

Dear Defense Nuclear Facilities Safety Board,

I want to express my appreciation for the work the DNFSB conducts as the only independent agency with access to the United States National Laboratories.

Thank you for conducting this hearing. I hope there will be more frequent hearings as LANL attempts to expand its plutonium missions.

As a United States citizen, and taxpaying member of the public, I am writing to express my concerns about the safety of ongoing and planned expansion of nuclear weapons activities at Los Alamos National Laboratory.

These activities include multiple shift industrial scale plutonium pit production, surplus plutonium disposition, and receipt and packaging of large amounts of heat source plutonium all to take place at PF-4 (Plutonium facility)

From time to time, the newspapers publish articles about safety breaches of a number of kinds, often well after the fact that are of concern. Sometimes letters to the Editor are published in local media on safety issues at the laboratory as well.

The New Mexico Radioactive and Hazardous Materials Committee meets at least annually for briefings on LANL activities. The most recent meeting was on Monday Nov. 14. The Committee heard testimony on the many of the same concerns that have been voiced by the Safety Board and others over the past months from informed experts such as the Los Alamos Study Group.

In June 2022 the US Government Accountability Office (GAO) issued the second of two reports citing improvements in safety and other areas and outlining challenges that still remain since the new contractor, Triad LLC, took over operations back in 2018. The challenges that remain do not inspire confidence nearly four years into a ten year contract. The GAO report states, "NNSA cited numerous operational incidents such as injuries and a flood in a nuclear facility which indicate that lessons learned from errors under the prior contractor have not been fully integrated into laboratory operations."

The report summary goes on to cite challenges Triad LLC is facing in attracting new staff and small businesses due to Los Alamos' remote location and the "unique nature" of LANL's work. The report summary also mentions LANL's need to expand its workforce due to NNSA's planned expansion of plutonium pit production and other operations at LANL.

On the workforce problem, I recently read (but can't substantiate the source at this time) that the potential local New Mexico workforce for LANL's needs for expanding operations is tapped out. Additionally, in reading a number of employee reviews both pro and con written by current and former LANL employees from many different departments, I noticed numerous references to remote location, various housing and commuting difficulties and upper management problems.

I feel it is very important to closely examine how these types of factors play in to safety at LANL at many levels.

As you know, you, the Safety Board, wrote a letter to Secretary Granholm on Aug. 11 2022 which outlined its concerns about heat source plutonium operations, which also cited plans for triple missions operations at PF-4.

This report is alarming and substantiates much of what is reported in the media and much more.

An example I find particularly worrisome is to learn from your letter that NNSA has, as far as a layperson can tell, “downgraded plans for upgrading a ventilation system that seems a crucial component of fire prevention techniques, as stated here” “NNSA has recently changed its strategy to upgrade the active confinement ventilation system to achieve a “robust” system rather than a safety class, seismically qualified system, *contrary to the Board's advice.* “(Emphasis added)
The best possible ventilation system seems like it should be a no-brainer for NNSA in the interest of the workers, the public and its national security missions.

Finally, I just discovered an Oct 20th DNFSB letter to Secretary Granholm informing her of several overdue reports and stating that DOE has not consistently provided reports by the Board’s requested due date or even given written notice requesting additional time for reporting by the due dates thereby affecting the Board’s safety oversight.

Included in the list of overdue reporting are:

-Report on analysis performed by LANL on Board Technical Report 44, Plutonium Facility Leak Pathway Factor Methodology, which was due on Sept. 12.

-“written response on implementation of the unreviewed safety question process following a probabilistic seismic hazard analysis update, originally due Aug. 1, 2022 and extended by DOE letter by 45 days dated Aug. 20, 2022. (from Board letter dated June 16, 2022.”)

The letter concludes very reasonably, “The Board requires the requested information to determine whether further Board action is needed to fulfill its safety oversight mission.”

These kinds of delays that compromise the Safety Board’s assigned mission should not happen frequently, or at all, given the dangerous nature of all plutonium operations including clean-up of legacy waste and new waste resulting from expanding plutonium operations.

Factors such as these are extremely relevant to the safety of LANL workers, the public, the environment, and the national security mission; especially in light of the fact that LANL, in spite of the billions of taxpayer dollars poured into it has never maintained any kind of consistent production of plutonium pits over the decades since it was tasked with pit missions.

Again, I am very appreciative of the crucial work the Safety Board performs on behalf of the public and of LANL.

I hope DOE, NNSA, and LANL will clean up their act prior to embarking on the unbelievably dangerous mission of simultaneous missions of industrial-scale plutonium pit product, surplus Plutonium disposition, and receiving and repackaging heat source plutonium, all in the elderly and inadequate PF-4 building.

Sincerely,
Suzanne Schwartz
Nortenos for Peaceful and Sustainable Futures
El Prado

<https://www.gao.gov/products/gao-22-105412>

<https://ehss.energy.gov/deprep/2022/FB22G11B.PDF>

<https://www.dnfsb.gov/sites/default/files/document/26836/Outstanding%20DOE%20reporting%20requirements%20%5B2023-100-002%5D.pdf>

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