

Bruce Hamilton, Chairman
Jessie H. Roberson
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**DEFENSE NUCLEAR FACILITIES
SAFETY BOARD**

Washington, DC 20004-2901



October 10, 2019

The Honorable James Richard Perry
Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Perry:

We received the Department's letter dated September 10, 2019 rejecting Board Recommendation 2019-2, *Safety of Savannah River Site Tritium Facilities*.

In accordance with § 2286d(e) of the Atomic Energy Act, following the rejection of a recommendation, the Board "shall either reaffirm its original recommendation or make a revised recommendation and shall notify the Secretary of its action." As part of our review of the September 10, 2019 rejection of Recommendation 2019-2, we accept the Department's offer to brief us regarding DOE/NNSA's actions.

Pursuant to the Government in the Sunshine Act, we will conduct a public meeting at our Washington, DC headquarters to receive this briefing on October 28, 2019. We are interested in the Department's basis for rejecting Recommendation 2019-2 and actions to ensure adequate protection of the health and safety of the public and the workers.

We request the briefing address the specific topics outlined in the enclosure to this letter. Pursuant to 42 U.S.C. § 2286b(d), we request you confirm, by October 16, 2019, that you or your representative(s) will provide the briefing.

We will post the agenda for the public meeting on our web page, <http://www.dnfsb.gov>, and we will update the agenda as we finalize preparations for the meeting. Your staff may contact our Technical Director, Mr. Christopher Roscetti, should you have any questions or to make the necessary arrangements for your attendance or that of your representative(s).

Yours truly,

A handwritten signature in black ink that reads "Bruce Hamilton".

Bruce Hamilton
Chairman

Enclosure

c: Mr. Joe Olencz

Enclosure

The Board requests the following topics be addressed during the briefing:

- The decision to reject Recommendation 2019-2 as it relates to DOE Order 140.1, *Interface with the Defense Nuclear Facilities Safety Board*. DOE Order 140.1 included a new definition of public health and safety that was limited to “health and safety of individuals located beyond the site boundaries of DOE sites with DOE Defense Nuclear Facilities.” In addition, the Board is interested in understanding the Department’s basis for accepting Recommendation 2019-1, *Uncontrolled Hazard Scenarios and 10 CFR 830 Implementation at the Pantex Plant*, and rejecting Recommendation 2019-2.
- The high consequences to workers for an energetic accident at the Tritium Facilities, including DOE/NNSA’s basis for accepting this risk. To the Board’s knowledge, the cited documents in DOE/NNSA’s response do not reduce the dose consequences for co-located workers to acceptably low levels.
- Compensatory measures to reduce the risk of an energetic accident at the Tritium Facilities to acceptably low levels. DOE/NNSA has not identified compensatory measures that adequately reduce worker consequences for all accident scenarios.
- DOE/NNSA commitments to approve, fund, and execute strategies to address the risk associated with energetic accident scenarios at the Tritium Facilities, including modifications to existing controls and identification of new controls. The proposed long-term improvements, including the Tritium Finishing Facility, are contingent on funding and may not fully prevent high-dose worker consequences.
- The readiness of the site to respond to an energetic accident at the Tritium Facilities involving a significant number of workers with potential uptakes of tritiated water vapor. This should include any plans or actions taken to improve or demonstrate readiness for such a scenario. The 2018 annual site exercise cited in DOE/NNSA’s response did not demonstrate this capability.