Vic and Gail Macks

20318 Edmunton

St. Clair Shores, MI 48080-3748

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Debra Richardson, Deputy General Manager

Defense Nuclear Facilities Safety Board

625 Indiana Avenue, NW, Suite 700

Washington, DC 20004-2901

Regarding the design and management for the construction of the Uranium Production Facility at the Y-12 Oakridge, TN complex:

Thank you for your work overseeing the plans and design of the UPF. The public depends on you to be the safety experts and to provide badly needed accountability. We have no confidence in NNSA's capacity to put safety first—the rush to build the UPF seems to be pushing everything else, including safety, to the margins.

Thank you for the chance to address these issues; we think safety is a critical issue, and NNSA has provided little information and no opportunity for a public conversation about their plans.

Your concerns about the relaxation of criticality safety standards are very important. We wonder if the decision to relax standards doesn't raise a larger question about NNSA's management competence. We believe any nuclear facility built in Oak Ridge must embrace a "maximum safety" standard rather than cut corners. With the skyrocketing cost estimates for the UPF, it seems they have money for everything but safety—and in the end, safety is the one thing we should be doubling down on.

The NNSA decision to skip the Preliminary Safety Design Report is profoundly important, and we are grateful that you have called them to account for it. We wonder, too, how much extra money is being spent on retroactively trying to prepare and implement the Preliminary Safety Design Report.

The General Accounting Office has done a good job documenting the timeline problems with pushing design and construction so fast that unproven technologies are being incorporated into the design in violation of industry best practices. Obviously this raises safety concerns as well. We hope DNFSB will use its powers of persuasion to call for thing to slow down (rather than accelerate) until common sense is also incorporated into the planning process for the UPF.

We know DNFSB decided to delay a portion of your hearing here about NNSA operations at Y12. We hope you will reschedule soon. A broader discussion of Y12 preparedness is not only needed—all we are hearing to date is press releases and self-serving statements in Congress, unspecific assurances that everything is being taken care of, which sounds too much like what we heard before. We believe the questions about the UPF—technlogy, readiness, safety, cost—coupled with general questions about operations and security, call into serious question the NNSA's capacity to manage complexity.

We appreciate DNFSB's efforts to compel NNSA to address seismic issues related to the design and construction of the UPF. NSSA has declined to provide a clear and coherent explanation of these issues to the public —they barely mentioned them in the Environmental Impact Statement. The public has a right to know what steps are being taken to address the concerns you have raised about seismic integrity and to understand fully what the current UPF plan does and does not do to assure seismic integrity of the UPF.

Security, when it comes to special nuclear materials, IS a safety issue. When the HEUMF was being built, a number of organizations and agencies, including the DOE Inspector General were critical of the decision to place the facility above grade. NNSA said it would save money, but the Inspector General eventually pointed out even that was questionable. We wonder if DNFSB believes NNSA is making the same mistake with the UPF—compromising security and safety by building it above ground.

Sincerely

Vic Macks

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