives from 2022–present with the goals of:
  - Gathering all submittals in one convenient table
  - Ensuring that all relevant petitioner concerns are adequately addressed
  - Serving as a resource for any areas requiring further investigation
- Status: Ongoing

Petitioner documents submitted

Year	Submittals to DFO	Documents Submitted
2022	2	7
2023	11	42
2024 (to July 1st)	7	7
Total	**20**	**56**

Petitioner documents review table format

DFO Submittal Date to WG	Document Date[(a)]	File ID: (number), name[(b)]	Contents	Comments
date	date	(number), name	text	text

Notes

(a) A single transmittal to the DFO may contain multiple documents

(b) SC&A has assigned document numbers for convenience in referring to the documents; e.g. (23-7) indicates the 7th document of 2023. “Name” is the actual name of the transmitted file.

Topics of special interest

- As a result of petitioner, WG, and SC&A interests, SC&A has been investigating several subjects in more detail, including:
  - Plutonium handling operations, the possibility of the presence of unencapsulated plutonium, and the adequacy of bioassay information
  - Uranium bioassay sufficiency
  - Assess annual tritium inventories and device production records to see if there is a correlation to dosimetry records
  - Radioactive contamination not accounted for in the ER
  - Neutron generator details and exposure data
  - Radioisotope thermoelectric generators details and exposure data
  - Early plant operations and monitoring practices
  - Heather project
  - Research and development operations not accounted for in the ER

Data collection activities assessment

- SC&A is examining “new” documents from data captures placed in the Site Research Data Base (SRDB) (fall 2023) to inform reviews of subjects important to evaluation of the ER
- This activity has only recently begun following improved access to and search capabilities of the SRDB
- Status: Ongoing

Supplemental review report

- At some point in the SEC-0256 ER review cycle, SC&A will issue a supplement to its June 2023 Interim Review Report incorporating new material and findings
- Status: Not begun

Path forward summary

- Update Comments Matrix as receive responses to the items
- Continue all investigations (e.g., data completeness, sources of exposure not covered in the ER)
- Evaluate new information from data collection activities and petitioner submittals
- Identify and pursue areas warranting further investigation
- As they become available, access NOCTS, BRS, and CATI reports to determine any additional SEC-related issues
- Issue a supplemental report on findings

Questions?