

PHYSICIANS FOR SOCIAL RESPONSIBILITY

WESTERN NORTH CAROLINA CHAPTER

10 Chestnut Creek Road • Candler, NC 28715

STEERING COMMITTEE

Terry Clark, M.D.
Steve Gilman
Lew Patrice, M.D.
Phil Bisesi
Brita Clark
Stan Dienst, M.D.
Robert Howarth
Mary Olson
Don Richardson, M.D.

January 3, 2014

Peter S. Winokur, Ph.D.
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, Suite 700
Washington, D.C. 20004

RECEIVED
2013 JAN -6 PM 4:28
DNF SAFETY BOARD

Dear Chairman Winokur and Members of the Board,
The following comments are in addition to my oral comments presented in Knoxville, Tennessee on December 10, 2013.

I address the following topics:

1. Nuclear Operations and Oversight
2. Emergency Preparedness and Response
3. Aging Infrastructure
4. Uranium Processing Facility

I am concerned about the apparent laxity of nuclear operations, oversight and emergency preparedness that was reflected in the responses of witnesses from the National Nuclear Security Administration and Babcock and Wilcox at the December 10th Knoxville hearing. Their responses at times were vague and tentative. They prefaced some responses with phrases such as: "We've started to..., kind of..., all came out pretty good..., most of the time..., I'd like to see more of..., we need to upgrade..., we usually prefer..., we will try to get that better..." Several of their responses were vague

and did not answer the questions posed by the board members. They appeared to have a poorly defined plan for management of a severe event that would require regional or national resources.

Exposure to ionizing radiation increases the risk of malignancies. I am concerned that this information is not given appropriate emphasis regarding safe management and security of the Y-12 site in day-to-day operations as well as severe events.

I am concerned about the economic pressures of the progressively escalating cost for UPF construction from a few billion to nearly 20 billion dollars. I urge the board to be vigilant that escalating costs do not compromise safety and security. For example if a below ground facility would be more secure than it should be built below ground.

I understand that the mission decisions regarding nuclear weapons are made by others and that it is the board's and NNSA and industry contractor's duty to carry out the mission. I am concerned however of the impact of a mission based on poor logic upon those that are called to implement and monitor the plan. I am concerned that this dynamic may contribute to the laxity of management and contractors.

I am concerned that economic and political pressures may negatively impact security and safety. For example, in my estimation the local support for continued use of the ageing Y-12 complex and the construction of the UPF is largely driven by the desire for jobs. Local populace and officials are prone to minimize health and environmental impacts compared to job opportunities. I urge the board to continue to diligently maintain focus of the impact upon worker and public health.

In conclusion I am concerned regarding apparent laxity in safety, security and management of Y-12. I urge the board to evaluate

whether this laxity is driven by individual or systems issues. I am concerned about potential adverse impact of economic and political influences upon safety and security of the Y-12 complex and the planned UPF. I urge the board to consider these factors as you administer your role as the guardian of worker and public health.

Thank you.

Sincerely,



Terrence P. Clark, M.D

Chairperson,
Western North Carolina Chapter,
Physicians for Social Responsibility

Associate Clinical Professor
Psychiatry,
James H. Quillen College of Medicine,
East Tennessee State University