Good Afternoon!  October 2, 2012

I am Mary Dennis Lentsch from Washburn TN. I live and volunteer at the Narrow Ridge Earth Literacy Center and also am active with OREPA.

I’m grateful to the Defense Nuclear Facilities Safety Board for holding this public hearing because I am very concerned about safety issues at the Y-12 nuclear weapons plant.

I’ve lived in East TN for over 20 years and people in this area often speak of being sold a “pig in a poke.” In this situation they feel they are not receiving fair goods or information they are entitled to have.

I believe the whole idea of building a uranium processing facility (UPF) is an overpriced and oversized “pig in a poke.” However, I’m here today to focus on safety issues related to the proposed UPF that also may be considered a “pig in a poke.”

--1. Preliminary Safety Design Report  NNSA has skipped the preparation of a Preliminary Safety Design Report. When we talk about a nuclear weapons facility safety must be the highest priority.

--2. Safety and Security  When it comes to nuclear weapons materials, security is a safety issue. Is NNSA compromising security and safety by proposing to build the UPF above ground?

--3. Relaxing Criticality Safety Standards  It seems NNSA has abandoned the fundamental obligation to safety in relaxing the criticality safety standards for the UPF to the point that it is no longer protective of worker or public safety.

--4. Seismic Issues  Seismic integrity is a safety issue and the public has a right to a clear and coherent explanation of seismic issues related to the design and construction of the UPF.

--5. Unproven Technologies  Unproven technologies are being incorporated into the UPF design in violation of industry best practices. If these technologies don’t work there will be a need for extensive and expensive redesign.

--6. Competence and Safety-Design Negligence  Considering the safety issues I’ve raised, my serious question is whether NNSA has the integrity and competence to manage all the complexity related to the safety design of the UPF.

Thanks, again, to the NDFSB for being a vigilant watchdog for safety issues at Y-12 and in the design process for the UPF.  THANK YOU.