

Friday, July 7, 2017

James Biggins, General Counsel
Executive Secretary for the Hearing
Defense Nuclear Facilities Safety Board

By email to: hearing@dnfsb.gov

Re: Public Comments about the Safety Posture of the Plutonium Facility at **Los Alamos National Laboratory**

Dear Mr. Biggins:

Schooling of the public regarding nuclear physics is inadequate. News stories about the need for STEM education render elaboration of this fact unnecessary. Thus, your safety board is called upon to protect U.S. citizens from the danger of nuclear accidents and you have been given the power to do this. But recent incidents, accidents and events at Los Alamos National Laboratory (LANL) continue to threaten not only the public, but also the workers at the Plutonium Facility.

An elementary safety step would seem to be the ability to have a readily accessible ventilation system in any confined areas of the lab. **Please install a working and certified safety-related active confinement ventilation system.**

Sincerely,

Board Member, Nuclear Energy Information Service.
Jan Boudart




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Re: Public Comments about the Safety Posture of the Plutonium Facility at **Los Alamos National Laboratory**

Dear Mr. Biggins:

It is my understanding that some important recommendations of the Defense Nuclear Facilities Safety Board have not been implemented. If the Board has the power, it should demand that operations be halted until ALL outstanding corrective actions are completed to the satisfaction of said Board. Especially when issues have been raised for years.

Please do everything in your power to see to **installing working and certified fire suppression systems in all areas of the lab.** Such systems are common, even in department stores. It is unthinkable that the laboratory with its added dangers does not have such.

Sincerely, Jan Boudart

Board Member, Nuclear Energy Information Service.
Jan Boudart

[REDACTED]

[REDACTED]

[REDACTED]

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Dear Mr. Biggins:

It is my understanding that not all plutonium stocks at Los Alamos have been secured in a certified way. My opinion and that of others: Plutonium is the most toxic and dangerous material humans have ever unleashed upon planet earth. It's very difficult to understand why, with the vast amounts of the national treasure that have been expended on the nuclear project, that plutonium is not first in line for attention to security.

Please complete the project to store plutonium in certified containers. In addition, with the accident at WIPP on February 14th, 2014 in mind, it is important to **install those certified containers in vaults**, so that in and untoward event, the problematic container will be isolated from workers and environments as much as possible. I recognize that plutonium cannot be made safe, but Los Alamos Labs should be at the forefront of protecting workers and the environment from its menace.

Sincerely, Jan Boudart

Board Member, Nuclear Energy Information Service.
Jan Boudart

[REDACTED]

[REDACTED]

[REDACTED]

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Dear Mr. Biggins:

Because of danger from criticality accidents, or “radiation bursts”, not only at Los Alamos, but at other, international plutonium facilities **training and protection for workers should be increased to include all recent knowledge and semi-annual (at least) drills on what to do to respond to an accident.**

The NRC should not discount the risk of a criticality accident, but make sure that all workers, not only are taught the risk, but also are regularly drilled on procedure, just as a CPR emergency responder must do every 6 months — even if the responder will see only one emergency in their lifetime (or none).

People working in nuclear facilities like LANL should, at least once a month, go through the routine of donning hazmat suits and respirator filters — a very annoying process with many little aggravations that need to be anticipated and routinized.

The technician that placed 8 radioactive rods in proximity to each other for a picture in August 2011 needed drill training: consistent reminder of the danger of what he was dealing with and the importance of staying way back from the possibility of criticality.

Sincerely, Jan Boudart

Board Member, Nuclear Energy Information Service.
Jan Boudart




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Re: Public Comments about the Safety Posture of the Plutonium Facility at **Los Alamos National Laboratory**

Dear Mr. Biggins:¹

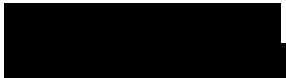
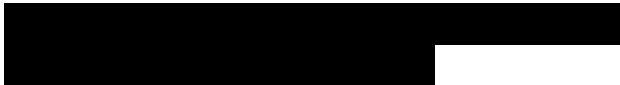
This letter concerns the worrying shortage of competent safety “watchdogs” in federal facilities that manufacture, process, and experiment with nuclear materials like plutonium and other transuranic elements and radioactive isotopes.

A lot of this work is done by outside contractors, whose employees are not, technically, federal employees. But since the DOE has made these contracts, it bears a responsibility to keep people who are working for contractors safe. I am reminded of the Japanese laborers at TEPCO who were in the second or third contracting tier and who were not protected at all.

Thus, I am hopeful you will **fill vacant positions within the Department of Energy (DOE) for contractor oversight.**

An other place where a lack of competent employees is in the field of criticality specialists. So I am also hopeful you will **fill vacant positions of criticality specialists at LANL and at all DOE sites handling plutonium and other special nuclear materials.**

Sincerely, Jan Boudart

Board Member, Nuclear Energy Information Service.




¹ My personal experience in a life-threatening situation occurred at Yosemite where there were not enough federal employees focused on safety.

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Dear Mr. Biggins:

Please add the Center for Public Integrity's "Nuclear Negligence" five-part series to the permanent record of the July 7 hearing., <https://apps.publicintegrity.org/nuclear-negligence/>

Sincerely, Jan Boudart

Board Member, Nuclear Energy Information Service.
Jan Boudart
